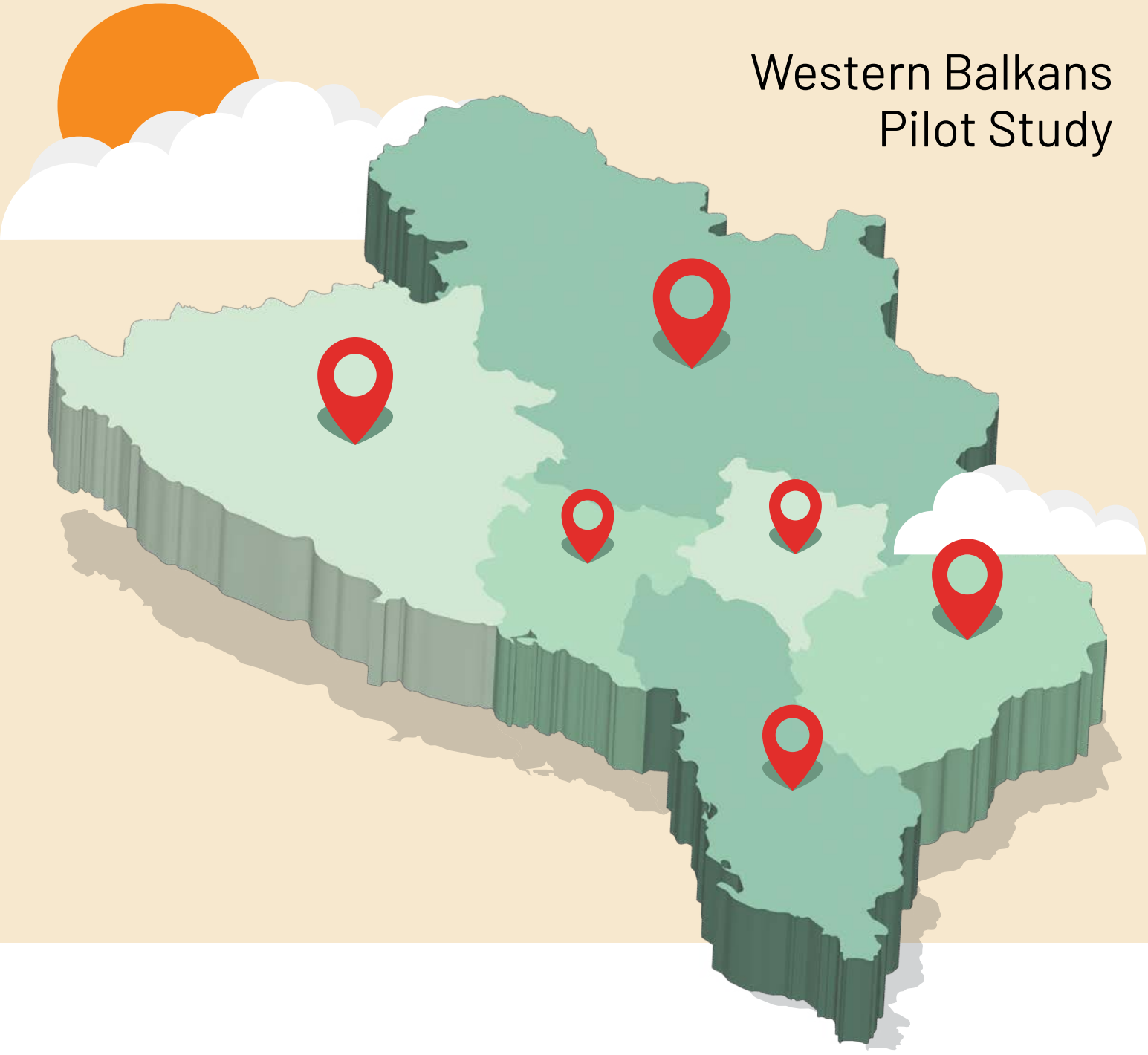
MEDIA DIVERSITY
RESEARCH CENTRE

THE MEDIA DIVERSITY INDEX 2026

Western Balkans Pilot Study



MEDIADIVERSITY INSTITUTE

THE MEDIA DIVERSITY INDEX 2026

WESTERN BALKANS PILOT STUDY

MDI and MDI WB wish to acknowledge several individuals whose input has been crucial to the overall Media Diversity Index pilot project and to the Western Balkans data-gathering discussed in this report. The scoring system for the index was devised by Craig Robertson and advice on the pilot questionnaire design was received from Nico Drok, Epp Lauk and Greg Treadwell. The introduction and overview sections of this report were written by Naomi Sakr.

CONTENTS

4 INTRODUCTION

5 OVERVIEW

7 SUMMARY OF FINDINGS BY COUNTRY

8 ALBANIA

15 BOSNIA AND HERZEGOVINA

20 KOSOVO

27 MONTENEGRO

38 NORTH MACEDONIA

47 SERBIA

56 RECOMMENDATIONS

58 ABOUT THE CONTRIBUTORS

60 REFERENCES

INTRODUCTION

The Media Diversity Index is a pilot project of the MDI Media Diversity Research Centre. With the findings on the six Western Balkan countries considered in this report, the pilot has entered its fourth phase, following earlier iterations covering eleven countries in mainland Europe in 2024, the UK in 2025 and five South American countries in May 2026.

Combined, the four phases of the project are a step towards developing a global index that stakeholders inside and outside the media industry can use as a benchmark for evaluating the performance of media in specific countries regarding diversity and inclusion. The index covers both governance and content and is created through an expert survey, whereby responses gathered translate into scores. Hitherto, 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. The Media Diversity Index is eventually intended as an annual exercise that 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.

In line with that objective, the index also has the potential to inform government and civil society efforts to promote media diversity. While the comparative scores tend to attract most attention, the survey responses behind them help to identify policy areas where targeted advocacy could achieve results. They can bring groups together from different sectors, including industry practitioners, diversity advocates and academic researchers, to mobilise the skills and structures needed for monitoring and campaigning.

The indicators 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.

A pilot project such as this is necessarily limited in scope because the main purpose is to test the methodology. Previous phases demonstrated how scores and rankings based on media diversity indicators can differ from those produced by indexes focusing specifically on democracy or press freedom. Media diversity findings for 11 European countries in 2024 ranked countries like Austria and Estonia less favourably than when indicators relating primarily to political systems or press freedom were in play.[1] The UK report highlighted the extent to which, even when positive policies and procedures are in place to promote inclusive media, performance on diversity comes down to editorial and workplace attitudes.[2] In South America, open government systems underpinning civil society monitoring activity and action against discrimination in Colombia and Peru helped to improve these countries' scores vis-à-vis those they achieved on indexes measuring other aspects of public accountability.[3]

1. https://www.media-diversity.org/wp-content/uploads/2024/12/Media-Diversity-Index-study.pdf
2. https://www.media-diversity.org/uk-media-diversity-index/
3. https://www.media-diversity.org/wp-content/uploads/2026/05/MDI_Index_SouthAmerica-2.pdf

OVERVIEW

The six countries covered here have different levels of political accountability. The Varieties of Democracy (V-Dem) index, which takes a multidimensional approach to measuring the quality and nature of democracy in 179 countries, categorises Kosovo and Montenegro as electoral democracies, meaning that multiparty elections for the executive are free and fair, degrees of suffrage, freedom of expression and association are satisfactory, the executive is under judicial and legislative constraints and civil liberties are protected.[4] In contrast, the V-Dem index for 2025, released in March 2026, classed Serbia as an electoral autocracy[5], meaning that, even though multiparty elections are held regularly, harassment of opposition figures, a lack of democratic safeguards and media controls favouring those in power stop the elections being free or fair.

Despite the entrenched nature of Serbia's regime, a grassroots movement led by students managed to dislodge the government of Aleksandar Vučić in Serbia's parliamentary elections on 25 October 2026, overturning the effects of 14 years of anti-democratic rule to secure 140 out of the 250 seats in the National Assembly. The coming period is consequently expected to see a fundamental shift in media operations that previously strongly favoured Vučić and his power base. For the remaining three countries, Albania, Bosnia and Herzegovina and North Macedonia, the V-Dem index has the category "grey zone". This concept is applied in cases where political regimes are "close to the threshold between democracy and autocracy" but the precise dividing line cannot be stated with certainty because of concerns about the potential for measurement errors.[6]

In the Media Diversity Index, unlike the V-Dem findings, the focus is specifically on the accountability of media systems in relation to the inclusion of all social groups. The results therefore also differ from those of the latest Reporters sans frontières Press Freedom Index, which are presented here alongside the V-Dem scores. Comparing the three indexes is useful because it highlights answers prompted by the Media Diversity survey about issues such as unpunished hate speech, accessibility of media content for people with visual or hearing impairments, gender equality in newsrooms and news coverage, diversity of media practitioners, broadband speeds in outlying areas, and much more.

Montenegro, for example, which ranks highest among the six countries according to the V-Dem and RSF scores, comes third in the Media Diversity Index partly through effects of its widely recognised problem with hate speech. North Macedonia's higher score on this index acknowledges elements such as the special status granted in principle to community media and provisions for exposing discrimination in media workplaces, including for women journalists. The quantitative side of the survey gives credit for regulatory measures in place while the report on each country also highlights cases where those measures are ignored, not used or overridden. Serbia, for example, is not bottom of this six-country list despite its unfavourable political situation under the Vučić government, because legal provision exists in principle to promote diversity but has not been applied in practice. To take just two instances: the regulatory body with responsibility for licensing media providers does have powers to act against discriminatory content but has not used them, and favourable provisions exist for non-profit media even though, in practice, such media have found it hard to survive.

4. V-Dem Institute (2026) *Democracy Report 2026: Unraveling the Democratic Era?* https://www.v-dem.net/documents/75/V-Dem_Institute_Democracy_Report_2026_lowres.pdf p. 7
5. *Democracy Report 2026*, p. 24
6. *Democracy Report 2026*, p. 11.

Kosovo comes second in the six-country ranking for both the V-Dem and Media Diversity indexes but loses points in the latter for such matters as the lack of a robust and transparent system for handling complaints about discrimination. Albania is the only country in this phase of the Media Diversity Index project to have been scored twice, having achieved 33.25 out of 80 in the 2024 round. Its improved result this time partly stems from recent measures that attempted to deal with offending content on global social media platforms, monitoring workforce composition and actions taken by the country's Commissioner for Protection from Discrimination. The score for Bosnia and Herzegovina reflects gaps in areas such as internet provision and promoting diversity in media workplace recruitment. The six countries' scores and rank are shown in Table 1.

Table 1: The MDI Pilot Diversity Index – Western Balkans

MDI score (out of 80*)	For comparison:	V-Dem rank (out of 179)	V-Dem score (out of 100)	RSF rank (out of 180)	RSF score (out of 100)
North Macedonia **51.25**		Montenegro **64**	Montenegro **63.6**	Montenegro **41**	Montenegro **71.80**
Kosovo **50.00**		Kosovo **68**	Kosovo **63.1**	N. Macedonia **45**	N. Macedonia **69.49**
Montenegro **43.50**		N. Macedonia **78**	N. Macedonia **56.2**	Albania **83**	Albania **56.52**
Serbia **41.25**		BiH **88**	BiH **49.8**	Kosovo **84**	Kosovo **55.89**
Albania **40.00**		Albania **91**	Albania **48.4**	BiH **90**	BiH **54.29**
Bosnia & Herzegovina **39.25**		Serbia **119**	Serbia **30.0**	Serbia **104**	Serbia **50.79**

**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).*

Table 2: The MDI Pilot Diversity Index - 22 countries (Europe and South America)

MDI scores out of 80*			
United Kingdom **65.25**	Greece **47.75**	Slovakia **43.00**	Cyprus **35.25**
Belgium **62.50**	Uruguay **46.25**	Colombia **42.75**	Chile **34.75**
Lithuania **59.75**	Austria **45.25**	Serbia **41.25**	Malta **28.75**
Portugal **59.25**	Latvia **44.75**	Albania **40.00**	Argentina **24.00**
North Macedonia **51.25**	Estonia **44.25**	Bosnia & Herzegovina **39.25**	
Kosovo **50.00**	Montenegro **43.50**	Peru **38.75**	

SUMMARY OF FINDINGS BY COUNTRY

Measuring aspects of media diversity can be objective to a degree, where the assessment is based on laws, mandates, published guidelines and reports. The survey included some Yes/No answers for the most clear-cut examples of relevant action. Other parts offered options on a five-point ordinal scale, weighted in a way that limits the impact of any answer that had to rely at least in part on subjective judgement in the absence of solid data.

The indicators are assessed under headings that group four types of action: law, licensing and regulation; media workforce diversity and recruitment policies; ensuring access and representation; consultation and handling complaints. A number of actors are identified as having the potential to influence each area of action. Six are considered in the survey: licensing authorities; self-regulatory bodies; public service or state media; commercial media; unions or associations (of journalists or actors); and national human rights institutions (NHRIs).

How much independence these bodies enjoy is clearly a factor in any campaign to promote more inclusive media practice. In 2026 the annual State Media Monitor classified the public broadcasters of Montenegro and Bosnia as "state controlled" and those of Albania and Serbia as "captured public/state-managed". "Captured" in this typology refers to public service or state-owned media not predominantly financed through state budget resources but where the state is using its status as owner and/or its control over the management of these outlets to influence their editorial agenda. North Macedonian broadcaster MRT, which was previously considered state-controlled, was reclassified as "independent state funded and state managed" in 2026. Kosovo is not included in this and some other classifications because it is not a member of the United Nations, its membership having been blocked by Russia and China.

Independence is also critical for national human rights institutions, which have to adhere fully to the UN Paris Principles to qualify for A status. The NHRIs of Albania, Bosnia and Herzegovina and Serbia have this status whereas those of Montenegro and North Macedonia are rated B, as partially compliant with the Paris Principles. All five are members of the Global Alliance of National Human Rights Institutions (GANHRI). Kosovo's NHRI holds observer status at GANHRI and is a non-accredited associate member of the European Network of National Human Rights Institutions. It operates independently and functions in strong alignment with the UN Paris Principles.

The one existing index that has directly informed some of the scoring across all phases of the Media Diversity Index so far deals with gender equality in media coverage and workforces. This is the Global Media Monitoring Project (GMMP), "Who Makes the News?", which has calculated the average gender gap in the news in a snapshot every five years since 1995 and completed its seventh round of global monitoring in 2025. However, of the six Western Balkans countries examined here, reports from the 2025 round exist only for Bosnia and Herzegovina and Serbia. For Bosnia and Herzegovina the report showed that women's representation in the news remains highly uneven and topic-dependent in ways that reinforce stereotypical associations between women and victimisation or entertainment. Findings from the Serbia monitoring indicated a gradual increase in women's visibility over time, from 20 per cent in 2020 to 28 per cent of all individuals heard, seen, or read about in newspapers, television, radio, and digital news in 2025. Yet only 12 per cent of all expert sources cited in the news were women. For other countries, data on gender (and much else) are collated by the Media Pluralism Monitor, developed and managed by the Centre for Media Pluralism and Media Freedom at the European University Institute, which converts findings about media pluralism in European countries into risk indicators.



ALBANIA

Dorentina Hysa and Ilda Londo

Regulatory powers: Law No. 97/2013, "On Audiovisual Media in the Republic of Albania", as amended by Law No. 30/2023, prohibits audiovisual media service providers and video-sharing platforms from broadcasting content that incites violence or hatred against a group or a member of a group (Art. 32(4)(a)). The list of grounds is broad: sex, race, colour, ethnic or social origin, language, religion or belief, political opinion, nationality, membership of a national minority, disability, age, sexual orientation and any other ground in the anti-discrimination law. The 2023 amendments also added a principle of gender equality and non-discrimination that prohibits sexism in the media (Art. 4(1)(f)) and a definition of gender-based discrimination in audio-visual media (Art. 3(36/1)). Art. 19(3) requires the Audiovisual Media Authority (AMA) to supervise compliance and impose sanctions, and the AMA Broadcasting Code (Decision No. 60/2023, amended by Decision No. 107/2024), states that broadcasts must not incite hatred, intolerance or discrimination.

In 2024 the AMA reviewed 241 broadcasts on its own initiative and found breaches in 77, of which 16 involved hate speech or discrimination. The four most serious cases were fined ALL 50,000–200,000 and the other ten received formal warnings. In every case the broadcasters were also required to remove the content from YouTube and social media, and they complied. The same year, through its voluntary reporting channel with TikTok, the AMA secured the removal of 286 harmful videos, including 107 for incitement to violence and hatred.

Overall, action is real but modest. Of 194 complaints handled by the AMA Complaints Council in the first half of 2026, six were related to hate speech or discrimination and only two of these were subject of warnings. Most outcomes are warnings and fines, while some hate-speech complaints are rejected as protected opinion. The AMA also has no effective power over online portals or the social media platforms like Facebook, Instagram and YouTube, because these have no legal representation in Albania.

Regulation of online content: Regulatory powers over online content are narrow. Law No. 30/2023 transposed the EU's 2018 Audiovisual Media Services (AVMS) Directive and brought video-sharing platform (VSP) services under the AMA (Arts. 2, 30/1 and 32/1(4)). VSP providers must take measures to protect the general public from content inciting violence or hatred, and the AMA is to set the detailed requirements by regulation (Art. 32(4/1)).

In practice, jurisdiction extends only to VSPs established in Albania (or with a parent company or branch in-country), which excludes the global platforms Albanians actually use (YouTube, TikTok, Meta). AMA complaint bulletins show it routinely declines complaints about online portals, Facebook, TikTok and petition sites as outside its competence. The EU Digital Services Act has not been transposed, and the government's 2019 "anti-defamation package", which would have extended AMA's oversight to online media, was not adopted following Venice Commission and civil-society criticism.

However, since 2024, AMA has a voluntary cooperation with Tik-Tok, which grants a flagging role to notify the platform of offending content that is in Albanian or disseminated in Albania and, if it is not removed, refer it to the regulator with jurisdiction (Art. 9(2)-(3)). Its homepage[7] now carries a "Send a complaint about TikTok / X" button leading to separate online reporting forms for TikTok (since August 2024) and X (since 2025). This was announced as a cooperation to report harmful videos (early removals were mostly piracy-related), which drew concerns about "digital censorship" (Reporter.al, Sept 2024)[8]. Albania has not aligned with the Digital Services Act (Media Pluralism Monitor 2026); the AMA said in October 2025 it was working on DSA alignment, with proposals expected in Parliament.

7. https://ama.gov.al/
8. https://www.reporter.al/2024/09/03/perfshirja-e-ama-s-ne-moderimin-e-tiktok-ngre-shqetesime-per-censure-digjitale/

In addition, platform measures have been taken outside the AMA framework. The government blocked TikTok by Council of Ministers Decision No. 151 (March 2025); the ban was repealed by Decision No. 62 of 3 February 2026, and on 11 March 2026 the Constitutional Court found it violated freedom of expression and the ban was lifted after a year.

Children's programming: Art. 32/1(4)(a) of Law 97/2013 (as amended 2023) obliges VSP providers to take the necessary measures to protect children from programmes, user-generated videos and commercial communications that may harm their physical, mental or moral development, and Art. 32/1(1) refers to age-verification tools and other technical measures. The jurisdictional limitation affecting global platforms applies, meaning that the obligations bind only VSPs established in Albania and do not regulate the platforms most used by children. Child online protection is otherwise handled through criminal law and the State Agency for Child Rights and Protection rather than the media regulator.

Commercial licences carry no quota for original, locally made children's content. Law 97/2013 contains European-works and independent-production quotas (Arts. 35–36) and extensive child-protection rules (scheduling and warnings, advertising limits in children's programmes, a ban on product placement in them; Arts. 32/1, 43, 44, 46), but no children's programming quota. Children's programming is supposed to account for 16.98 per cent of total broadcast time as part of the public-service remit of Albanian Radio-Television (*Radio Televizioni Shqiptar* – RTSH), which runs a dedicated children's channel (RTSH Kids, launched in 2017), but actual performance on this is unclear.

Self-regulation: There is no self-regulatory mechanism for print news. Print is governed only by the very short Law No. 8239/1997 "On the Press", which essentially guarantees press freedom and sets up no regulatory body. Liability for content runs through the general courts, for example in defamation cases under the Civil and Criminal Codes.

The only self-regulation body for digital news is the Alliance for Ethical Media (*Aleanca për Media Etike*),[9] set up in 2020 with the Albanian Media Council (*Këshilli Shqiptar i Medias*)[10] as secretariat. Members sign a memorandum committing them to comply with the Code of Ethics for Journalists (revised) and to accept decisions of the Alliance's Board of Ethics; they display the Alliance logo linking to a complaints form. Membership is therefore conditional on following the Code, whose Article 8 bans material inciting hatred or violence on grounds including race, religion, ethnic origin, gender, sexual orientation, disability and age. This rule is generally applied. In November 2024 the Board upheld a complaint by Aleanca LGBTI and the organisation OMSA against MCN TV's programme *Xhadat*, finding breaches of Articles 1, 8, 9 and 17. Under the Board's rules, an outlet that does not publish a decision against it is named to the other members and to the public. The Board also hears complaints against non-members. Even so the Alliance's reach is limited. Its roughly 40 members are mostly online outlets, and the largest national broadcasters are not among them. It is not formally registered and depends on project-based donor funding, which does not ensure sustainability.

The Union of Albanian Journalists (*Unioni i Gazetarëve Shqiptarë* – UGSH)[11] is the most prominent membership organisation. The national Code of Ethics for Journalists (last revision in 2025[12]) is the common reference text for journalists' organisations and for the Alliance for Ethical Media. As noted, Article 8 bans material inciting hatred or violence based on race, religion, nationality, colour, ethnic origin, gender, sexual orientation, civil status, disability, illness or age, and asks media not to mention a person's origin, ethnicity, religion or sexual orientation unless relevant. Discrimination on grounds of language is mentioned only in the Code's introductory statement, not in Article 8, which also does not cover geographical origin.

9. https://aleancaetike.media/
10. https://kshm.al/
11. https://www.facebook.com/UnionilGazetareveShqiptare/
12. https://institutemedia.org/wp-content/uploads/2025/10/Kodi-i-Etikes-se-Gazetarit-Shqip.pdf

A newer body, the Association of Journalists of Albania (*Asocacioni i Gazetarëve të Shqipërisë* – AGSH)[13], founded in May 2024, focuses on defending journalists' rights and safety and has committed to adopting a professional code of conduct for its members, but has not yet published its own code.

National human rights institution: Albania has two relevant bodies. The People's Advocate (*Avokati i Popullit*) is the A-status NHRI and issues recommendations only. The Commissioner for Protection from Discrimination (*Komisioneri për Mbrojtjen nga Diskriminimi* - KMD), the independent equality body under Law No. 10221/2010 as amended by Law No. 124/2020,[14] acts mainly upon complaints, issues binding decisions and fines, and may file lawsuits in defence of equality on matters of collective interest. The 2020 amendments expressly define hate speech as a form of discrimination and allow NGOs to complain on behalf of victims.

The KMD has applied its powers to broadcast speech, e.g. Decision No. 199 (Oct 2023) on a complaint concerning Top Channel, and Decision No. 23 (Jan 2024) finding hate speech against Jehovah's Witnesses on television. Its decisions can be challenged in court: in January 2024 the Tirana Administrative Court annulled a KMD decision on hate speech against LGBTI+ people. The KMD has a cooperation agreement with the AMA.

There has been no reported KMD or People's Advocate investigation of antisemitism in the media, which studies describe as marginal. Albania adopted the IHRA working definition of antisemitism in 2020 and the Council of Europe Advisory body on Human Rights and Minorities (ACFC) recommends vigilance. No media-specific investigation has been reported into Islamophobia. The KMD has publicly condemned online religious hate speech against Albanians in North Macedonia and Kosovo, but those cases were referred to police rather than investigated as media cases. A KMD investigation was announced in May 2024 into Islamophobic remarks made on the TV programme *Opinion* but its outcome was not reported.

KMD Decision No. 23 (19 Jan 2024) found hate speech against the Jehovah's Witnesses community by a guest on Euronews Albania. The KMD also reports cases about language used about Roma in the media, part of a minority-related caseload dominated by Roma and Egyptian complainants (ACFC 5th Opinion[15]).

Access: Law No. 54/2024 "On Electronic Communications" replaced Law 9918/2008 in order to transpose the European Electronic Communications Code, which requires affordable "adequate broadband internet access" within the universal service, to be defined nationally. The old law guaranteed only "functional internet access", and the telecoms regulator, the Authority on Electronic and Postal Communications (*Autoriteti i Komunikimeve Elektronike dhe Postare* – AKEP) had not revisited broadband within the universal service since 2017. Minimum speeds or affordability thresholds do not yet appear to have been set under the 2024 law. The 2020 National Plan for Sustainable Development of Digital Infrastructure set EU-aligned targets, but as policy rather than a legal guarantee.

Law No. 54/2024 requires AKEP to guarantee affordable, adequate broadband for all consumers throughout Albania, independently of their geographic location, with one article that also requires intervention where market provision or other public-policy measures cannot meet reasonable requests for access. According to AKEP's 2025 annual report,[16] the basic universal-access objectives are largely fulfilled. It cites improvements in mobile coverage of mountainous tourist areas, while acknowledging that effective implementation and real, affordable, quality access remain challenges that need to be overcome. According to this report, the two mobile service companies cover 99-100 per cent of the population, and 96-97

13. https://agsh.al/rreth-nesh/
14. https://qbz.gov.al/akt/14718
15. https://rm.coe.int/5th-op-albania-en/1680acf90e
16. https://akep.al/wp-content/uploads/2026/07/Raporti-Vjetor-2025-AKEP-final.pdf

per cent of the territory through the 4G network, whereas the coverage of 5G network is still lagging behind. Similarly, broadband fixed networks offer access to 95 per cent of households, and 97.7 per cent of households have internet access, making this service almost universal, according to AKEP. However, some isolated places in mountainous terrain may not enjoy a good connection – a rural connectivity gap also identified in an ITU report.[17]

Law No. 97/2013, as amended in 2023, requires audio-visual media service providers to make their programmes progressively accessible to persons with disabilities, draw up accessibility action plans and report yearly to the AMA (Art. 32/2). The AMA must set rules on sign language, teletext, subtitling and audio description (Art. 47), and national licences require sign language in news (Art. 67(2)(dh)). The law also obliges the AMA to run an accessible contact point for accessibility complaints (Art. 32/2(4)). In practice, however, follow-up is weak. The obligations are qualified ("gradually and progressively", "to a reasonable extent") and the law sets no minimum quotas. Sign-language interpretation of news began only in December 2023, and the AMA's 2024 report names just four channels that comply: Klan, Top Channel, Vizion Plus and the public service network RTSH. A 2026 study[18] reported only three licensed interpreters and four stations (RTSH, TV Klan, Top Channel, Vizion Plus) offering interpreted news on certain days, with almost nothing beyond news. No sanctions for non-compliance have been found, and in February 2026 organisations of people with hearing impairments reported that they remain largely excluded from public information.

Community media and minority languages: Albania has not yet signed the European Charter for Regional or Minority Languages. Law 97/2013 (updated) recognises "community broadcasting" as a distinct non-profit category (Arts. 3(49), 57–58) with its own licensing procedure, exemption from licence fees (Art. 25(2)), and an explicit purpose of reflecting the community's cultural, linguistic and religious needs. The category covers radio only (there is no community TV category) and is not specific to minority languages. In practice it is used by religious communities. The four community radio licences registered with the AMA are each held by one of the main religious communities: Radio Spektrum (Muslim Community), Radio Maria ("Radio Maria" Association), Radio Ngjallja (Orthodox Church) and Radio Dodona (Bektashi World Headquarters). The ACFC 5th Opinion (2023) reports that no national minority community had requested a community radio licence.[19] Minority-language output receives no state support. It relies on the public service broadcaster, which provides daily five-minute radio bulletins produced by volunteers and a weekly Romani TV programme, RTSH Gjirokastër. There are also print/online minority language outlets, including in Macedonian.

There is no formal requirement that any media, even the public service media, should make efforts to translate content in the languages of minorities. However, under Law 96/2017 on protecting minorities, minorities have the right to have their own media and express opinions in all media, without discrimination, and the public broadcaster complies through a commitment in its contract with the regulator[20] whereby it devotes its second general channel to news bulletins in minority languages. The contract also establishes a quota of 0.51 per cent of total broadcasting time on all RTSH channels for foreign languages, which includes not only minority languages but all foreign language broadcasting in Albanian public radio and television. The regulator's Broadcasting Code states that media enable programmes for children in the language of minorities that live in Albania[21], but this is not translated into specific licence conditions or any prescribed quota and there is no evidence of active pursuit of these kinds of programmes.

17. https://www.itu.int/en/ITU-D/Regional-Presence/Europe/Documents/Publications/2025/Clean_Closing Rural Connectivity Gap Policy Paper _June 2025.pdf
18. https://citizens.al/2026/02/26/heshtja-e-detyruar-personat-me-aftesi-te-kufizuar-ne-degjim-mbeten-jashte-informacionit-publik/
19. https://rm.coe.int/5th-op-albania-en/1680acf90e
20. https://ama.gov.al/wp-content/uploads/Kontrate-e-sherbimit-te-transmetimit-publik.pdf
21. https://ama.gov.al/wp-content/uploads/2020/07/Kodi-i-Transmetimit-AMA-.pdf

Workforce recruitment: The regulator licensing media providers is not responsible for monitoring media workforce criteria. Labour relations are regulated by the Code of Labour and, apart from general requirements against discrimination, there is no specific legislation or regulation relating to diversity. Even so, in its annual bulletin of data about media outlets, the regulator publishes some information on the gender, age, salaries, and job positions of employees working in radio television and cable stations. Meanwhile the RTSH Statute includes diversity as one of the values that guide public broadcaster operations, which are in general expected to strive to cover all groups in society, but these general principles do not translate in any specific or concrete measures regarding employment policy. The public broadcaster runs services in the languages of minorities, albeit for a limited amount of daily or weekly airtime, which requires employment of staff from the relevant ethnic and linguistic minorities.

Since the regulator's data on broadcasting staff is limited to age, gender and seniority, and major commercial media companies do not share any information about recruitment policies relating to diversity, it is not possible to assess the diversity of commercial media staff.

Representation: As the public broadcaster, RTSH has a mandate to cover diversity, both by law and in its Statute, but the mandate is general. Law 97/2013 requires it to serve all groups in society, including national minorities, and reflect the diversity of Albanian life through programming. This principle is also upheld in the public mission contract principles the RTSH signs with the regulator, stating that, among other things, it vows to uphold the principle of not discriminating on grounds of gender, race, religion, nationality, language, political conviction, social status, etc. In addition, RTSH is required to broadcast in the languages of minorities – this requirement stemming not so much from its own mandate in the Statute as from the law on protection of minorities. The public service contract specifies that RTSH 2 must reflect Albania's cultural, linguistic, ethnic and social diversity through content that enables each group to see itself represented and feel part of national cohesion. It explicitly includes people regardless of race, ethnicity, religious belief, political opinion, sexual orientation or disability.

Despite this mandate the only data regularly collected to monitor inclusiveness in media content are contained in the annual bulletin on economic and demographic indicators of audiovisual media outlets, which covers only television, radio and cable TV stations, not online media or print media. According to the Audiovisual Media Authority the percentages of female journalists in television and radio in 2024 were 55 per cent and 56 per cent respectively.[22] There are no data for online media or print media. The same source puts the total proportion of female staff in television at 41 per cent at end-2025 but this figure was for the totality of staff, not only journalists. AMA data for a sample week in 2025 also show that the proportion of women invited onto television talk shows ranged between 32 per cent and 42 per cent across 12 television stations while the number of female moderators was consistently equal to or higher than male moderators, ranging from 39 per cent to 82 per cent[23].

Other monitoring reports indicate severe underrepresentation of women during election periods. According to the *Media Pluralism Monitor* results for 2026, women made up 38.7 per cent of candidates during the 2025 parliamentary elections but received only 9.9 per cent of airtime in news editions.[24] BIRN's *Media Ownership Monitor* for Albania has data from 2023 on women in decision-making roles, showing they accounted for 40.2 per cent among top managers, including CEOs/editors-in-chief, but just under 30 per cent for the leading news media and only 21.31 per cent in key editorial positions below editor-in-chief.[25]

22. https://ama.gov.al/wp-content/uploads/AMA-BULETINI-PERIODIK-11-2.pdf
23. https://ama.gov.al/wp-content/uploads/AMA-BULETINI-PERIODIK-12-1-1.pdf
24. https://cmpf.eui.eu/country/albania-2026/
25. https://albania.mom-gmr.org/en/findings/findings/#!717e16ed45b3ca7086aea0aed927d1bf

The fact that RTSH has four regional radio and TV branches implies greater presence in and representation of different regions of the country. However, data are lacking to reflect this and the *Media Pluralism Monitor 2026* states that, despite the local branches, the public service broadcaster's "coverage of local issues in its flagship national broadcast channel remains limited".[26]

There is no monitoring of, and very little attention paid to, the public broadcaster's entertainment content. The broadcaster's own annual reports rank the main shows and channels /audience they address, but there is no further information on groups targeted and covered. The fact that it has a specific children's channel is noted by the regulator but most of its content is not original production and says nothing about the representation of children in wider media. Coverage of faith groups is sporadic, being limited to live coverage during religious ceremonies and there is no monitoring of representation of people with disabilities or low-income groups. Human rights defenders complain about sexism, gender bias, promotion of stereotypes, and victimisation and objectification of women in overall television content while LGBT groups complain about media neglect and misrepresentation.

Consultation mechanisms: Law 97/2013 requires the AMA to hold public consultations for at least 30 days before regulatory decisions (Art. 48) and to consult stakeholders on its strategy (Art. 21). Under Article 9 of the law, candidates to the AMA Board may be nominated by human-rights, child-rights and disability organisations. The Complaints Council's hearings involve complainants, including CSOs that work primarily with women and girls. Other groups are not systematically represented.

Under Law No. 54/2024[27] "On Electronic Communications", AKEP's five-member Board has no diversity requirement. Parliament appoints the members on the government's proposal, and they must be experts with at least ten years' experience in the electronic communications, postal, economic or legal sectors. The law sets no gender balance or representation of social groups (Art. 14). It does, nonetheless, require consultation with some groups. AKEP must hold a public consultation for at least 30 days on any significant measure (Art. 44) and must take into account the views of consumers and users with disabilities on end-user rights and equal access (Art. 45(1)). Together with the body responsible for protecting persons with disabilities, it must set up a consultation mechanism accessible to users with disabilities (Art. 45(2)).

AMA and the Complaints Council conduct outreach activities such as media literacy campaigns with children, including pre-schoolers, but these are not consultative.

Exposing discrimination at work: Although the journalists' union, UGSH, does not openly invite members to share experiences of discrimination at work, in practice journalists do turn to the union with individual complaints and the union usually responds with public statements in their defence. It also holds regional meetings with journalists. There is no equivalent forum for performers to share experiences of discrimination at work. Actors at state theatres are public employees under the Labour Code, and freelance performers have no collective body. Discrimination therefore surfaces only through cases of individual performers reported in the press, such as contracted actors at the National Theatre reporting unequal pay and work without social or health insurance. Performers can complain individually to the Commissioner for Protection from Discrimination or the State Labour Inspectorate, but neither is specific to the sector.

Handling complaints: The AMA Council of Complaints has a legally defined procedure (Arts. 20, 51–53): written complaints within 30 days of broadcast, a short deadline for the broadcaster's reply, optional hearings with the parties, written notification of conclusions, and a public

26. https://cmpf.eui.eu/country/albania-2026/
27. https://akep.al/wp-content/uploads/2024/10/ligj-2024-05-30-54.pdf

bulletin every six months detailing each complaint and outcome. In the first half of 2026 the Complaints Council handled 194 complaints; six of the cases were related to hate speech or discrimination and only two of them were subject of warnings. The procedure is transparent by regional standards but is limited to broadcasting, with online outlets excluded, and sanctions are mostly warnings.

The public service broadcaster RTSH must have a complaints procedure under Art. 51 of Law 97/2013 but in practice this is neither robust nor transparent. It has a Complaints Review Board but publishes no data on complaints or outcomes. When the AMA forwarded a complaint about RTSH content in late 2023, it did not respond within the legal deadline (AMA Complaints Bulletin, Dec 2023).

The Alliance for Ethical Media's Board of Ethics accepts complaints through an online form linked from members' websites and publishes reasoned decisions. Use of this mechanism has grown. According to Albanian Media Council data, complaints more than doubled from 31 in 2021 to 67 in 2023, apparently reflecting increased public awareness of the principles of self-regulation.[28] Hate speech is a ground for complaint under Art. 8 of the Code of Ethics. The Board also examines complaints against non-member outlets (Art. 15 of its rules), although these have made no commitment to comply. Members are expected to comply, even though the decisions of the Board are not legally binding to them. Formally, the Alliance's Board (with the Albanian Media Council as secretariat) covers both print and online content, but in practice its members and cases are almost entirely online. The complaints mechanism still has its limitations as it covers print and online content only, its decisions are recommendations whose only sanction is publicity, and it depends on donor funding.

The Commissioner for Protection from Discrimination (KMD) accepts complaints about discriminatory media content free of charge, including from NGOs, and investigates ex officio. It has handled cases concerning language used on television and sexist coverage, although it reported to BIRN in 2025 that few complaints were filed and most came from civil society. Discriminatory commercial communications are banned by Law 97/2013 (Art. 42(3)) and can be raised with the AMA. The People's Advocate (the NHRI proper) monitors the media ex officio but does not specifically invite media complaints.

28. https://futureofmedia.seenpm.org/wp-content/uploads/2025/03/Ourmedia-Albania-EN.pdf



BOSNIA AND HERZEGOVINA

Lejla Turčilo

Regulatory powers: The Communication Regulatory Agency of Bosnia and Herzegovina (*Regulatorna agencija za komunikacije* – RAK) is the regulatory body for both broadcast and telecommunication and is legally required, under Article 4 of the Code on Audiovisual Media Services[29], to act against radio or TV stations that incite violence or hate. It has done so. Immediately after the war in Bosnia and Herzegovina, two radio stations had their licences withdrawn and were closed for spreading hate speech. In a recent case[30] RAK initiated proceedings in August 2026 against the public broadcaster of the entity of Republika Srpska, Radio-Televizija Republike Srpske (RTRS), in response to a complaint lodged by five associations of genocide survivors, including the Mothers of Srebrenica about insults and insinuations contained in a July 31 segment of the RTRS news programme Dnevnik 2. Allegations were made in the programme that survivors were profiteering from the genocide through a "money-making scheme". The five associations were the Association of Victims and Witnesses of Genocide; the Movement of Mothers of the Srebrenica and Žepa Enclaves; Women of Podrinje Association; Srebrenica Mothers Citizens' Association and Women of Srebrenica Association.

Regulation of online content: RAK has no legal powers to require social media companies or online platforms to protect users against incitement to violence or hatred. Its mandate covers broadcasting and telecommunications, but online platforms remain outside its jurisdiction. It has no powers to require social media companies or online platforms to protect children from harmful content through measures such as age verification, content moderation, search moderation, or complaint handling.

Children's programming: While there are rules regarding the protection of minors and obligations for public service broadcasters, quotas for children's programming are not part of the licensing requirements nor in the Law on Communication.[31]

Self-regulation: Membership in the Press and Online Media Council is completely voluntary and there is no conditionality in terms of membership. Membership is open to print and online media outlets which agree to uphold the Council's Code. Although the Code is explicitly against discriminatory reporting, there is no conditionality regarding this criterion.[32]

The Code of Conduct adopted by the largest national journalists' association in Bosnia and Herzegovina, Udruženje BH Novinari,[33] explicitly bans material that could incite hatred or discrimination The Code is aligned with international standards as established by the International Federation of Journalists and Council of Europe principles on freedom of expression and non-discrimination. It requires journalists to defend human rights, dignity, and freedom in their work, respect ethnic, cultural, and religious diversity and diverse opinions and contribute to strengthening democracy and provide truthful, balanced, and verified information, avoiding manipulation or falsification. The Code explicitly prohibits publishing material that could lead to hatred or discrimination based on ethnicity, religion, gender, or political affiliation.

National human rights institution: The Human Rights Ombudsman/Ombudsmen of BiH[34] is an A-rated national human rights institution that has the authority to investigate violations of anti-discrimination laws, including those occurring in the media, and to refer cases to courts or other competent bodies. Citizens may file a complaint if they believe they have been discriminated

29. https://docs.rak.ba/articles/2d1f484f-28cd-4ab4-8aa4-ff47831d2c04.pdf
30. https://bosnjaci.net/prilog.php?pid=86574
31. https://legalist.ba/wp-content/uploads/2014/02/Zakon-o-komunikacijama-BiH-nesluzbeni-precisceni-tekst.pdf
32. https://vzs.ba/en/press-and-online-media-code-of-bih/
33. https://bhnovinari.ba/bs/kodeks-asti-bh-novinara/?utm_source=copilot.com
34. https://www.ombudsmen.gov.ba/Default.aspx?id=0&lang=EN

against in the media (eg through reporting, advertisements, or stereotypes). The Ombudsman may issue recommendations to media outlets, advertisers, or regulatory bodies and, in serious cases, may initiate court proceedings or refer the case to competent institutions. The legal framework for such actions lies in the laws on Prohibition of Discrimination of BiH and the Law on the Human Rights Ombudsman of BiH.

The Ombudsman dealt with 11 cases of discrimination in the media in 2024, seven cases in 2025 and five cases between January and September 2026. All cases resulted in recommendations being issued; none of the cases went to court. They included alleged cases of antisemitism, Islamophobia, religious discrimination and stereotyping of minority ethnic groups. Reports in 2026 about antisemitic statements in political discourse being disseminated by the media were still under investigation at the time of going to press. The same applies to sporadic reports of instances of Islamophobia on social media and news portals in 2026. Cases of alleged religious discrimination concern offensive portrayals of certain religious communities and linking them to crime or extremism.

Access: RAK is the regulator for telecommunications as well as media. Universal service is limited to basic telecoms such as fixed-line telephone and the availability of public telephone services. Broadband internet is not legally defined as part of a mandatory universal service[35] and there is no legally defined universal service guarantee for broadband internet that would ensure a "decent and affordable" broadband connection for all citizens. Thus there is no guaranteed access to comprehensive range of national digital media across the entire country, including remote and mountainous regions.

However, RAK and the Ministry of Communications and Transport of BiH have strategies that emphasise the need to develop broadband infrastructure. Projects to build networks in rural and mountainous areas rely on EU funds, for example under the Instrument for Pre-accession Assistance (IPA) and the Digital Future sector of the Western Balkans Investment Framework (WBIF). In urban areas (Sarajevo, Mostar, Banja Luka, Tuzla), digital media are widely available via the internet, IPTV, and cable networks. Following the analogue TV signal switch-off, digital signal coverage is uneven across different parts of BiH; there are "white zones" where reception is unstable. This is an infrastructure issue, not the fault of media outlets.

Since 2023 RAK has mandated that media service providers must ensure the accessibility of programming content for persons with disabilities, including the visually impaired and the deaf. This means that licences and permits for broadcasters now include requirements to adapt content for these categories of users.[36] The regulator actively monitors and reports on provision through quotas, action plans, and annual reports. The initial follow-up shows progress, yet a gap remains between obligations and practice—particularly regarding audio description and sign language. The first reports submitted in 2024 showed that public service broadcasters (BHRT, FTV, RTRS) had the highest share of subtitled content, while audio description remained minimal.[37] Sign language remained underrepresented in 2025.

Community media and minority languages: RAK does not formally recognise non-profit community media in minority languages as a distinct category with simplified licensing requirements. It issues licenses to radio and TV broadcasters based on uniform rules, without a specific category for community media. While its regulations emphasise pluralism and content diversity, this applies to all licensed media rather than to a specific category.

Audiovisual media, including public broadcasters (BHRT, FTV, RTRS), are not legally required to translate content from the majority language into the languages of national minorities.

35. https://legalist.ba/wp-content/uploads/2014/02/Zakon-o-komunikacijama-BiH-nesluzbeni-precisceni-tekst.pdf
36. https://docs.rak.ba/articles/2bfd737c-6170-4092-86cb-179bd60abe9d.pdf?utm_source=copilot.com
37. https://docs.rak.ba/documents/508fe794-f1bc-4a72-90f7-80bcd69e2690.pdf

The Law on the Public RTV System of BiH (2005)[38] and subsequent regulations emphasise the obligation of pluralism and non-discrimination but do not mandate translations into minority languages. The country's Constitution[39] and laws on the rights of national minorities guarantee the right to information in one's mother tongue. However, in practice, this is realised through local and minority media outlets rather than through a requirement for public broadcasters to translate content.

Workforce recruitment: RAK does not systematically monitor the diversity of the workforce of licensed media providers and there are no publicly available reports or strategies indicating that it promotes diversity within its own workforce in terms of ensuring gender balance or including minority groups such as people with disabilities. Diversity monitoring carried out by independent research projects (eg the Global Media Monitoring Project, Mediacentar Sarajevo, BH Novinari) highlights persistent gender imbalance and underrepresentation of minority groups.

Public broadcasters (BHRT, FTV, RTRS) lack a legal mandate requiring them to recruit staff from diverse social groups. The Law on the Public RTV System of BiH (2005)[40] defines the obligations of public broadcasters regarding content pluralism, non-discrimination, and equal audience access, but does not prescribe quotas or mandatory measures for workforce diversity. The Statute of BHRT does not mention diversity of employees.[41] Codes of conduct and editorial guidelines emphasise professional standards, impartiality, and programming balance, but they do not regulate workforce composition. Hiring practices at public broadcasters are governed by internal regulations and public vacancy announcements; while these formally require equal access for all candidates, there are no specific provisions mandating the representation of minority or marginalised groups. Commercial media outlets do not track or disclose data on workforce diversity. Newsrooms include journalists of various ethnicities and genders, reflecting the country's multi-ethnic context, but this is not the result of a formal mandate or policy. Studies by Mediacentar Sarajevo[42] and BH Novinari indicate that women predominate in lower-level journalism roles, whereas editorial and managerial positions are held mostly by men. Minority and marginalised groups (e.g., Roma, the LGBT+ community, persons with disabilities) are unrepresented in the workforce.

There are no publicly available documents or codes of conduct providing practical instructions for inclusive hiring and casting of performers and there is no union or association of actors and performers in Bosnia and Herzegovina likely to provide such guidelines. The Association of Filmmakers of B&H, theatre associations (SARTR, Kamerni teatar 55, East West Center), and collective management organisations for audiovisual authors focus on copyright, fees, and the promotion of domestic productions. Issues regarding the inclusion of people with disabilities or LGBTIQ+ people in the B&H film and theatre industries generally arise through individual projects connected to festivals or NGO initiatives rather than through formal union or professional guidelines.

Representation: In Bosnia and Herzegovina, public broadcasters (BHRT, FTV, RTRS) have a legal mandate to serve and represent diverse social groups; this mandate is defined primarily through content pluralism and equal access for the audience, rather than through explicit quotas or obligations regarding the representation of diverse groups. The Law on the Public RTV System of BiH (2005)[43] requires public broadcasters to ensure: pluralism and non-discrimination in programming, equal access for all citizens and content that reflects the country's cultural, linguistic, and social diversity. In practice, public service broadcasters meet these requirements through children's programmes, educational content, programmes for the

38. https://www.paragraf.ba/propisi/bih/zakon-o-javnom-radio-televizijskom-sistemu-bosne-i-hercegovine.html
39. https://www.ustavnisud.ba/public/down/USTAV_BOSNE_I_HERCEGOVINE_bos.pdf
40. https://www.paragraf.ba/propisi/bih/zakon-o-javnom-radio-televizijskom-sistemu-bosne-i-hercegovine.html
41. https://bhrt.ba/uploads/PDF%20dokumenti%202025/Statut%20BHRT.pdf
42. https://www.media.ba/sites/default/files/women_in_media_bih.pdf?utm_source=copilot.com
43. https://www.paragraf.ba/propisi/bih/zakon-o-javnom-radio-televizijskom-sistemu-bosne-i-hercegovine.html

diaspora and occasional programmes for minorities such as the Roma community. However, there are no mechanisms that would guarantee constant and proportional representation of all social groups.

It falls to independent monitoring to assess levels of representation. The study *Women in Media: Mapping the patterns of workplace harassment in Slovenia, Croatia, Serbia and Bosnia and Herzegovina - Comparative overview*[44] indicates that women dominate the journalism profession at lower-level positions, while men hold the majority of leadership roles. The 2025 round of the Global Media Monitoring Project for Bosnia and Herzegovina shows that gender imbalance in the media remains deeply entrenched, with patterns largely unchanged since 2020.[45] On the monitoring day (6 May 2025), 253 news stories across 20 traditional and digital media outlets were analysed, revealing that politics and government continue to dominate media agendas, while gender-based violence accounted for just 2 per cent of coverage and was completely absent from radio and television. Women remain systematically marginalised in decision-making and expert roles, appearing in only 4 per cent of political stories and 0 per cent of stories on the economy, science, and health. When women are visible, it is most often in the context of violence or entertainment, reinforcing harmful stereotypes rather than showcasing women as leaders, experts, or agents of change.[46]

Assessing the nature of representation for other groups is hampered by the absence of monitoring by RAK or media outlets themselves. Reports by academic or NGO monitors is rare and usually linked to occasions, such as elections. Minority ethnic groups occasionally appear in the news in the context of political topics or cultural events, but without systematic and consistent representation and there are complaints that some reporting stigmatises specific ethnic groups (eg Bosniaks, Serbs, Croats) through generalisations or negative narratives. Complaints about representation of faith groups also allege discrimination, in the form of hostile statements by politicians or the linking of certain religious communities to crime or extremism.

In regard to entertainment content, the economic crisis affecting public broadcasters severely limits their production of original drama, reality TV, comedy and so on. Any assessments of discriminatory representations are consequently based on regional production aired in Bosnia and Herzegovina. Minority groups appear occasionally in series or reality shows but are mostly stereotyped and without consistent visibility. Representation of faith groups tends to be sporadic and superficial, associated with holidays and cultural traditions. People with disabilities are almost invisible in entertainment content. Under-18s and over-60s may appear in talent shows and family series; women in reality shows and dramas are often seen in stereotypical roles. Portrayal of LGBTIQ+ communities is reserved for news, where representation is linked almost exclusively to violence, activism or scandal. Likewise low-income groups appear on the news in relation to items about social benefits, protests and crises, without systematic or positive representation. When it comes to populations in outlying and rural regions, these are featured less frequently than those in the main urban centres of Sarajevo, Banja Luka, and Mostar.

Consultation mechanisms: RAK includes women and men from diverse social groups in its work through advisory boards, consultative processes, and working groups. Efforts are made to ensure pluralism and a diversity of perspectives when making decisions regarding licensing, regulation, and the oversight of media content. This is achieved through commissions and consultative bodies that include representatives from academia, civil society and youth organisations, as well as experts from the media sector. RAK also has a Media and Information Literacy site listing experts whom it includes in activities, including ones related to diversity.[47]

44. https://www.media.ba/sites/default/files/women_in_media_bih.pdf?utm_source=copilot.com
45. https://www.newroadbih.org/index.php/en/gender-media-en/gmmp/item/756-gmmp-2025-country-report-bosnia-and-herzegovina.html
46. https://www.linkedin.com/posts/association-novi-put-3b1159202_gmmp-gmmp-share-7410616732488433664-pTXI/
47. https://medijskapismenost.ba/hr/lista-strucnjaka-iz-podrucja-medijske-i-informacijske-pismenosti/

RAK surveys on children's media use and attitudes are not regular since they are not part of its mandate. Such surveys are usually undertaken in cooperation with UNICEF or local NGOs. The most recent one, in 2026, entitled *Between Screens and Influence: Who Shapes Young People's Online Experiences?*,[48] emphasised the need to develop specific mechanisms for the participation of children and young people in shaping media policies, as they are the most affected by digital content and online influencers. As yet RAK has no formalised mechanisms for directly consulting children on media policies that affect them.

Exposing discrimination at work: BH Novinari, the most prominent journalists' association, has established a Free Media Help Line, which provides legal aid to journalists exposed to various forms of pressure, including discrimination at work. Journalists exposed to such pressures can fill in an online form and receive assistance.[49] There is also a Helpline for Human Rights Defenders[50]which lists strategic intimidatory lawsuits against journalists among the 17 cases documented between 2024 and 2026.

There is no unified, strong trade union for actors and performers in Bosnia and Herzegovina that systematically calls upon its members to report workplace discrimination. While associations and collective management organisations exist (e.g., the Association of Film Workers of BiH, theatre associations, and collective management organisations for audiovisual authors), their practices are fragmented and primarily focused on copyright and fees and not on issues of discrimination.

Handling complaints: The national human rights institution, the Human Rights Ombudsman/ Ombudsmen of BiH, receives citizens' complaints regarding discriminatory media activity, including advertising.[51] This body has the legal authority to act on such complaints, submitted in writing, via e-mail, or in person at the Ombudsmen's offices. Complaints may concern discriminatory reporting, stereotypes in advertising, hate speech, or unequal treatment in media content. The Ombudsmen analyse the case and may issue recommendations to media outlets, advertisers, or regulatory bodies.

RAK has formal authority to review citizens' complaints and sanction broadcasters for hate speech, discrimination etc. However, the process is administrative and closed: citizens submit complaints via a form or email, yet there are no publicly available reports on the outcomes of individual cases. Decisions are published only as press releases or brief news items, lacking detailed transparency regarding the procedure and decision-making criteria.

BHRT is a public broadcaster at the state level, yet its system for submitting and resolving complaints is underdeveloped and lacks transparency. Citizens can submit complaints via email or mail, but there are no publicly available reports on how complaints are processed or what measures have been taken.

Article 23 of the Press Council's Press and Online Media Code[52] sets out the Council's complaints process. Although the Council cannot impose sanctions, its Complaints Commission can negotiate with media outlets to remove offending content. Article 4 of the Code deals with discriminatory reporting. It states: "Journalists must avoid prejudicial or insulting references to a person's ethnic group, nationality, race, religion, gender, sexual orientation, physical disability or mental disability. References to a person's ethnic group, nationality, race, religion, gender, sexual orientation, physical disability or mental disability shall be made only when directly relevant to the occurrence being reported." The Council website lists all complaints and outcomes. [53]

48. https://www.unicef.org/bih/izvje%C5%A1taji/izme%C4%91u-ekrana-i-uticaja-ko-oblikuje-online-iskustva-mladih
49. https://bhnovinari.ba/bs/linija-za-pomoc/
50. https://bhnovinari.ba/en/2026/01/30/two-years-of-the-helpline-for-human-rights-defenders/
51. https://ombudsmen.gov.ba/Default.aspx?id=2&lang=BS
52. https://vzs.ba/en/press-and-online-media-code-of-bih/
53. https://vzs.ba/en/complaint-and-adjudications/



KOSOVO

Jeton Mehmeti

Regulatory powers: In Kosovo, the Independent Media Commission (*Komisioni i Pavarur i Mediave*, referred to here by its English initials, IMC) is the independent regulatory authority responsible for licensing, regulating and supervising audiovisual media services. Under Article 3(2.2) of the Law No. 04/L-44 on the IMC[54], the Commission is empowered to impose sanctions on licensed media service providers that violate its regulations or licensing conditions. Article 3(2.6) further authorises the Commission to adopt binding regulations governing audiovisual media services.

The IMC Code of Ethics for Media Service Providers[55] expressly prohibits incitement to hatred and violence. Article 3 prohibits the broadcasting of material that promotes or incites criminal activity or violence, while Article 5 prohibits direct or indirect incitement to discrimination, intolerance and hatred, including content targeting individuals or groups on grounds of ethnicity, religion, gender, sexual orientation or disability. Article 11 provides for sanctions in cases of violations of the Code.

Together, these provisions establish a legally binding regulatory framework under which the IMC is responsible for addressing incitement to violence or hatred by licensed audiovisual media providers. However, the legislation establishes regulatory enforcement powers rather than an explicit requirement to impose sanctions automatically in every individual case.

Regulation of online content: Although the IMC is responsible for licensing and regulating audiovisual media services its statutory powers do not extend to requiring social media companies and online platforms, such as Facebook, YouTube or TikTok, to protect users against incitement to violence or hatred. Online news media in Kosovo operate under a self-regulatory framework administered by the Press Council of Kosovo (*Këshilli i Mediave të Shkruara të Kosovës*, referred to here by its English initials PCK) as an independent, non-governmental self-regulatory body.[56]

According to its Statute of 21 October 2024, the Press Council's mandate covers print and online news media, including news agencies and multimedia content published online. Article 3 provides for the implementation of ethical standards and the handling of complaints concerning media content, including content published by news outlets through social media platforms. The Press Code of Kosovo explicitly prohibits the promotion of hatred and violence. In particular, Chapter III establishes professional obligations concerning incitement and hate speech, including discriminatory or threatening content targeting individuals or groups on grounds such as ethnicity, religion, gender, sexual orientation or disability. However, self-regulatory authority over journalistic content does not constitute statutory regulatory power over social media companies or digital platforms themselves.

The IMC has a legal mandate to protect children and minors from harmful audiovisual content, but its regulatory authority does not extend to imposing child-protection obligations on social media companies and online platforms such as Facebook, TikTok, YouTube or Instagram. Its Regulation IMC-2023/01 on the Protection of Children and Minors in Audiovisual Media Services establishes safeguards concerning potentially harmful audiovisual content, including content classification, scheduling restrictions and appropriate warnings.[57] But these apply only to media services falling within the IMC's regulatory jurisdiction. They do not confer general legal powers to require social media companies and online platforms to implement age verification, content moderation, search moderation or effective complaints-handling mechanisms for the protection of children.

54. https://cps.rks-gov.net/wp-content/uploads/2020/09/LAW_NO._04_L-044_ON_THE_INDEPENDENT_MEDIA_COMMISSION.pdf
55. https://www.kpm-ks.org/assets/cms/uploads/files/Legjislacioni/1493714855.8029.docx
56. https://presscouncil-ks.org/
57. https://www.kpm-ks.org/

Children's programming: Law No. 04/L-44 on the Independent Media Commission addresses both the promotion of locally produced programming and the protection of children and minors. Article 5(3)–(4) requires broadcasting policy to promote domestic production, educational and cultural programmes, particularly for young audiences. Article 22 establishes general licensing criteria, including the capacity to produce original programming and provide diverse content. Despite this the law does not establish specific quotas requiring licensed broadcasters to produce or broadcast a defined amount of original, locally made children's programming. That is to say: although local production and children's programming are addressed in the regulatory framework, there are no specific licensing criteria linking the two. The IMC has not conducted research into children's media use or attitudes.

Self-regulation: The Press Council of Kosovo (PCK)[58] is the principal self-regulatory body for print and online news media. Membership is conditional on adherence to the Kosovo Press Code, which explicitly requires journalists and editors to avoid encouraging discrimination and intolerance (Chapter I) and prohibits incitement to hatred, violence and discriminatory treatment based on personal characteristics (Chapter III). Under Article 5 of the PCK Statute (21 October 2024), applicants undergo a three-month monitoring period to assess compliance with the Press Code before the Council decides whether to admit them. Members are also required to sign both the Statute and the Press Code. Repeated violations of the Code may result in exclusion from membership. Thus the requirement to comply with anti-discrimination standards is incorporated into both the membership admission process and the continuing obligations of members.

The Association of Journalists of Kosovo (*Asociacioni i gazetarëve të kosovës* – referred to here as AJK), the country's principal professional journalists' association[59], promotes professional ethics and non-discrimination. Article 8 of its Statute explicitly commits the Association to opposing discrimination based on race, gender, religion, ethnicity, sexual orientation, disability and other personal status, while Article 12 requires members to respect the relevant professional code of ethics. The AJK website provides the Press Council of Kosovo's Code of Ethics as a reference for journalistic conduct. Chapter II(4) prohibits incitement to hatred or violence on grounds including race, religion, gender, sexual orientation, disability, age, ethnicity and nationality. Chapter III(2), concerning incitement and hate speech, further prohibits prejudicial and denigrating treatment of individuals or groups on these grounds. Language and geographical origin are not expressly identified as separate protected grounds but are covered by the Code's broader prohibitions against discrimination and intolerance.

National human rights institution: Kosovo's Ombudsperson Institution (*Institucioni i Avokatit të Popullit*)[60] is an independent national human rights institution that operates in strong alignment with the UN Paris Principles on which the top rating for NHRIs is based. It has a statutory mandate to investigate discrimination and initiate legal proceedings in certain circumstances. Under Article 9 of Law No. 05/L-021 on Protection from Discrimination[61] and Article 16 of Law No. 05/L-019 on the Ombudsperson[62], the Ombudsperson is empowered to receive and investigate complaints of discrimination, act on its own initiative, assist victims and refer suspected criminal offences to the competent authorities. Article 18 further authorises the Ombudsperson to initiate collective legal action before the competent court in discrimination cases affecting groups of people.

These powers are applied to discrimination in the media, including discriminatory conduct involving journalists, media workers or groups targeted through media-related activities. The Ombudsperson has also examined hate speech and discriminatory language in public and media discourse, notably in its ex officio Report No. 146/2021, published in December 2023.[63]

58. https://presscouncil-ks.org/
59. https://agk-ks.org/
60. https://oik-rks.org/en/about-us/
61. https://gzk.rks-gov.net/ActDetail.aspx?ActID=10924&langid=2
62. https://gzk.rks-gov.net/ActDetail.aspx?ActID=10922&langid=2
63. https://oik-rks.org/wp-content/uploads/2024/02/Raporti-EN_Digital.pdf

The investigation examined television debates, online news posts and associated social media discussions from 2020–2022, documenting patterns of ethnic hostility, including derogatory expressions directed at Kosovo Albanians and Serbs. Even though it is not a media regulator and does not directly impose sanctions on media outlets, it has powers to investigate breaches of laws that protect against discrimination in the media and take them to court.

Investigations have been conducted into prejudiced and hostile reporting based on religion and ethnicity but none have been documented into explicit allegations of antisemitism or Islamophobia. The Independent Media Commission's 2024 Annual Report, submitted to the Kosovo Parliament, documents an investigation and sanction concerning derogatory language targeting Roma, Ashkali and Egyptian communities in a television programme.

Access: Kosovo's Law No. 04/L-109 on Electronic Communications establishes a universal service framework under the supervision of the Regulatory Authority of Electronic and Postal Communications (*Autoriteti Rregullativ i Komunikimeve Elektronike dhe Po*stare – ARKEP)[64]. Article 4(1.38) defines universal service in terms of nationwide availability, specified quality and affordable prices, while Article 28 includes access to public communications networks and data communications and authorises ARKEP to define additional universal service obligations.

ARKEP Regulation No. 005/B/24[65] further strengthens consumer protection by requiring internet service providers to disclose contractual download and upload speeds and service quality conditions (Articles 2 and 6) and providing remedies where contracted performance is not delivered (Article 11). However, these provisions do not establish a universally applicable minimum broadband download/upload speed, measurable affordability threshold or demonstrated nationwide enforcement mechanism for broadband provision sufficient to access the full range of national digital media. The requirements primarily concern universal communications services and the quality of commercially contracted internet services.

In practice, Kosovo has achieved near universal broadband availability, including in remote and mountainous areas. Through the World Bank-supported Kosovo Digital Economy (KODE) project, broadband infrastructure was extended to the country's remaining underserved rural settlements.[66] The European Commission's 2025 Kosovo Report confirms 100 per cent broadband coverage.[67] However, since comprehensive digital media access is not explicitly guaranteed through universal-service legislation, differences in affordability, subscription and service quality may still affect individual households.

Kosovo's regulatory framework contains accessibility provisions for people with visual and hearing impairments, although obligations differ between commercial audiovisual media providers and the public broadcaster. Article 34 of Law No. 04/L-044 on the Independent Media Commission[68] requires the IMC to encourage audiovisual media service providers to make their services progressively accessible to people with hearing and visual impairments. This is a promotional rather than a directly enforceable obligation on all licensed broadcasters. Stronger requirements apply to the public broadcaster, Radio Television of Kosovo (RTK).[69] Article 7(1.11)–(1.12) of Law No. 04/L-046 on RTK requires the provision of content for people with sensory disabilities using adapted technologies and particular attention to their access to programmes and information. RTK is also required to comply with IMC regulations and operates under an IMC licence.

Although the IMC has general monitoring and complaints-handling responsibilities, its annual reports do not document systematic accessibility-specific monitoring or enforcement. The strongest binding accessibility obligation applies specifically to RTK rather than to all licensed media providers.

64. https://www.arkep-rks.org/desk/inc/media/509E7D00-87BA-4897-AEBB-900C559B4633.pdf
65. https://arkep-rks.org/desk/inc/media/58BFD0D9-282A-4D7C-A924-180A86226108.pdf
66. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2851
67. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025SC0752
68. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2809&langid=2
69. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2812&langid=2

Community media and minority languages: Kosovo's legislation guarantees non-majority communities the right to establish and operate media in their own languages. Article 6 of Law No. 03/L-047 on the Protection and Promotion of the Rights of Communities provides for minority-language media and reserved broadcasting frequencies.[70] Under Article 2 of Law No. 04/L-044 on the Independent Media Commission, private broadcasters may be registered as either non-governmental organisations or commercial businesses.[71] However, the licensing framework does not establish a separate, more lenient regime specifically for not-for-profit community media operating in minority languages. The same general licensing requirements apply.

Kosovo's public service broadcaster, RTK, has statutory obligations to provide programming in Serbian and other non-majority community languages. Law No. 04/L-046 on Radio Television of Kosovo provides for a dedicated Serbian-language television channel and programming in other community languages (Article 8).[72] However, these provisions primarily concern the production and broadcasting of minority-language content rather than an explicit obligation to translate or subtitle existing Albanian-language programmes into minority languages. In the absence of any equivalent duty placed on the holders of commercial audiovisual media licences, there is no comprehensive obligation to translate majority-language audiovisual content across the broadcasting sector.

Workforce recruitment: The IMC is under no specific legal obligation to collect or monitor workforce diversity data from licensed broadcasters. Its *2024 Annual Report* documents regulatory monitoring activities but contains no evidence of regular assessments of the demographic composition of licensed media organisations' employees, whether by gender, ethnicity or other diversity characteristics.

However, the IMC does pay attention to gender and ethnic representation within its own institutional structure, as shown in the disaggregated workforce statistics published in its 2024 and 2025 annual reports. In 2025, the IMC Executive Office employed 30 civil servants, comprising 18 women and 12 men, including two employees from non-majority communities. Article 11 of Law No. 04/L-044[73] on the IMC provides for representation of non-majority communities in the Commission's governing body; public nomination procedures specifically addressing majority and non-majority community representation are documented in the 2024 Annual Report. In other words, there is evidence of selected diversity measures but no systematic, comprehensive policy.

Law No. 04/L-046 on Radio Television of Kosovo (RTK) establishes specific diversity requirements for selected governance and appointment structures. Article 25(6) requires the RTK Board to reflect Kosovo's multi-ethnic and gender composition, reserving at least two positions for members of the Serbian community, one for another non-majority community and two for women. Article 35(1.2) of the law requires ethnic diversity in the working group responsible for selecting the director of the Serbian-language television channel. Again, these provisions call for representation of named groups for selected institutional positions. On the other hand, since RTK operates services in Albanian, Serbian and other non-majority community languages, this provides indirect evidence of employment opportunities for staff with different linguistic backgrounds. Overall, diversity in RTK recruitment can be inferred only to a limited extent, an observation reinforced by the fact that the Ombudsperson's Annual Report for 2024 identified procedural shortcomings and transparency concerns in an RTK senior-management recruitment process, illustrating weaknesses in recruitment oversight.

70. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2531
71. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2809&langid=2
72. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2812&langid=2
73. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2809&langid=2

While workforce diversity exists among Kosovo's leading commercial media outlets, there is no evidence of identifiable diversity-focused recruitment practices or outcomes. Some commercial media publicly advertise vacancies using gender-inclusive language, and women are visibly represented in journalism and newsroom positions, but research by the Association of Journalists of Kosovo[74] shows persistent gender disparities in senior editorial and managerial positions, particularly in larger private media organisations.

Although Kosovo has general legislation concerning the employment and inclusion of persons with disabilities, and regulations governing the recruitment of performing artists in public cultural institutions, the available evidence does not demonstrate union-led initiatives addressing accessible auditions, inclusive casting, reasonable accommodations or the participation of performers with disabilities in the entertainment industry. The same applies to guidance addressing inclusive language, gender identity, pronoun use, confidentiality or protection from discrimination during auditions and productions for performers who identify as LGBTIQ+. This is despite the fact that LGBTIQ+ civil society organisations and public institutions in Kosovo have developed broader resources on workplace inclusion and respectful communication.

Representation: RTK has a substantial but not comprehensive legally established mandate to serve and represent diverse groups in society, with particular obligations concerning ethnic and linguistic communities. Law No. 04/L-046 on RTK[75] requires programming in Albanian and Serbian and reserves 15 per cent of the programming schedule for other community languages (Article 8). Article 7 further requires RTK to represent the cultural achievements of non-majority communities, provide programming for children, teenagers and older people, address the needs of persons with disabilities through adapted technologies, and give attention to religious communities and other social groups. Article 18 additionally requires attention to the needs of minorities and persons with special needs.

Despite strong female representation in journalism, with approximately 65 per cent of AJK's 720 members being women,[76] recent media monitoring in Kosovo indicates substantial underrepresentation of women as subjects of news coverage. Research published by Democracy for Development (D4D) in February 2026 analysed 265,870 articles covering political developments in online media between September 2025 and January 2026 and found that only around 10 per cent of this coverage concerned women, compared with 90 per cent concerning men.[77] Although the D4D study focused specifically on political news, its findings are consistent with broader research documenting the marginalisation of women in political debates and news coverage and barriers to their occupying senior editorial and managerial positions. According to other research, women account for 29.4 per cent of top media managers and key editorial positions across television, radio and online media.[78]

RTK's mandate to serve different communities and social groups is unevenly implemented. The provision of dedicated Serbian-language television services and programming for other non-majority communities does not necessarily ensure balanced representation of these communities in mainstream news and current affairs. Likewise faith groups receive sporadic coverage linked to religious celebrations, cultural traditions and public affairs but no regular or systematic representation. Similarly for disability-related issues, which receive some attention, but without regular inclusion of persons with disabilities as news sources, experts or participants in public debates. Children, the elderly and people on low incomes are visible in targeted programming and public discussion of pensions, welfare, unemployment and living costs but their views are not always heard. Developments in outlying regions are covered but representation of regional perspectives is not proportionate in national news or other programming.

74. https://agk-ks.org/en/publications/position-and-safety-of-women-journalists-in-kosovo/
75. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2812
76. https://agk-ks.org/site/assets/files/3619/position_and_safety_of_women_journalists_in_kosovo_final_en.pdf
77. https://d4d-ks.org/en/infographics/how-much-space-is-given-to-women-and-men-in-online-media/
78. https://kosovo.mom-gmr.org/en/findings/indicators/

RTK's entertainment programming reflects some aspects of Kosovo's social and cultural diversity, particularly through music, cultural productions, children's programming and content serving different linguistic communities. The country's leading commercial broadcasters provide entertainment through reality television, music, comedy, talk shows and other popular formats but the way different social groups are represented in these programmes is not subject to monitoring.

Consultation mechanisms: The IMC has statutory provisions promoting gender and ethnic diversity in its decision-making body. Article 10(5) of Law No. 04/L-044 requires that at least two of the Commission's seven members come from non-Albanian communities and at least two should be women.[79] These provisions have been reflected in appointments, including the election of Commission members in April 2026, when women and representatives of non-majority communities were included.[80] However, the legal framework does not establish comparable representation requirements for other diverse groups, including persons with disabilities, LGBTIQ+ communities, different age groups or economically disadvantaged communities.

The Regulatory Authority for Electronic and Postal Communications (ARKEP) is governed by Law No. 04/L-109 on Electronic Communications. Article 78 establishes a five-member Board appointed by the Assembly of Kosovo, with selection criteria primarily based on professional expertise and experience. Although women have been appointed to the Board, including two women among the five members appointed in 2021, there are no obvious formal mechanisms to ensure the participation of different social groups in consultative or decision-making structures.

The IMC has demonstrated mechanisms for consulting children and child-rights stakeholders on media-related policies but these have no permanent basis. During the 2023 consultation process concerning the regulation on the protection of children and minors in audiovisual media services[81], children and relevant NGOs were invited to participate and contribute their views.[82] This practice is complemented by the IMC's cooperation with child-protection organisations, including the Coalition of NGOs for Child Protection (KOMF). In July 2024, the IMC and KOMF signed a joint declaration aimed at strengthening cooperation on children's protection and rights in the media.

Exposing discrimination at work: The Association of Journalists of Kosovo, the country's principal professional journalists' association, actively encourages journalists to share experiences of discrimination, harassment and unequal treatment in the workplace. Through research, interviews, focus groups, case reporting and its Network of Women Journalists, AJK provides opportunities for journalists to discuss discriminatory practices, including sexual harassment, gender-based discrimination, unequal career advancement and other workplace challenges. These activities are documented in AJK's 2025 report *Position and Safety of Women Journalists in Kosovo*[83] and its other research on women journalists' safety.[84] The association also advocates for stronger protection and support mechanisms for journalists experiencing discrimination and harassment.

The Trade Union Association of Actors of the National Theatre of Kosovo has demonstrated that it receives and represents concerns from its members regarding discriminatory treatment and unequal working conditions without necessarily having invited them to share these concerns. In 2016, union representatives publicly raised concerns about alleged discrimination

79. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2809
80. https://www.koha.net/en/arberi/kuvendi-zgjedh-anetaret-e-kpm-se
81. https://kpm-ks.org/cmsapi/content/media/3458a4f0-977f-45ab-af48-7d417cc4eebd.pdf
82. https://aip.rks-gov.net/en/commissioner-for-information-and-privacy-mrs-krenare-sogojeva-dermaku-participated-in-the-panel-privacy-and-identity-protection-during-the-round-table-organized-by-the-independent-media-commiss/
83. https://agk-ks.org/site/assets/files/3619/position_and_safety_of_women_journalists_in_kosovo_final_en.pdf
84. https://safejournalists.net/publication/kosovo-women-journalists%CC%95-safety-2024/

in the distribution of theatrical roles and employment opportunities.[85] The association has subsequently advocated for fair treatment of actors, including challenging their exclusion from professional support schemes and unequal employment conditions.[86] These activities indicate that actors can communicate workplace grievances to their union and that the association may raise these concerns collectively.

Handling complaints: The Ombudsperson Institution of Kosovo accepts complaints alleging discrimination, including complaints against private entities.[87] Its mandate extends to discriminatory conduct by media organisations, including discriminatory media content and advertising where these fall within the scope of anti-discrimination legislation. It provides accessible mechanisms for complaint submission, including in-person reporting, email, post and a free telephone line.

The IMC has established legal procedures for receiving, examining and deciding complaints concerning audiovisual media content, including complaints involving discriminatory representation, hate speech and violations of broadcasting standards. However, the existence of such procedures does not necessarily demonstrate that complaints are currently handled through a robust, transparent and consistently applied process. In fact, the IMC faced significant criticism during 2026 from journalists' associations, media organisations and legal experts concerning the transparency, legality, independence and proportionality of its regulatory decisions.[88] In June 2026, the Kosovo Law Institute publicly challenged the legal basis of certain IMC sanctions, while the Press Council of Kosovo raised concerns about regulatory pressure on broadcasters and the need for impartial decision-making. These concerns were also reflected in the European Commission's *2026 Kosovo Report*, which highlighted criticism of the IMC's rulings and fines, questions regarding their legality, and the continued dysfunction of its Appeals Board.[89]

Radio Television of Kosovo (RTK) is legally required to receive and address public complaints and to uphold editorial standards prohibiting discriminatory content. Articles 10 and 18 of Law No. 04/L-046 provide the legal basis for these obligations. However, independent assessments have identified weaknesses in RTK's editorial accountability, institutional transparency and public engagement. The Association of Journalists of Kosovo's media freedom assessment highlights the absence of consolidated practices for regular public consultation and concerns about editorial accountability.[90] The European Commission has also called for improvements in RTK's editorial independence and accountability.[91]

The Press Council of Kosovo is the principal self-regulatory body for print and digital news media. It operates an established complaints-handling mechanism based on the Kosovo Press Code, which explicitly prohibits discrimination, incitement to hatred, stereotyping and derogatory reporting concerning diverse social groups. The Council demonstrates transparency by regularly publishing its decisions on complaints, including the identity of the media outlets concerned, the ethical provisions examined and the outcomes of its deliberations.[92] Its published decisions distinguish between complaints that are upheld, partially upheld, rejected or declared inadmissible, providing a clear public record of its work. The Council also uses mediation to resolve certain disputes.

85. https://kallxo.com/shkurt/punetoret-e-teatrit-kombetar-ankohen-per-diskriminim/
86. https://www.koha.net/en/kulture/porosite-e-ministrit-pezullojne-greven-e-teatrit-kombetar-1
87. https://oik-rks.org/en/
88. https://kli-ks.org/en/kli-imc-decisions-are-seriously-undermining-media-freedom-in-kosovo/
89. https://enlargement.ec.europa.eu/document/download/fbf2d883-1d14-4e09-8aba-c904ba0d5d9b_en?filename=kosovo-report-2026.pdf
90. https://www.agk-ks.org/site/assets/files/3933/index_kos-eng_2025.pdf
91. https://enlargement.ec.europa.eu/document/download/c790738e-4cf6-4a43-a8a9-43c1b6f01e10_en?filename=Kosovo+Report+2024.pdf
92. https://presscouncil-ks.org/?lang=en&p=18576



MONTENEGRO

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Regulatory powers: The Agency for Audiovisual Media Services (*Agencija za audiovizuelne medijske usluge Crne Gore* – AMU)[93], the national regulatory authority responsible for licensing audiovisual media service providers, is legally required to act where violations of the Law on Audiovisual Media Services are established. Article 15(2) of the Law prohibits audiovisual media services from inciting violence, hatred, intolerance or discrimination on a wide range of protected grounds. Under Article 180, where a violation is established through supervision, AMU is required to take the administrative measures provided by law. These may include warnings, fines, and temporary or permanent withdrawal of a broadcasting licence (Articles 181–184).

Over the past year alone, the Agency for Audiovisual Media Services (AMU) has imposed sanctions or initiated several proceedings, mostly involving television channels from neighbouring Serbia or broadcasters owned by Serbian companies or individuals, over content found to incite hatred, intolerance or discrimination. The measures ranged from a EUR 500 fine against TV Adria, to six-month restrictions on the retransmission of specific programmes**,** a six-month restriction on the retransmission of the entire Informer TV channel, and, in June 2026, maximum fines of EUR 10,000 each imposed on TV Adria and TV Prva.

Regulation of online content: The AMU does not currently have general regulatory powers over social media platforms. Its powers under the Law on Audiovisual Media Services extend specifically to video-sharing platform services falling within the scope of the law. Broader regulation of social media and online platforms is addressed through Montenegro's Digital Services Act (DSA) implementing framework, contained in 2026 legislation implementing the EU Digital Services Act, which will become fully applicable upon Montenegro's accession to the European Union. However, Article 128 of the existing law on audiovisual media requires such providers to take appropriate measures to protect the public from user-generated content that incites violence, hatred or intolerance on protected grounds.

Meanwhile the AMU is empowered to supervise and take measures against video-sharing platform providers. In parallel, the Law on the Implementation of Regulation (EU) 2022/2065 on Digital Services, adopted in October 2026,[94] establishes the national institutional, procedural and enforcement framework for the application of the DSA, including supervision, user complaints and protection, sanctions, and the designation of a Digital Services Coordinator. The AMU is designated as Montenegro's Digital Services Coordinator and will serve as the single contact point for cooperation with the European Commission, the European Board for Digital Services and coordinators in other Member States.

However, adoption of the law does not yet make the broader DSA supervisory framework over social media and online platforms operational in Montenegro. Although the law enters into force eight days after its publication in the Official Gazette, its main supervisory and enforcement provisions will apply only from the date of Montenegro's accession to the EU. Montenegro currently aims for EU membership by 2028, but this remains a political target rather than a legally fixed accession date. Pending accession, there are no specific rules addressing the responsibilities of online platforms in moderating harmful content. Council of Europe analysis of the situation in Montenegro shows that digital space is a key arena for the spread of hate speech and discrimination, but also a grey area of responsibility. Media outlets invoke the "freedom of users" and technical inability to exert control, even though standard tools for moderation, user registration, and responsible commenting are readily available. Local portals

93. https://amu.me/en/
94. https://www.sluzbenilist.me/propisi/399147?page=2

and national media often serve as safe zones for exclusionary language, while institutions responsible for regulation and protection remain silent or respond in a merely formal manner.[95]

Children's programming: The Law on Audiovisual Media Services requires broadcasters to specify their programme structure and share of own-production content, while the Rulebook on Programme Standards sets general minimum quotas for own production (25 per cent for commercial TV and 30 per cent for public TV). Although the Rulebook recognises programmes for minors as a separate programme category, neither the Law nor the Rulebook establishes a specific quota for original locally produced children's content.

Self-regulation: The Media Council for Self-Regulation (*Medijski savjet za samoregulaciju* – MSS), Montenegro's principal self-regulatory body covering print, electronic and online news media, makes membership conditional on acceptance of the Code of Ethics of Montenegrin Journalists and adherence to professional and responsible journalism. The Code expressly prohibits content likely to generate hostility or hatred on grounds including race, ethnicity, nationality, gender, disability, religion and political affiliation, and requires journalists to avoid contributing to the spread of ethnic hatred. However, the effectiveness of self-regulation remains limited. The SEENPM/Montenegro Media Institute's report Weak Mechanisms and Outdated Code of Ethics: Media Self-Regulation in Montenegro[96] identifies fragmentation, limited reach and weak enforcement as key shortcomings of the system. Media Pluralism Monitor assessments similarly indicate that self-regulatory mechanisms exist but remain insufficiently effective in ensuring consistent compliance with professional and ethical standards across the media sector.[97]

The Code of Ethics of Montenegrin Journalists[98] explicitly establishes the principle that media outlets must not publish content intended to incite hostility or hatred against persons on the grounds of their race, ethnic origin, nationality, age, place of origin, religion, sex, gender, sexual orientation, gender identity, physical or mental condition or illness, or political affiliation. It states that particular care must be taken to avoid any form of incitement to gender-based violence, ethnic hatred or content that directly or indirectly promotes hostility or hatred, is intended to create a climate of intolerance and discrimination in society, particularly in regard to vulnerable and marginalised groups. The code requires journalists and media organisations to strive to promote tolerance, provide counternarratives to hate speech, and challenge harmful stereotypes.

National human rights institution: Montenegro has an independent national human rights institution, the Protector of Human Rights and Freedoms (*Zaštitnik ljudskih prava i sloboda Crne Gore* – Ombudsman of Montenegro), with powers to investigate complaints concerning discrimination, including discrimination by private legal entities such as media organisations, and to issue findings and recommendations. Although the Ombudsman is not authorised to represent complainants before ordinary courts or to bring legal remedies on their behalf, the Council of Europe's 2026 report *Mapping Hate Speech in Montenegro*[99] shows that the Ombudsperson is often the only actor responding to hate speech and discrimination. However, its findings and recommendations are not binding and are frequently ignored.

Neither antisemitism nor Islamophobia have been specifically identified in cases taken up by the Ombudsman, although there have been cases and public reactions concerning discrimination on the grounds of religion or national affiliation, as well as hate speech targeting Muslim and Bosniak communities. The Ombudsman has however addressed alleged cases of

95. https://www.coe.int/en/web/podgorica/-/mapping-hate-speech-in-montenegro-highlights-need-for-awareness-education-and-stronger-institutional-response
96. https://www.mminstitute.org/wp-content/uploads/2023/11/Ourmedia_MNE-ENG_23-11-21.pdf
97. https://cmpf.eui.eu/country/montenegro-2026/
98. https://montenegro.osce.org/mission-montenegro/666356
99. https://www.cedem.me/wp-content/uploads/2026/03/HATE-SPEECH-Mapping-Report-final-1.pdf

discriminatory and hostile reporting based on religion or ethnicity, pointing to violations of the prohibition of discrimination, misuse of freedom of expression, attacks on human dignity, collective stigmatisation, and forms of expression capable of inciting intolerance, hostility or hatred against members of particular ethnic or religious communities.

This assessment is supported by broader monitoring evidence. The 2025 report on Montenegro by the Council of Europe's European Commission Against Racism and Intolerance (ECRI) identifies ethnicity as a recurrent basis of hate speech and notes that such speech often has a religious dimension.[100] Similarly, the Reporting Diversity Network/CIN-CG monitoring for 2024–2025 found ethnicity to be the most frequently targeted identity, with religious hostility often overlapping with ethnic hate.[101] These findings indicate that prejudiced and hostile expression based on ethnicity and religion is not limited to isolated cases, but represents a recurring pattern in the media and public discourse. The 2026 Council of Europe/CEDEM report Mapping of Hate Speech in Montenegro finds that hate speech has become increasingly normalised, particularly online, and identifies persistent weaknesses in institutional responses and the protection of affected and marginalised groups.[102] The same report concluded that the most affected groups are women, female politicians, LGBTI persons, Roma, persons with disabilities, ethnic and religious minorities, as well as some clergy and activists, while media play a dual role – both as transmitters and as targets, with frequent ethical lapses driven by clicks and profit.

Access: The Law on Electronic Communications, No. 100/24, Article 45, requires adequate broadband internet access of prescribed quality to be available to all consumers throughout Montenegro at affordable prices, irrespective of geographical location. The regulator is the Agency for Electronic Communications and Postal Services of Montenegro (*Agencija za elektronske komunikacije i poštansku djelatnost* – EKIP), which supervises compliance with the prescribed quality standards for universal service. According to EKIP's 2025 survey, satisfaction with internet quality remained relatively high at 75.2 per cent, although it fell from 81.5 per cent in 2024. At the same time, 40.7 per cent of users reported service disruptions or interruptions during the previous year, while poor internet speeds and service interruptions remained the main reasons for contacting internet providers' customer support.[103]

Since the public service media signal coverage is mandated by law and the regulatory framework provides for comparable access to digital media throughout the country, overall accessibility remains high.[104] The national public broadcaster, Radio and Television of Montenegro (*Radio i televizija Crne Gore* – RTCG) introduced an Over-the-Top (OTT) service to expand access to its content; live streaming of its programming is provided by the online platform and mobile application, MNEPlay, which was further developed in 2025 to also include archival materials, documentaries and children's programming. Data from the OECD Economic Convergence Scoreboard 2026 report for the Western Balkans shows that physical availability and signalling for the transmission of digital media and data are provided at an exceptionally high level.[105] However, telecommunications operators' investments are primarily focused on urban centres and the coastline, driven by tourism and profitability. Consequently, rural and northern regions of Montenegro still experience poorer fixed broadband internet coverage, which hinders the stable reception of advanced digital media in these areas.

The Law on Audiovisual Media Services (54/24) introduced accessibility obligations under Article 18 but these remain limited. Broadcasters are required to make only urgent information, such as public safety announcements, accessible to persons with disabilities, while broader

100. https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/montenegro
101. https://www.reportingdiversity.org/resources/monitoring-report-on-hate-speech-in-montenegro-2025/
102. https://www.cedem.me/wp-content/uploads/2026/03/HATE-SPEECH-Mapping-Report-final-1.pdf
103. https://nettest.ekip.me/en/o-aplikaciji
104. https://cmpf.eui.eu/country/montenegro-2026/
105. https://www.oecd.org/en/publications/economic-convergence-scoreboard-for-the-western-balkans-2026_0d625fbe-en.html

obligations are framed in general and progressive terms, without clearly defined minimum standards. The Rulebook on Accessibility of Audiovisual Media Services to Persons with Disabilities, applicable from 2024, requires measures such as subtitles, sign language interpretation and audio description. However, implementation is limited. In 2026, AMU found RTCG to be the only monitored broadcaster providing content adapted for persons with hearing impairments through a news programme with sign-language interpretation and called for further development of accessible content for persons with hearing and visual impairments. According to the Media Pluralism Monitor, other television stations — whether public or commercial — do not provide adapted programming. Montenegro does not have a standardised national sign language. Audio description services for visually impaired audiences are largely absent, with only occasional exceptions on public service media.

Community media and minority languages: Community media are not formally recognised in legislation. The closest category is that of "non-profit broadcaster". According to Article 42 of the Law on AVM Services (54/24), this status can be given to an educational, religious, student or non-governmental organisation which broadcasts a minimum 50 per cent of programming content of specific interest to the given community, of which at least half is the broadcaster's original production. In practice, this category of media is reserved to the outlets of religious communities, notably Serbian Orthodox and Muslim.

There is no general obligation for audiovisual media, including public service media, to systematically translate, subtitle or dub content produced in the Montenegrin language into minority languages. The legislation does, however, require public broadcasters to produce and broadcast dedicated programmes in minority languages and to take into account the information, cultural and identity-related needs of minority communities. These obligations are stipulated in the Law on Audiovisual Media Services (Article 44, No. 54/24) and the Law on the National Public Broadcaster – Public Media Service of Montenegro (Article 12, No. 60/24). Access to media content in minority languages is primarily ensured through RTCG and dedicated programmes and content produced in minority languages, rather than through the systematic translation of mainstream programming. RTCG broadcasts radio and television programmes in Albanian and Romani, as well as a regular news programme in Albanian and other formats addressing minority communities.

Overall, minority-language programming is concentrated in the public service broadcaster and a limited number of local or specialised outlets but remains largely absent from national commercial television. The AMU concluded in 2026 that particular attention should be paid to the production and/or provision of content in minority languages in Montenegro, especially Albanian and Romani.[106]

Workforce recruitment: AMU does not systematically monitor workforce diversity among licensed media service providers. The Law on Audiovisual Media Services and relevant AMU by-laws require broadcasters to provide information on their organisational structure, staffing arrangements and, in certain licensing procedures, the number and structure of employees engaged in programme production. But there is no requirement to collect workforce data disaggregated by gender, ethnicity/nationality, disability, age or other diversity characteristics.

AMU has regard to gender composition of its own workforce but does not actively promote other forms of diversity among its staff beyond compliance with legislation on employing people with disabilities. It operates under general non-discrimination and equal-treatment requirements, and its Statute lists the prohibition of discrimination and promotion of cultural and linguistic diversity among the principles guiding its work. General labour legislation also prohibits discrimination in recruitment, working conditions, training and promotion.

106. https://en.vijesti.me/news-b/society/820042/amu-about-vulnerable-social-groups—little-content-but-no-negative-reporting

In addition, statutory employment quotas for persons with disabilities apply to employers of AMU's size. In its 2025 report, AMU recorded 20 women and 10 men among its 30 employees. Available recruitment notices use gender-sensitive language but do not specifically encourage applications from underrepresented groups.

Although the Law on the National Public Broadcaster – Public Media Service of Montenegro and the RTCG Statute do not themselves prescribe general diversity quotas for RTCG staff, the broader legal and institutional framework establishes obligations and commitments concerning diversity in employment. Article 79 of the Constitution and Article 25 of the Law on Minority Rights and Freedoms guarantee proportional representation of minority peoples and other minority national communities in public services; this framework has also been explicitly applied by state authorities to RTCG and local public broadcasters. In addition, legislation on the professional rehabilitation and employment of persons with disabilities establishes employment quotas applicable to employers. Most directly, RTCG's formally adopted Environmental, Social and Governance (ESG) Strategy[107] sets the objective of increasing diversity among employees and management and expressly requires setting targets for recruitment from diverse social groups. RTCG has announced a target of 20 per cent greater diversity among employees and management by 2030. However, there are no publicly available reports on this target or how it would be achieved. RTCG is facing a crisis of legitimacy due to court rulings concerning the unlawful appointment of its Director General, political interference in the selection of members of its Council, and anti-union discrimination — issues that have been consistently raised by civil society organisations and trade unions. The European Commission also expressed concerns about governance practices at RTCG in its latest report, published in November 2026.[108]

At present RTCG can be seen to employ a diverse workforce, particularly in terms of gender and age. RTCG's Gender Equality Plan 2023–2027, based on data from its Central Information System, shows a relatively balanced gender composition: in 2022, 397 of 745 employees were men and 348 were women. Data for 2023 also show that both women and men are employed across RTCG's main organisational units, although their representation varies considerably between sectors. Evidence of age diversity is also available; for example, Radio Montenegro reported 88 employees, 29 of whom were over 60 years of age. RTCG additionally maintains dedicated minority-language editorial structures, including an Albanian-language newsroom. A government-led survey specifically collected data on the national/ethnic composition of employees of RTCG and other public broadcasters, although detailed current results disaggregated by ethnicity are not readily available in the public domain.

Evidence of workforce diversity can be established for leading commercial media in Montenegro, particularly with regard to gender, although comprehensive data covering other diversity characteristics are not publicly available. The selection of Vijesti and CdM as leading commercial media is supported by the 2025 IPSOS survey commissioned by AMU: among users of domestic digital media, vijesti.me was followed by 81 per cent and cdm.me by 59 per cent, while TV Vijesti was the leading television source of information. Vijesti provides relatively strong evidence of gender diversity. The current TV Vijesti masthead identifies both women and men in journalistic and senior management positions, including a female executive director and HR director, alongside a male editor-in-chief, production director and other senior staff. The Daily Press/Vijesti masthead similarly demonstrates the presence of women and men in management and editorial positions in the newspaper and online operation. Evidence for CdM is less comprehensive because its current masthead identifies only the director/editor-in-chief and does not publish a full list of newsroom staff. However, current CdM output and other publicly available sources confirm the professional participation of both female and male journalists/editors.

107. https://rtcg.me/rtcg/dokumenti/regulativa.html
108. https://enlargement.ec.europa.eu/document/download/1f32f797-9247-4cb5-8df8-4d6dd339b508_en?filename=montenegro-report-2026.pdf

Trade unions representing workers in Montenegro's cultural and performing arts sector include the Free Trade Union of Culture of Montenegro (*Slobodni Sindikat Kulture Crne Gore* – SSKCG),[109] whose membership includes trade union organisations from the Montenegrin National Theatre, Podgorica City Theatre, Nikšić Theatre, the Music Centre of Montenegro, Grad Teatar Budva and other cultural institutions, as well as individual artists. The union provides legal assistance, collective bargaining support and professional education and advocates for equal and safe working conditions. The sectoral collective agreement for culture regulates employment conditions and workers' rights but does not address casting, accessible auditions, reasonable adjustments for performers or specific practices for working with disabled performers. Professional associations such as the Montenegrin Actors' Association and the Association of Performing Artists are also active, and disability inclusion in the music industry has been discussed at sectoral events, but with no specific guidance on adjustments provided.

Montenegro has a broad anti-discrimination and LGBTIQ+ rights framework, including labour-law protections and a national LGBTIQ+ strategy, but these general protections are not reflected in trade union guidance identified concerning LGBTIQ+ inclusive casting, auditions or working practices. Likewise, no union guidance was found addressing inclusive terminology, pronouns, the treatment of transgender or non-binary performers, privacy regarding sexual orientation or gender identity, or the formulation of inclusive casting calls.

Representation: Montenegro's public service broadcaster, RTCG, has a clear legal mandate to serve and represent diverse groups in society. The Law on the National Public Broadcaster – Public Media Service of Montenegro, No. 60/2024, requires RTCG to provide programming for different segments of society, including national minorities and other minority communities, persons with disabilities, and other groups whose interests may be insufficiently represented in mainstream media. The Media Pluralism Monitor 2026 reports that RTCG regularly produces programmes for minorities and that its programming policies address the representation of specific social groups. However, RTCG continues to face significant public criticism regarding political influence on its editorial policy. In the case of non-profit and commercial media, legislation provides incentives for the production of content relevant to minority communities through the Media Diversity and Pluralism Fund[110], a mechanism established in 2020 under the Media Law (No. 60/24) which reportedly disbursed approximately €2 million for print, online media and broadcasters in 2025, although details of its impact are lacking.

Women remain significantly underrepresented in the top management and content of political and information media. The latest comprehensive quantitative data, from a Media Ownership Monitor report in 2023, show that women held 43.8 per cent of managerial positions, but only 6 per cent of the media outlets included in the sample had a woman as editor-in-chief.[111] More recent monitoring by the SMCG[112], covering 2025, confirms this trend, finding that although women account for more than 60 per cent of media employees, they remain underrepresented in senior decision-making positions, particularly as directors and editors-in-chief.[113] The Media Pluralism Monitor 2026 reaches a similar conclusion, noting that women continue to be underrepresented in the highest managerial positions and among editors-in-chief of the country's leading news media.

109. https://sskcg.me/
110. https://montenegro.mom-gmr.org/en/findings/media-regulation/
111. https://montenegro.mom-gmr.org/en/findings/findings/#!717e16ed45b3ca7086aea0aed927d1bf
112. https://sindikatmedija.me/en/
113. https://safejournalists.net/wp-content/uploads/2026/06/Montenegro-Indicators-on-the-Level-of-Media-Freedom-and-Journalists-Safety-Index-2025.pdf

Underrepresentation of women carries over to content. AMU monitoring[114] found that women accounted for only 26.47 per cent of items in the main news programmes of national television broadcasters, with the widest gender gaps recorded in coverage of politics, violence and crime, the economy, society and sports. Similar patterns were identified by the Media Ownership Monitor (2023), which found that men appeared as experts on media content roughly three times more often than women.

Beyond RTCG, coverage of diverse groups is inconsistent. The Council of Europe's Advisory Committee on the Framework Convention for the Protection of National Minorities notes a broad range of dedicated minority programming on RTCG, including daily Albanian-language news and programmes in Albanian and Romani, but calls for further mainstreaming of minority-related programming throughout regular broadcasting. The most recent AMU monitoring, conducted across 17 general television channels during March-May 2026, found that content devoted to vulnerable social groups accounted for only 1.25 per cent of the broadcasters' analysed in-house production. Of all identified content addressing vulnerable social groups (persons with disabilities, older persons, LGBTIQ people, Roma and Egyptians, women victims of violence, and economically disadvantaged families), public service broadcasters accounted for 68 per cent and commercial broadcasters for 32 per cent.

Available monitoring indicates an imbalance in the representation of religious communities. A 2025 analysis of RTCG content by the Centre for Civic Education found that coverage related to religious communities was disproportionately focused on the Serbian Orthodox Church, even though the latter also has its own media outlets such as Radio Svetigora, registered by the audiovisual regulator as a national non-profit specialised religious radio service, as well as an associated online portal. Other faith groups receive considerably less attention.

Children and young people have increasingly abandoned television as a medium while mainstream broadcasters, including the public service media, make very limited efforts to understand their needs, interests and media consumption habits or to develop content tailored to them. AMU produced a report in November 2025 entitled *Information on the Presence of Children's Programming in the Programmes of TV Broadcasters in Montenegro*, which covered 17 general television channels, of which eight were public and nine commercial.[115] A key finding was that, on average, children's programming accounts for only 2 per cent of the total content broadcast across all 17 channels, and this share has remained unchanged compared with the previous four years. The same study shows that people with disabilities accounted for 39 per cent of such content, followed by older persons (21 per cent) and the LGBTIQ+ population (15 per cent). Roma and Egyptians accounted for only 4 per cent, while economically disadvantaged families received the least attention, representing just 2 per cent of the analysed content.

AMU analyses show that commercial television broadcasters rely predominantly on acquired entertainment and film content rather than their own production. The available evidence suggests that some groups may appear on commercial TV only sporadically, featuring only in news items or talk shows, or be portrayed in stereotypical ways, particularly women, persons with disabilities and LGBTIQ persons.

Consultation mechanisms: Under the Law on Audiovisual Media Services, the Agency for Audiovisual Media Services is governed by the Council and the Director. The Council consists of five members nominated by different professional and civil society constituencies, including universities, NGOs working in the fields of human rights and media, the Montenegrin Academy of Sciences and Arts and the Montenegrin PEN Centre, and the Bar Association. This system

114. https://amu.me/wp-content/uploads/2025/01/Analiza-vidljivosti-zena-i-muskaraca-u-centralnim-informativnim-emisijama-nacionalnih-televizija-22.01.2025.pdf
115. https://amu.me/wp-content/uploads/2025/12/Informacija-o-zastupljenosti-programskih-sadrzaja-namijenjenih-djeci-u-programima-TV-emitera-novembar-2025.pdf

provides a degree of professional and sectoral pluralism. However, the Law does not prescribe gender quotas or specific requirements for the representation of persons belonging to different social groups, such as persons with disabilities, national minorities, Roma, young people or LGBTIQ persons.

The current composition of the Council does not demonstrate gender-balanced representation. Following the appointment of the fifth Council member in October 2026, all five Council members are men. Women are represented in the executive structure of the regulator, including the position of Director, but not in the Council, which is the main collegial decision-making body. This is particularly relevant in light of the 2026 Law on Gender Equality, which requires gender-balanced representation in regulatory and advisory bodies and treats any level of representation of one sex below 40 per cent as unequal.

The national telecommunications regulator, EKIP, includes both women and men in its senior decision-making structures. The current five-member Council consists of four men and one woman, while the current acting Director is a woman. The Law on Electronic Communications explicitly requires Parliament to take gender equality into account when appointing Council members. However, there would need to be at least two women on the five-member Council to meet the 40 per cent benchmark for balanced representation established by the 2026 Law on Gender Equality. The legal framework also provides for civil society participation in the commission selecting Council candidates and requires public consultations, including an accessible consultation mechanism for persons with disabilities. Nevertheless, these mechanisms concern participation in selection and consultation processes rather than guaranteed membership in the regulator's advisory or decision-making bodies. There are no statutory provisions reserving or ensuring representation in the Council for persons with disabilities, national or ethnic minorities, Roma, young people, LGBTIQ persons or other social groups.

Consultation on children's media use is seen in the national media regulator's published research. In 2018, the then Agency for Electronic Media, in cooperation with UNICEF, conducted the nationally representative study Children, Parents and Media in Montenegro, surveying 655 children aged 9–17 and 1,050 parents. A comparable study was conducted again in 2022, in cooperation with the OSCE Mission to Montenegro, involving 675 children aged 9–17 and 1,050 parents.[116] The studies examined children's use of television, the internet, mobile devices and social media, time spent using media, exposure to risks and misinformation, as well as children's attitudes towards media and parental control. The 2022 results were also compared with the 2018 findings, allowing changes in children's media habits to be tracked over time.[117] However, there have been no similar surveys since 2022. The media literacy surveys conducted in 2023 and 2026 cover the broader population, with the 2026 survey including respondents aged 16–75. The regulator continues to monitor children's programming and carries out extensive media literacy activities for children, but its 2027 work plan does not envisage a new survey specifically examining children's media use and attitudes.

The AMU has several mechanisms through which children's views and experiences can be captured indirectly. The Law requires public consultation on draft general acts, open to all interested stakeholders, while AMU has also conducted child-focused surveys and explicitly described research findings as a basis for developing its policies, priorities and targeted programmes. Children are additionally engaged through media literacy workshops and other interactive activities. However, the general public consultation procedure is not specifically adapted to children, and the 2024 consultation on programme standards — including provisions

116. https://montenegro.osce.org/mission-to-montenegro/534419
117. https://en.vijesti.me/amp/634198/oebs-children-spend-up-to-nine-hours-a-day-in-front-of-the-screen

concerning the protection of minors — recorded participation primarily by media-sector actors rather than children or organised child/youth representatives. Planned youth ambassador activities for 2027 may strengthen children's participation, but they are not yet operational and are primarily framed as media-literacy initiatives rather than formal policy consultation. Therefore, while there are meaningful channels for obtaining children's views and involving them in media-literacy activities, there is insufficient evidence of a systematic mechanism through which children are consulted as stakeholders in media policy making**.**

Exposing discrimination at work: The Trade Union of Media of Montenegro (SMCG) is the country's largest membership-based media workers' organisation, representing a substantial share of employees in the media sector. It provides its members with a permanent legal assistance service that explicitly covers workplace discrimination**,** alongside threats to safety and other labour rights violations. Members are invited to contact the Union and use this service, providing a direct channel through which experiences of workplace discrimination can be reported and discussed.

SMCG has also actively collected experiences of gender discrimination through surveys, interviews, focus groups and direct contact with affected women. Its 2020–2021 project on gender-based discrimination at work included a dedicated free legal-aid service for victims, an opinion survey and interviews, while more recent research on the safety and position of female journalists has continued to document experiences of discrimination, harassment and gender-based violence. The Union has additionally called for media organisations to establish internal procedures for reporting harassment and discrimination.

The main organisations representing actors and professional performers in Montenegro include the Association of Actors of Montenegro (*Udruženje glumaca Crne Gore* - UGCG) and the representative culture-sector trade unions, particularly the Free Trade Union of Culture of Montenegro (*Slobodni sindikat kulture Crne Gore* - SSKCG). UGCG explicitly advocates for actors' rights and fair working conditions, while SSKCG represents trade union organisations in major theatres and cultural institutions as well as individual artists and provides members with legal support in labour disputes.

There is clear evidence that discrimination and unequal treatment are recognised as relevant labour issues in these spheres. SSKCG, itself established partly in response to a perceived discriminatory treatment of a significant group of cultural workers, explicitly promotes equality and equal treatment, provides legal assistance, and invites workers to contact the union with questions and concerns. UGCG has also supported actors in labour disputes involving allegations of discrimination and has publicly opposed discrimination in the cultural sector. Despite this, it cannot be said that these bodies actively and systematically invite their members to share personal experiences of workplace discrimination.

Handling complaints: The Protector of Human Rights and Freedoms of Montenegro provides a public and accessible complaints mechanism for discrimination and explicitly invites citizens who consider themselves discriminated against to submit complaints. The mechanism applies to discriminatory acts, actions or omissions by both public authorities and private legal and natural persons, meaning that media organisations fall within its scope. Complaints are free of charge and can be submitted through several channels, and the Protector has a documented practice of dealing with discrimination cases falling within the category of public discourse and media.

This mandate also covers discriminatory conduct connected with advertising. Montenegro's Media Law expressly prohibits advertising that directly or indirectly spreads, encourages or justifies discrimination, hate speech or violence, while rules governing audiovisual commercial communications contain additional prohibitions on discriminatory and stereotypical advertising.

Since the Protector's anti-discrimination jurisdiction extends to private legal entities, citizens may use its general complaints mechanism in relation to discriminatory conduct by media organisations, including discriminatory advertising. Although the Protector does not appear to maintain a separate complaint form specifically labelled for discrimination in media or advertising, this does not materially limit access to the mechanism.

The Agency for Audiovisual Media Services (AMU) has a formal, accessible and transparent complaints procedure covering discriminatory and stereotypical representation in audiovisual media. Any natural or legal person may submit a complaint, including anonymously, and the regulatory framework expressly prohibits discriminatory treatment and stereotypical portrayals based on actual or presumed personal characteristics. Decisions are reasoned, subject to statutory deadlines and appeal, and are publicly available through AMU's online database [118]of complaints and regulatory decisions.

There is clear evidence that the mechanism operates in practice. Complaints and other submissions have resulted in warnings and financial penalties for discriminatory content, such as content targeting ethnic and national minorities, migrants, persons with disabilities and LGBTIQ persons. AMU also acts ex officio and may escalate sanctions where violations are repeated. In 2025, it issued several warnings and financial penalties for discriminatory and offensive speech, while in 2026 it imposed substantially stronger measures, including maximum fines of EUR 10,000 and restrictions on the retransmission of a foreign television service in cases involving repeated or serious hate speech and discrimination.

However, the effectiveness of regulatory enforcement has been subject to criticism. Under the previous legal framework, OSCE's Office for Democratic Institutions and Human Rights (ODIHR) found that some warnings failed to deter further violations and criticised the regulator's limited sanctioning powers, recommending a system of effective, proportionate and dissuasive sanctions. Civil society actors have also previously raised concerns about the consistency of regulatory intervention. More recent evidence shows that some broadcasters continued to disseminate discriminatory content after receiving warnings, resulting in repeated violations and subsequent fines. This raises questions about the deterrent effect of lower-level sanctions, although the stronger measures imposed in 2026 indicate that AMU is increasingly using the broader enforcement powers available under the current legal framework. Overall, the complaints mechanism itself is accessible, transparent and demonstrably capable of producing regulatory consequences. The documented criticism relates primarily to the historical limitations and deterrent effect of enforcement rather than to the transparency or accessibility of the complaints procedure.

Montenegro's national public service broadcaster, RTCG, has a formal and publicly accessible complaints mechanism administered by an Ombudsman[119] for viewers' and listeners' rights. Under the 2024 Law on the National Public Broadcaster – Public Media Service of Montenegro, the Ombudsman is independent and explicitly mandated to consider and decide on complaints from audiences, including violations of human rights and discrimination of any kind in broadcast content**.** The Ombudsman is also required to monitor gender equality and provide recommendations aimed at combating sexist stereotypes in programming and advertising and ensuring balanced representation of women and men.

The mechanism is transparent. RTCG provides public contact information for the Ombudsman and maintains an online archive containing individual complaint records, quarterly and annual Ombudsman reports, recommendations and related Council documents. The law expressly requires Ombudsman reports and recommendations to be published after consideration by

118. https://amu.me/obavjestenje/postupci-po-prigovorima/
119. https://rtcg.me/rtcg/_rtcg/savjet/ombudsman.html

the RTCG Council. Where breaches of professional principles and standards are established, the Council may require corrective action, including preventing further broadcasting of problematic content and initiating proceedings to establish the responsibility of the person concerned.

There is also evidence that the mechanism has been effective in cases involving discriminatory or stereotypical reporting. In 2022, numerous complaints concerning a presenter's comments that could be understood as blaming women for violence against them were upheld following the Ombudsman's assessment, and disciplinary proceedings were initiated. The current Ombudsman mechanism remains active, with numerous complaints and reasoned findings published during 2025 and 2026. There is, however, evidence of shortcomings in the practical operation of the mechanism in previous years. Civil society organisations criticised delays in responding to complaints in 2023, insufficient visibility of the complaints mechanism and Ombudsman reports, and an instance in which the RTCG Council was accused of improperly overturning an Ombudsman finding. A particularly significant weakness occurred in 2024, when RTCG remained without an Ombudsman for a period of time, resulting in some complaints becoming time-barred and complainants being asked to resubmit them. Appointment procedures in 2024 were also publicly contested.

The Media Self-Regulation Council of Montenegro (MSS) is the principal external self-regulatory body covering print and online news media. Its membership has expanded substantially following the 2024 Media Law and currently includes 79 media outlets. The MSS operates a dedicated Monitoring and Complaints Commission, publicly accepts complaints concerning breaches of the Journalists' Code, seeks responses from the media concerned, uses mediation where appropriate, and publishes individual decisions and information on mediation as well as annual reports. The revised Journalists' Code expressly prohibits hate speech and discriminatory treatment based on characteristics including race, ethnicity, nationality, religion, sex, sexual orientation, gender identity and disability.

There is evidence that the mechanism produces practical results. In 2025, the MSS received 29 complaints; four cases were resolved through mediation and breaches of the Code were established in three cases, with the media concerned complying with the requirement to publish the Commission's decisions. A 2026 complaint concerning intolerant and potentially discriminatory user comments on Portal Analitika resulted in the removal of the comments, acknowledgement of a moderation failure and a commitment to strengthen moderation of content involving intolerance, discrimination and hate speech. Decisions and mediation outcomes are publicly available, providing a significant degree of transparency.

However, important limitations remain. MSS jurisdiction extends only to its members, although its membership has increased significantly. Its decisions are self-regulatory and therefore rely primarily on publication, correction, mediation and reputational accountability rather than coercive sanctions. Earlier OSCE research identified inconsistent implementation of self-regulation, limited compliance by some media managements and very low public awareness: 74 per cent of citizens surveyed in 2024 were unfamiliar with media self-regulation. [120]These findings predate the substantial expansion and strengthening of the system after the 2024 Media Law, and more recent evidence indicates improved operation and compliance.

120. https://cdn.osce.org/sites/default/files/f/documents/e/9/578866.pdf



NORTH MACEDONIA

Petrit Sarachini

Regulatory powers: The Law on Media[121], enacted in 2013 and amended five times between then and 2025, expressly prohibits in Article 4(2) the publication or broadcasting of content that incites or spreads discrimination, intolerance, violence or hatred on grounds including race, colour, national or ethnic origin, sex, membership of a marginalised group, language, citizenship, religion or belief, disability, age, health status, personal characteristics, social status or other grounds. Article 4(1) also prohibits certain content involving threats to national security, violent overthrow of the constitutional order, terrorism, racism and xenophobia.

For audio and audiovisual media services, the specific regulatory framework is the Law on Audio and Audiovisual Media Services (LAAVMS),[122] enacted in 2013 and amended 13 times between 2013 and 2025. Its Article 48(1)–(2) prohibits audio and audiovisual media services from carrying programmes, video spots or commercial communications with content that incites or spreads discrimination, intolerance, violence or hatred. Article 22 assigns responsibility for monitoring programmes to the Agency for Audio and Audiovisual Media Services (AVMU by its acronym in Macedonian). Article 23 provides for regulatory measures where violations of the law or related regulatory requirements are established, including a public warning, the initiation of misdemeanour proceedings in specified circumstances, licence revocation or removal from the relevant register. Article 147(1), point 10, also provides for fines for specified violations involving the broadcasting of prohibited content.

Since Article 1(2) of the Law on Media explicitly states that media content is not the subject of that law and that its provisions must not be interpreted as regulating content, the clearest basis for AVMU's content-monitoring and enforcement powers in relation to incitement to violence or hatred is the LAAVMS, particularly Articles 22, 23 and 48. AVMU has taken action against broadcasters in cases involving discriminatory content and hate speech, although documented responses have included monitoring, public reporting, written notices and referrals to other institutions rather than consistently imposing direct sanctions. Publicised cases of such action are not recent.

In its Annual Report for 2016 AVMU documented two cases in which it identified hate speech in television programmes.[123] In one case, its monitoring of several editions of the *Milenko Nedelkovski Show* broadcast on national TV station Kanal 5 in January and February 2016 found that the programmes promoted discrimination, intolerance and hatred on the grounds of sexual orientation. AVMU notified Kanal 5 and Kanal 5 Plus in writing, published its monitoring findings and referred the material to the Commission for Protection against Discrimination (KSZD – by its acronym in Macedonian) for further action. The report explained that, under the legislation then in force, AVMU did not have statutory powers to impose a specific sanction for a violation of Article 48.

In May 2017 AVMU found that a report broadcast by Alfa TV contained discrimination against Roma on the grounds of ethnicity and membership of a marginalised group.[124] It published its findings, notified the broadcaster and referred the material to the KSZD, which subsequently informed AVMU that it had also established discrimination. In March 2018 AVMU found that an edition of the *Milenko Nedelkovski Show*, broadcast by Alfa TV, contained statements promoting discrimination, intolerance and hatred on ethnic grounds.[125] The Agency notified the

121. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-OI9M.pdf
122. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-9eUQ.pdf
123. https://avmu.mk/wp-content/uploads/2017/06/1._Godishen_izveshtaj_za_rabotata_na_AVMU_za_2016_godina.pdf
124. https://avmu.mk/wp-content/uploads/2017/06/Годишен-извештај-за-работа-на-АВМУ-за-2017-година.pdf
125. https://avmu.mk/2018/03/13/дискриминација-нетрпеливост-и-гово/

broadcaster and referred the recordings and monitoring report to the Basic Public Prosecutor's Office in Skopje and the KSZD, noting that the law at that time did not provide a specific regulatory measure for this violation.

These cases demonstrate that in the past AVMU has monitored and acted upon hate-speech and discriminatory content. However, given their historic nature, the available evidence does not establish a consistent pattern of direct sanctions specifically for incitement to violence or hatred under the current legal framework.

Regulation of online content: Following amendments to LAAVMS in 2023, North Macedonia introduced a specific legal framework for video-sharing platforms. Article 144-v requires video-sharing platform providers under the jurisdiction of the country to take appropriate measures to protect the public from programmes, user-generated videos and audiovisual commercial communications that spread, justify or incite hatred, violence or discrimination on grounds including race, ethnic origin, sex, gender, sexual orientation, gender identity, religion, disability, age and other protected characteristics.

Article 144-g requires providers, when aware of prohibited content covered by Article 144-v, to remove the relevant programme, user-generated video or audiovisual commercial communication, or block access to it, and to establish appropriate measures in their terms of service to prevent dissemination of prohibited content. Under Article 144-ѓ, AVMU assesses the measures taken by video-sharing platform providers under North Macedonian jurisdiction and supervises their implementation. Article 144-ж further requires providers to supply the Agency, upon request, with information relating to compliance with their statutory obligations.

These provisions give AVMU the legal basis to supervise compliance by video-sharing platform providers within its jurisdiction and establish statutory obligations for those providers to protect the public against specified forms of incitement to hatred and violence. The scope is nevertheless limited as the law does not establish general regulatory authority over every social media company or all online platforms, irrespective of their service type and jurisdiction. It is important to point out that while recent legal revisions aligned with the EU Audiovisual Media Services Directive (AVMSD) introduce initial obligations for video-sharing platforms, the regulator lacks direct enforcement powers or executive jurisdiction to sanction or control global social media networks (such as Facebook, X, or YouTube) for user-generated hate speech. In North Macedonia, this domain remains under Article 394-g of the Criminal Code[126] and is strictly the jurisdiction of the Public Prosecutor's Office, Ministry of Internal Affairs and the Cybercrime Department.

Children's programming: Article 144-v of the LAAVMS requires video-sharing platform providers under the jurisdiction of North Macedonia to take appropriate measures to protect minors from programmes, user-generated videos and audiovisual commercial communications that may harm their physical, mental or moral development. Article 144-g sets out the protective measures that platforms must establish and implement. These include age-verification systems for content that may be harmful to minors; parental-control systems; mechanisms allowing users to flag or report potentially harmful or illegal content; and transparent, accessible and effective procedures for processing and resolving user complaints. Providers must also establish measures to prevent the dissemination of prohibited content and, when aware of content covered by the relevant legal provisions, remove it or block access to it. Article 144-g additionally requires platforms to provide warnings and age-related indicators for content that may be unsuitable for minors. The legislation provides for fines in cases where providers fail to fulfil specified obligations.

126. https://jorm.gov.mk/wp-content/uploads/2016/03/законик-пречистен-текст.pdf

AVMU is responsible for supervising the implementation of the law's requirements concerning video-sharing platforms. However the scope of its supervision and protective age verification and other measures is limited to video-sharing platform providers falling under the country's jurisdiction; they do not grant AVMU unrestricted authority over every social media service or online platform. Where AVMU enforces strict content-rating and scheduling rules (such as acoustic and visual warnings, and late-night slotting) to protect minors, these powers apply only to traditional TV/radio and provider-curated catalogues. The regulator has no legal mechanism to mandate age verification or content moderation on third-party digital platforms or international social media companies.

Under the LAAVMS, broadcasters face specific quotas for domestic production, original European works, and independent programmes in general (Article 90 and Article 92). However, the legal framework and the broadcasting licences issued by AAAVMS do not establish specific, standalone quantitative quotas for locally originated children's content.

Self-regulation: The Council of Ethics of the Media in Macedonia (Macedonian acronym: SEMM) is the main self-regulatory body for all media outlets in the country. Point 2 of its Mandatory Criteria for Membership states that members have a duty to respect the Code of Journalists of Macedonia, the Charter on Ethical Reporting and the Statute of SEMM.[127] Article 14 of the Code of Journalists of Macedonia states: "Journalists shall not create or edit content that puts human rights and freedoms at risk. They shall not use hate speech, nor incite violence or discrimination on any basis."[128] This text, adopted by SEMM and the Association of Journalists of Macedonia in July 2026, replaced Article 10 of the previous Code from 2001, which specified grounds of discrimination. The previous article stated: "The journalist shall not knowingly create or process information that endangers human rights or freedoms, shall not use hate speech, and shall not incite violence or discrimination on any grounds (nationality, religion, race, gender, social status, language, sexual orientation, political affiliation…)." The new text, in Article 14, does not name specific grounds of discrimination but has a general provision regarding hate speech, incitement to violence and discrimination "on any basis."

The most prominent national journalists' association in North Macedonia is the Association of Journalists of Macedonia (AJM)[129], established in 1947. There is also the Independent Union of Journalists and Media Workers (Macedonian acronym: SSNM)[130], the largest union organisation in the media industry in the country. These organisations adhere to the Code of Journalists of Macedonia (first adopted in 2001 and most recently updated in 2026).

National human rights institution: North Macedonia has an independent Commission for Prevention and Protection against Discrimination (Macedonian acronym: KSZD).[131] Established by Parliament, which also elects its members, the Commission has a mandate to investigate complaints of discrimination related to public information and the media under Article 3(6) of the Law on Prevention and Protection against Discrimination.[132] Besides cases based on complaints from citizens, the Commission can initiate proceedings on its own initiative and participate in court proceedings concerning protection against discrimination. When a person or institution fails to comply with the Commission's decisions and recommendations, the Commission can also request the initiation of misdemeanour proceedings before the competent court.

The Commission's recent work confirms that its mandate has practical relevance to the media sector. Its annual report for 2025 recorded seven cases in which discrimination was established

127. https://semm.mk/pravila-za-chlenstvo/
128. https://semm.mk/kodeks-na-novinarite-na-makedonija/
129. https://znm.org.mk/
130. https://ssnm.org.mk/
131. https://kszd.mk/
132. https://kszd.mk/wp-content/uploads/2021/11/Закон-за-спречување-и-заштита-од-дискриминација.pdf

in the media and on social networks, or 13 per cent of cases.[133] Its 2024 report documented ten cases, amounting to 18 per cent of the total, in which discrimination on social media and in other media was established, including proceedings in which it participated as amicus curiae (friend of the court).[134]

The KSZD's key position is that hate speech and antisemitism containing elements of a criminal offence fall under the Criminal Code and are within the jurisdiction of the Public Prosecutor's Office and the Ministry of Internal Affairs, rather than the KSZD. Although the Commission has received and examined complaints related to antisemitism in the media in its practice, it has decided that these cases are not under its jurisdiction. An example of this was the complaint (case no: 08-118/8) received in February 2022 for alleged discrimination against the religious group Lev Tahor. Although the Commission investigated the case, in December that year it decided not to initiate formal proceedings and dismissed the complaint on grounds of lack of jurisdiction.[135] Nevertheless, it acts regularly on complaints regarding ethnicity and religion in the media, applying a strict distinction between discriminatory harassment and criminal hate speech. Some of the key rulings and practices in recent years include:

Social Media Harassment (February 2026): KSZD established harassment based on national and ethnic origin regarding a Facebook post titled "Sleeping with the Enemy." The author was ordered to remove the content within 30 days and cease publishing similar material.

Podcasts and Video Platforms (June 2024): In a case against an NGO hosting a YouTube podcast where a guest used derogatory terms against the Macedonian nation, KSZD established harassment based on nationality and ethnicity. The NGO was ordered to issue a public apology on its website.

Freedom of Expression vs. Harassment (2023–2024): In cases involving heated public debates (for example, about Macedonian-Bulgarian relations), the KSZD ruled no discrimination. It cited Article 10 of the European Convention on Human Rights (ECHR), which guarantees freedom of expression, stating that offensive political commentary does not automatically equal legal discrimination unless it systematically denies or restricts civil rights.

Religious Discrimination: While less frequent in traditional media, the KSZD establishes discrimination when public officials or media figures use public platforms to create a hostile or threatening environment against specific religious practices. Decisions have included recommendations for mandatory public apologies and immediate removal of the content.[136] Failure to comply would result in the Commission initiating misdemeanour proceedings under Article 27(4) of the Law on Prevention and Protection against Discrimination.

Access: The Law on Electronic Communications (LEC)[137] includes internet access within the scope of the Universal Service, managed by the Agency for Electronic Communications (Macedonian acronym: AEK)[138]. While the legal framework is robust and the National Operational Broadband Plan defines target parameters for rural network expansion and formally aims to eliminate white zones in rural and mountainous areas, significant infrastructural gaps persist in practice. Remote villages and mountainous regions face lower connection speeds and fewer technological options compared to major urban centres, meaning full access to a comprehensive range of digital media formats is guaranteed in theory but patchy in practice. Mechanisms to ensure affordability and guarantee minimum connection speeds for socially vulnerable groups or geographically isolated/mountainous regions face implementation delays and infrastructural gaps.

133. https://kszd.mk/извештај-на-ксзд-за-2025-година/
134. https://kszd.mk/wp-content/uploads/2025/04/Годишен-извештај-2024-КСЗД.pdf
135. https://kszd.mk/wp-content/uploads/2023/01/08-118-од-23.12.22-не-се-поведува-постапка.pdf
136. https://fra.europa.eu/en/databases/anti-muslim-hatred/case-law/9648
137. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-teno.pdf
138. https://aek.mk/

According to Article 110 of the LAAVMS, the public broadcasting service is obliged to "plan, develop, adapt, create and broadcast programmes intended for persons with sensory disabilities, namely persons with hearing and visual impairments." Amendments to this law adopted in July 2023 strengthened the obligations on private broadcasters. Article 26 now states that: "Media service providers are obliged to continuously and progressively implement appropriate and proportionate measures to make their services more accessible to persons with disabilities." In June 2024, AVMU adopted a Rulebook on Media Services Accessibility, requiring national television broadcasters to make at least one programme broadcast weekly accessible during the first year, with additional programmes introduced in subsequent years. Video-on-demand providers must make at least 2 per cent of their catalogue accessible in the first year, increasing the share by a further 2 per cent annually. Broadcasters must gradually make their programmes accessible to people with hearing and visual impairments, utilising sign language, subtitling, or audio description.

AVMU monitors this progress, and the public broadcaster (MRT) has introduced regular sign-language news programming and dedicated accessible content. AVMU published providers' accessibility action plans and programme overviews for 2025 (the latest available)[139] and conducted supervision of national television services in 2025. These are concrete monitoring measures, although the available evidence does not establish that all providers fully comply with the requirements. In fact, systematic follow-up and compliance across commercial television channels remain limited.

This is confirmed by RESIS Institute researchers in the report *Monitoring of Media Pluralism in the Digital Age*, published by Robert Schuman Centre for Advanced Studies of the European University Institute in 2024, which states that, although North Macedonia has laws that guarantee persons with disabilities access to the media and these were improved in 2023, their implementation remains weak, particularly among private broadcasters.[140] A significant portion of the audience with sensory disabilities still lacks adequate access to commercial digital broadcasting due to technological and financial limitations within the industry.

Community media and minority languages: The LAAVMS fully recognises and institutionalises non-profit community media and broadcasting in the languages of non-majority ethnic communities as structurally distinct categories with preferential treatment. As stated in Article 65, a "non-profit broadcasting institution may be established exclusively for radio broadcasting and only by educational, cultural and other institutions, as well as citizens' associations and foundations, with the aim of meeting the needs and interests of specific target groups". These broadcasters are established as a distinct type of media, and enjoy lenient regulatory conditions, including exemption from standard broadcasting licence fees (under Article 33 of Transitional Provisions) and alternative funding models through donations and sponsorships, although traditional commercial advertising is prohibited (Articles 79 and 99).

The legal framework guarantees the right to establish commercial, public, and non-profit media in the languages of ethnic communities. Article 45 obliges all broadcasters to foster cultural identity and linguistic diversity while local and regional commercial broadcasters that broadcast entirely or predominantly in a minority language enjoy targeted content adaptations (Articles 90 and 93) and lower administrative barriers under AAAVMS regulatory acts. In the public sector, Article 107 strictly mandates the public broadcaster, MRT, to provide distinct television and radio channels broadcasting comprehensively in Albanian, Turkish, Serbian, Roma, Vlach, and Bosnian languages. MRT2 offers TV in Albanian. MR3 radio is predominantly in Albanian, with daily segments in Turkish, Serbian, Roma, Vlach, and Bosnian languages. MRT4 TV is in Turkish, Serbian, Roma, Vlach, and Bosnian.

139. https://avmu.mk/en/2025/03/19/overview-of-accessible-programmes-for-persons-with-sensory-disabilities-in-2025/
140. Trpevska S, Miceski I, *Monitoring of Media Pluralism in the Digital Age*, European University Institute, Robert Schuman Centre for Advanced Studies, June 2024, https://cadmus.eui.eu/server/api/core/bitstreams/69e227c0-4f70-5bbb-9b3d-d115da405895/content

In practice, however, the non-profit community media sector remains mostly blank due to a lack of structural state subventions. While the legal status and lenient conditions are robust, data from the RESIS Institute's Media Pluralism Monitor shows a significant implementation gap. It states: "across the media landscape, local audiences, particularly those belonging to vulnerable, marginalised, minority-language groups and other local communities, have limited access and opportunities to exercise their communication rights. In the highly fragmented and politically polarised media sector as a whole, the needs of these local communities are inadequately met"[141]. In the commercial sector, print and electronic media broadcasting in community languages (such as Roma or Turkish) face acute financial precariousness, a highly fragmented advertising market, and a severe shortage of professional journalists, leaving them heavily reliant on external donor funding or marginalised to small local frequencies. These challenges are also confirmed in the 2026 Media Pluralism Monitor report of the Centre for Media Pluralism and Media Freedom.[142] It notes that, despite achieving some legal recognition, community media are still underdeveloped in terms of practice, neglected in terms of strategic policy making and the potential for their development is at a disadvantage due to lack of access to public funds (through a state subsidy scheme) or to capacity-building programmes.

For commercial licenses, the LAAVMS foresees that commercial media, besides the main official Macedonian language, can obtain licences and broadcast in the languages of minorities (Article 64, Usage of language). While Article 45 encourages cultural and linguistic pluralism, commercial media are under no strict mandatory requirements to translate Macedonian-language programming into minority languages, unless they are specifically licensed as minority-language commercial media.

Workforce recruitment: AVMU has no legal mandate to comprehensively monitor all aspects of diversity (such as disability or specific minority intersectional metrics) inside commercial media workforces. However, it does monitor specific target areas with some regularity but partially. AVMU routinely collects data and publishes structured annual reports on the media industry's workforce,[143] which include data by gender for licensed broadcasters (traditional TV and radio stations), examining the proportion of women and men in leadership, managerial, and editorial positions. It also examines the ethnic structure of employees in the media industry. Beyond gender and ethnic belonging, data on workforce diversity is intermittently left to professional organisational studies conducted by civil society bodies. SSNM conducted one such survey in cooperation with the RESIS Institute in 2024.[144]

As a public legal entity, AVMU is bound by the general Law on Public Sector Employees. Until the so-called "balancer" mechanism was abolished by the Constitutional Court in 2024,[145] all state institutions had to ensure enforcement of the constitutional principle for equitable representation of ethnic communities. AVMU seems to have maintained an internal gender and ethnic balance that aligns well with the State Statistical Office's broader metrics for public administration, where women are strongly represented in expert and managerial roles.[146] Even so, its specific diversity promotion policies are somewhat vague. The agency relies on standard state employment protocols rather than enforcing an independent, media-specific internal diversity plan with comprehensive quantified targets for marginalised or vulnerable groups.

Because of its obligation to guarantee dedicated television and radio channels broadcasting in the languages of non-majority ethnic communities, the MRT has explicit operational mandates to recruit and maintain staff from these specific ethnic groups to run these native-

141. https://cadmus.eui.eu/server/api/core/bitstreams/69e227c0-4f70-5bbb-9b3d-d115da405895/content
142. https://cmpf.eui.eu/country/the-republic-of-north-macedonia-2026/
143. https://avmu.mk/wp-content/uploads/2026/07/Структура-на-вработените-во-аудио-и-аудиовизуелната-медиумска-индустрија-во-2025-година.pdf
144. https://resis.mk/images/abut-us/PDF/rabotnite-uslovi-vo-mediumskiot-sektor.pdf
145. https://ustavensud.mk/2024/10/y-6p-90-2024-2/
146. https://avmu.mk/strucna-sluzba/

language services. AVMU data for 2025 show that 63 per cent of MRT employees were ethnic Macedonians, 26 per cent Albanians, 5 per cent Turks, 2 per cent Serbs, 2 per cent Vlachs, and about 1 per cent Roma and 1 per cent Bosnians.[147] There are no comparable recruitment mandates for other diverse groups, such as individuals with disabilities.

Comprehensive data from the RESIS Institute and SSNM covering 3,146 media job positions nationwide show minimal demonstrable diversity in recruitment within the commercial sector. In terms of gender, women make up about 51 per cent of regularly employed journalists.[148] In terms of ethnic representation, 78 per cent of employees come from the Macedonian ethnic community, 18 per cent are Albanians, while 6 per cent come from other smaller ethnic communities. In terms of broader social inclusion, national commercial television and radio stations operate strictly on market-driven models with no formalised corporate social responsibility policies or internal initiatives for diversity recruitment. Staffing remains homogenous, and marginalised demographics are rarely represented within commercial editing rooms. In Macedonian, Albanian and other language specific media, employees come predominantly from the respective ethnic community/language in which these media operate, which contributes to the phenomenon of parallel, ethno-centric media realities.

Actors and entertainment professionals are represented by the Union of Culture of the Republic of Macedonia (Macedonian acronym: SKRM)[149] and the Independent Trade Union of Education, Science and Culture (Macedonian acronym: SONK).[150] Being mainly focused on working rights and conditions, these have not so far taken any visible initiative for providing guidance on casting and working with performers with visible and invisible disabilities or performers who identify as LGBTIQ+.

Representation: The public broadcaster, MRT, operates under a clear legal mandate to "respect and promote the political, religious, social, cultural, and ethnic pluralism" of Macedonian society. However, this functions primarily as a mandate for representation of selected groups only. The legal text is specific about operational mechanisms and structures for non-majority ethnic groups but contains no explicit, quantified, or comprehensive programmatic targets for other marginalised groups, such as people with disabilities, those on low incomes, the LGBTQ+ community, or children and older people. In consequence, there are no data about representation of these groups on MRT, where their representation is very patchy, primarily crisis-driven or, in the case of people with disabilities on entertainment shows, practically non-existent.

While women are highly visible as news presenters and media workers, their presence as central actors, experts, and decision makers within serious political and economic news segments remains significantly lower than that of men. The 2026 Media Pluralism Monitor report of the Centre for Media Pluralism and Media Freedom states that women are proportionately represented in most broadcast programming other than news and current affairs. However, a joint media workforce census by the RESIS Institute and SSNM shows that, despite clear feminisation of newsrooms floors, there remains a very resistant "glass ceiling".[151] In the private national TV sector, only 17.7 per cent of elite managerial or ownership positions are held by women, and top commercial networks feature zero women in ultimate executive command. Data from the Ednakva women's media network, operating informally within the SSNM,[152] reveals that female journalists face deep socio-economic precariousness, earning below the national average while being disproportionately targeted by online sexism and systemic

147. https://avmu.mk/wp-content/uploads/2026/07/Структура-на-вработените-во-аудио-и-аудиовизуелната-медиумска-индустрија-во-2025-година.pdf
148. https://resis.mk/images/abut-us/PDF/rabotnite-uslovi-vo-mediumskiot-sektor.pdf
149. https://skrm.mk/
150. https://sonk.org.mk/en/
151. https://resis.mk/images/abut-us/PDF/rabotnite-uslovi-vo-mediumskiot-sektor.pdf
152. https://ssnm.org.mk/ednakva

marginalisation from high-profile political and economic beats. This structural lack of editorial authority partly accounts for a low percentage of female expert sources in daily newscasts. Women's low visibility during elections is also affected by the high proportion of men among candidates. AVMU monitoring of local election coverage in 2025 found that women accounted for 13 per cent of appearances by primary subjects compared with 87 per cent for men.[153]

National commercial broadcasters in North Macedonia operate on highly restricted budgets for original domestic fiction and entertainment. The domestic market is dominated by imported high-volume syndicated content, consisting primarily of Turkish and Latin American serialised drama. Consequently, original domestic entertainment content that fairly represents local vulnerable populations, geographical diversity, or minor demographics is almost entirely non-existent on commercial networks.

Consultation mechanisms: The decision-making body of the national regulator, the AVMU Council, operates under strict statutory rules laid out in the LAAVMS. Legally, the composition must reflect equitable representation of ethnic communities, and there is a visible gender balance among the members of the Agency's Council. However, there are no systematic or formalised statutory requirements to include representatives from other diverse socio-economic or marginalised groups, such as the disability sector or young media consumer advocacy panels, within its core consultative frameworks.

The governing body of the telecommunications regulator, the AEC Commission, is appointed directly by Parliament based on general administrative and professional criteria set by the Law on Electronic Communications (Article 16). The selection processes prioritise technocratic engineering and legal profiles. Apart from general alignment with the state principles of equitable ethnic representation, there is no transparency about who is included or why, regarding broader societal diversity metrics, and the agency lacks active external consultative committees representing vulnerable consumer demographics.

AVMU spearheads and coordinates the National Media Literacy Network and organises workshops, school visits, and promotional events targeting youth during its annual Media Literacy Days, in connection with which it publishes strategic research on children's media usage habits every 3-5 years. These research projects are often carried out in coordination with civil society organisations like MIM, IKS or international bodies such as UNICEF. They are not repeated more frequently due to budget and staffing limitations. The body lacks any formal mechanism to directly consult children or youth panels when drafting binding media regulations or licensing policies that affect them.

Exposing discrimination at work: The trade union (SSNM) and the professional association (AJM) routinely invite members to report experiences of labour exploitation, structural bias, and safety threats. SSNM in particular conducts systematic annual internal surveys to map workplace discrimination, pay inequality, and gender-based vulnerabilities. Through the Ednakva network established by the SSNM, female professionals have access to structural spaces to document internal sexism and report safety violations directly to union legal representatives.[154]

SKRM and SONK, acting on behalf of professional actors, stage performers, and institutional cultural workers, maintain active channels, legal advisors, and internal feedback systems that invite their members to share and report experiences of labour violations, unsafe working environments, and workplace discrimination within national theatres and cultural centres. SKRM in particular has a strong track record of publicly addressing institutional mobbing, unequal treatment, and political nepotism. These reporting mechanisms function on a grievance-driven basis rather than through regular proactive diversity forums.

153. https://avmu.mk/2026/09/21/родот-во-медиумите-за-локалните-избор/
154. https://ssnm.org.mk/ednakva

Handling complaints: The Commission for Prevention and Protection against Discrimination (KSZD) actively and systematically invites formal complaints from citizens, civil society organisations, and groups regarding any form of discriminatory activity, including traditional journalism, online portals, and advertising formats. KSZD features an open, accessible online platform where individuals can file a complaint and submit evidence of discrimination or harassment based on categories stipulated in the Law. The body is legally bound to process each validated petition.[155]

AVMU maintains a fully transparent and functional public complaints system accessible on its official website.[156] Any citizen or legal entity can file an official complaint regarding discriminatory representation, gender stereotyping, or hate speech broadcast on licensed television or radio channels. The regulator is legally required to conduct administrative monitoring based on the petition and formally publish its findings and subsequent warning measures online, making the workflow open to public oversight.

MRT does not operate a direct, separate or easily accessible standalone public desk or digital platform specifically designed for citizens to log and track complaints regarding discriminatory reporting. While the public can technically address grievances to the MRT Programme Council, this mechanism is highly bureaucratic, lacks visibility, and offers no transparent online tracking of how complaints are processed or resolved, as highlighted by RESIS Institute monitoring reports. The MRT website gives an email contact on a section entitled "Ethics Commission"[157] but no directions on how to file a complaint, no description of the mandate or any information about the composition of this commission.

The Council for Media Ethics (SEMM) operates a highly efficient, robust, and transparent self-regulatory complaints mechanism. Through an easy-to-use online reporting form, citizens and organisations can challenge unethical or discriminatory reporting in print and online media.[158] All cases are processed by an independent Complaints Commission, and the final decisions, which determine whether the Code of Journalists has been breached, are systematically published on SEMM's portal and widely distributed to the public, setting professional precedents for the industry.

The Association of Journalists of Macedonia operates the Council of Honour, a commission that handles complaints for breaches of the Code of Journalists that can be directed to this association via email.[159]

155. https://kszd.mk/пријави-дискриминација/
156. https://avmu.mk/gragjani/
157. https://mrt.com.mk/node/54419
158. https://complaints.semm.mk/podnesi-zalba/
159. https://znm.org.mk/sovet-na-chest/



SERBIA

Larisa Ranković

Regulatory powers: Serbia's 2014 Law on Public Information and Media and its 2014 Law on Electronic Media both require the country's Regulatory Authority for Electronic Media (REM) to apply regulatory actions and issue penalties against TV and radio stations and media service providers that broadcast or publish content inciting discrimination, hatred, or violence against individuals or groups based on protected characteristics such as race, religion, nationality, gender, or sexual orientation. Several provisions authorise the authority to impose administrative sanctions on non-compliant broadcasters. These range from reprimand to warning, temporary suspension, and ultimate revocation of licence and broadcasting rights.

REM is empowered to take legal action against media providers or responsible individuals. However, even though its legal powers are clearly defined, it has come in for repeated criticism for failing to apply them adequately or fairly. Criticism has come from domestic bodies such as NUNS, representing journalists[160], international human rights defenders such as the UK-based freedom of expression NGO, Article 19[161], and the European Commission in its progress reports for Serbia as a country seeking accession.[162] The failures include taking effective action against television outlets or tabloids that incite hatred, promote violence, or breach ethical standards.[163] There are many cases where, instead of revoking licences or enforcing strict sanctions, REM has shown institutional neglect and political bias, routinely ignoring or dismissing complaints regarding hate speech and targeted online or broadcast harassment.

REM occasionally issues declarative warnings to, or imposes temporary advertising bans on, commercial broadcasters (such as TV Pink or TV Happy) for explicit content, reality show violence, or advertising violations. However, despite thousands of reported violations involving hate speech, violent reality shows, and smear campaigns, REM has never revoked a national broadcasting licence for incitement to hatred or violence. In fact, in 2022, REM renewed national coverage licences for the very channels most frequently reported for these violations.

Regulation of online content: In Serbia, social media platforms operate without dedicated domestic regulation.[164] This leaves global tech platforms free from systemic oversight, transparency requirements, or local moderation standards. While general criminal laws prohibit online hate speech and threats, enforcement targets individual users rather than platforms. This environment heavily disadvantages independent media, which rely on social networks to bypass state-controlled traditional media. News outlets face arbitrary algorithmic shifts, monetisation cuts, and automated content removals caused by moderation systems that lack local language context. Meanwhile, the REM exercises no effective platform oversight. Domestic authorities selectively prosecute critical voices and online activists while ignoring coordinated political harassment and disinformation campaigns, resulting in a weak system that fails to hold platforms accountable or protect online freedom of expression.

The regulatory vacuum affecting social media platforms extends to protecting children from harmful content. REM lacks the legal mandate and enforcement powers to impose mandatory child-protection requirements on social media companies and online platforms. Its regulatory jurisdiction is limited to traditional radio and television broadcasters, along with registered

160. https://en.nuns.rs/media/2024/07/Shadow-Report_-Rule-of-Law-and-Media-Freedom-in-Serbia-1.pdf
161. https://www.article19.org/resources/serbia-media-regulator-elections-make-a-mockery-of-eu-required-reforms/
162. https://commission.europa.eu/document/download/b0b87aac-b88d-405b-bdc5-4e32f0765926_en?filename=Country+report+-+Serbia+-+EN.pdf
163. https://fom.coe.int/en/alerte/detail/107644427;globalSearch=false
164. https://seenpm.org/wp-content/uploads/2026/05/Integral-Study_Governance-of-Social-Media-Platforms-and-Regulation-of-Online-Media_ENG_2026.pdf

on-demand media service providers operating within the national framework. Measures such as mandatory age verification, algorithmic content moderation, search filtering, and standardised complaint handling for social networks fall outside REM's legal authority. As highlighted by a regional study on social media governance published by the South East European Network for Professionalization of Media, social media platforms in Serbia operate in a statutory vacuum where domestic regulatory bodies cannot legally compel global tech intermediaries to enforce platform-level safety features for minors.[165]

The National Contact Centre for Child Safety on the Internet,[166] under the Ministry of Information and Telecommunications, serves as Serbia's helpline for reporting online abuse involving minors. However, its mandate is advisory and educational and it lacks any regulatory authority over tech platforms. The Centre guides users on digital safety and forwards severe cases, such as cyberbullying, exploitation, or illegal material, to the police, the High-Tech Crime Prosecution Office, or social services for further action.

Children's programming: The "Rulebook on the Requirements and Criteria for Granting a Licence for the Provision of Media Services," which REM adopted on 8 May 2024, replaced the rulebook from 2016 which contained obligations regarding programming for children. The 2016 rulebook made obtaining a national frequency conditional on ensuring that 20 per cent of total annual broadcasts counted as quality programming, consisting – jointly or individually – of scientific-educational, cultural-artistic, documentary, or children's content, defined as content for minors. This quantitative threshold functioned as a kind of quota. In the new 2024 rulebook this provision was omitted and a more general criterion of "diversity" of programming applied instead.

When media associations and NGOs formally challenged the new rulebook that eliminated the quota, REM rejected the complaint, arguing that the Law on Electronic Media's general requirement for "diverse media content" takes precedence and that its own rulebook cannot mandate more than two programme types. Broader legal provisions in Serbia's media law do still reference proportions of children's programming as one criterion regulators can weigh, but in practice REM no longer enforces a specific children's-content quota as a licensing condition.[167] Locally made content for children is not mentioned in the regulations.

Self-regulation: The main self-regulatory body for print and online media in Serbia is the Press Council, Savet za štampu.[168] Membership in the Press Council and the full benefit of its jurisdiction are conditional on respecting the Serbian Journalists' Code of Ethics. The Code contains strict anti-discrimination provisions. Chapter V of the Code explicitly forbids journalists and media outlets from publishing content that discriminates against individuals or groups. It says at its beginning: "Journalists must not discriminate on the basis of, among other things, race, sex, gender, age, personal characteristics, sexual orientation, language, religion, political or other opinion, national or social origin."

Under the Press Council Statutes, participating media outlets and members of founding media associations must uphold these ethical standards, and failure to comply with the Code or accept the Council's rulings on discriminatory reporting can result in public reprimands, formal ethical violations, and loss of standing within the self-regulatory framework. However, the Code is often breached with impunity. Records of the Press Council's Complaints Commission shows that media discrimination in Serbia most commonly manifests as sensationalist coverage of minorities (for example identifying Roma in crime reports),

165. https://seenpm.org/wp-content/uploads/2026/05/Serbia_Online-Governance-and-Regulation_Annex_ENG_2026.pdf
166. https://pametnoibezbedno.gov.rs/
167. https://balkaninsight.com/2024/07/04/under-new-rules-serbia-gives-up-on-quality-tv-programmes-for-children/bi/
168. https://savetzastampu.rs/

homophobia and transphobia targeting the LGBT+ community, misogyny and sexism in tabloids, and the use of improper terminology that frames persons with disabilities as societal burdens or objects of pity.

The Serbian Journalists' Code of Ethics[169] explicitly prohibits discrimination based on race, gender, age, sexual orientation, religion, and national origin, requiring journalists to use anti-discriminatory language, include diverse perspectives, and disclose personal identity details only when essential to the context. Additionally, it mandates the protection of human dignity and vulnerable groups by placing strict rules on interviewing minors, respecting victims and their families, limiting coverage of non-public funerals and suicides to prevent copycat acts, and refraining from exploiting emotions, causing reputational harm, or stoking unfounded fear.

National human rights institution: The national human rights institution in Serbia, the Commissioner for the Protection of Equality (*Poverenik za zaštitu ravnopravnosti*),[170] is a publicly funded independent agency with explicit statutory powers to investigate discriminatory practices and bring cases to court. In line with Article 33 [item 4] of the Law on Prohibition of Discrimination,[171] the Commissioner for Protection of Equality is authorised to submit misdemeanour notices on account of violations of rights guaranteed by the antidiscrimination regulations.

Article 13 lists the most serious forms of discrimination. These include inciting hatred or inequality based on nationality, race, religion, language, political views, sex, gender identity, sexual orientation, disability, or age. They also include discrimination by public authorities with discrimination spread through public media singled out as an aggravating form. Other forms named are slavery, human trafficking, segregation, apartheid, genocide, and ethnic cleansing; discrimination based on multiple grounds at once; discrimination that is repeated or ongoing; and discrimination that causes serious harm, especially when a crime is committed out of hatred toward the victim because of a personal trait. In its report for 2025 the Commissioner stated that, when it comes to the media, as well as social networks, "an increase has been observed in the intensity and frequency of discriminatory and offensive posts, including hate speech, primarily in the context of settling scores with political opponents."[172]

The Commissioner for Protection of Equality issues statements that warn against cases of hate speech and discrimination. Examples of statements concerning antisemitism, Islamophobia and prejudice against members of national minorities include the following:

In January 2023, Commissioner for Protection of Equality Brankica Janković condemned antisemitic graffiti defacing the Sephardic Jewish Cemetery in Belgrade and noted that International Holocaust Remembrance Day, which marks the great suffering of a people, had been observed just a few days earlier.

In May 2025, Commissioner for Protection of Equality Milan Antonijević responded to a claim by Dragan Vučićević, editor of the tabloid *Informer*, that trains didn't run on Saturday — the day of the student protest at Slavija — because "Roma blockaders" had stolen copper cables. Antonijević stated that the Law on the Prohibition of Discrimination bans expressing ideas, information, and opinions that incite prejudice and intolerance toward members of national minorities.

In October 2025, Commissioner for Protection of Equality Brankica Janković warned that the practice of *Informer* and Pink TV in calling students who walked from Novi Pazar to Novi Sad as part of student protests "Islamic fanatics," "instructed extremists," "veiled," or "Hamas

169. https://savetzastampu.rs/wp-content/uploads/2024/12/KODEKS-novinara-i-novinarki-2025-korekcija.pdf
170. https://ravnopravnost.gov.rs/
171. https://ravnopravnost.gov.rs/wp-content/uploads/2021/06/Zakon-o-zabrani-diskriminacije_-22_2009-3-52_2021-4.p
172. https://ravnopravnost.gov.rs/wp-content/uploads/2026/03/PZR-RGI-2025.pdf

members" was illegal hate speech that creates fear and hostility toward Muslims that could incite discrimination and violence. She stressed that such conduct violated the Constitution, the Law on the Prohibition of Discrimination, the Law on Public Information and Media and international treaties that Serbia has ratified.

Access: Serbia's telecoms regulator, the Regulatory Agency for Electronic Communications and Postal Services (RATEL), oversees a universal service guarantee that is defined in law.[173] The Law on Electronic Communications requires appropriate broadband access to the internet and access to voice communication service at reasonable prices, at a fixed location, provided as a part of universal service, alongside free emergency calls and special measures for people with disabilities. In practice, application comes with limitations. RATEL's own reporting notes that providers have not built the necessary infrastructure because it would have limited economic viability in areas with fewer and less affluent users. Freedom House's *Freedom of the Net* report for 2025 showed infrastructural, financial and government technical and legal controls limiting internet access in the country.[174]

While total mobile coverage is nearly universal, remote, mountainous, and some rural areas still face infrastructure deficits. To bridge this gap, instead of relying solely on RATEL's universal service framework, the Serbian government also has a joint initiative with the EU and European Bank for Reconstruction and Development (EBRD) called the Broadband Telecommunications Infrastructure Construction Project for Rural Areas.[175]

Accessibility for the visually and hearing impaired is formally required by the regulator, REM, through a dedicated bylaw.[176] The "Rulebook on the Accessibility of Programme Content to Persons with Hearing or Visual Impairments" sets out broadcasters' obligations to provide Serbian sign language, open and closed captions, and audio description. In practice, however, enforcement is weak and accessibility of audiovisual content in Serbia remains limited and uneven across media sectors. In 2021 RTS1 subtitled just 3 per cent of its programming via hidden teletext, RTS2 0.5 per cent, and the provincial broadcaster RTV1 used sign language for 1.5 per cent of output. Commercial broadcasters largely skip these rule book accessibility adaptations, citing a Law on Electronic Media exemption for those lacking technical or financial capacity. The public broadcaster complies only marginally and sign-language interpreters mostly appear during election campaigns before disappearing again. In sum, the legal requirement exists, but real accessibility remains limited.

Community media and minority languages: Article 84 of the Law on Electronic Media governs audiovisual media services provided by the civil sector. These services exist to serve the specific interests of particular social groups such as national minorities, youth, the elderly, and persons with disabilities, as well as citizens' organisations, and must operate on a not-for-profit basis. Providers of such services can be associations, foundations, endowments, higher education institutions, churches, or religious communities, and the content they produce must relate directly to their field of activity. These services may only be provided within a local or regional coverage area, and they are subject, by analogy, to the same public-interest obligations that apply to public service media providers. Licenses for civil-sector media services are issued free of charge, and funding may come from public co-financing schemes for media projects, as well as from donations, citizen contributions, sponsorships, and other revenue sources permitted under separate legislation.

173. https://www.ratel.rs/en/univerzalni-servis
174. https://freedomhouse.org/country/serbia/freedom-net/2025#A
175. https://europa.rs/connecting-rural-communities-for-digital-future/?lang=en#:~:text=Image
176. https://www.rem.rs/uploads/files/Pravilnici/Pravilnik%20o%20dostupnosti%20programskih%20sadrzaja%20osobama%20ostecenog%20sluha%20odnosno%20vida%20-%20e.pdf

In practice, sustainability of non-for-profit media is difficult to attain. They rely on donor support, project-based funding, some audience support, and often volunteer labour. Serbia's Strategy for Development of the Media System 2020-2025 envisioned legal recognition for all non-profit civil society media, relief in the form of reduced fees and preferential tariffs, regulatory changes to facilitate donations and microfinancing, and a study on establishing a dedicated fund for the sector.[177] However, despite some legislative progress, the biggest problems remain unresolved: project co-financing continues to draw serious criticism over non-transparency, stable funding sources were never established, and the promised fund was never created.

In Serbia, the legal framework requires public service media to preserve and express national minority cultural identity through minority-language programming under the Law on Public Media Services. This is implemented through dedicated original production in minority languages, not through translation of majority-language content into minority languages. A significant number of national minorities have no media reporting in their language at all, while others have a long tradition of information in their mother tongue and a large number of diverse outlets.[178]

Workforce recruitment: The only diversity obligations placed on Serbia's two state broadcasters, Radio Television of Serbia (RTS) and Radio Television of Vojvodina (RTV), by the Law on Public Media Services relate to content, not recruitment of newsroom or other staff. The Law[179] requires RTS and RTV to serve diverse groups through content in minority languages, gender balance in governing bodies – the Management Board and Programme Council – and programming that fosters interethnic and religious tolerance. Meeting these requirements implies recruitment of staff who are competent in minority languages.

RTV, the regional public broadcaster in the Serbian province of Vojvodina, comprises two channels (Channel 1 and Channel 2) and an online outlet. It is considered the only broadcaster in Serbia that brings stories in minority languages and reports on events important for the preservation of minority culture and language, as well as ethnic diversity in Vojvodina. Their minority programme is devoid of sensationalist content. By breaking language barriers, it tries to affirm multiculturalism as a model of living together in Vojvodina.[180] According to a case study on RTV in the OSCE 2026 report, RTV broadcasts TV content in 11 languages and radio content in 16, with its second TV channel and second/third radio channels dedicated to minority-language programming.[181] The OSCE report flags that three of RTV's seven editor-in-chief posts are for minority-language programming, all seven currently stuck in "acting" status for over a year — a particular risk given 2026's national minority council elections. RTS, the national broadcaster, shows far weaker evidence and lacks minority-language desks altogether.

There are no available data for other segments of the population being employed as a precondition for the programming diversity. Major commercial media outlets do not publish workforce diversity metrics, nor do they implement structured equal-opportunity hiring frameworks, leaving recruitment unmonitored. A broad diversity of staff across ethnicity, geography, disability, and sexual orientation is effectively non-existent.

Representation: The Law on Public Media Services contains provisions that are meant to support diversity. It states that public media services must respect and encourage pluralism of political, religious, and other ideas, keeping the public informed about them without serving

177. https://anem.org.rs/en/strane/strategija-razvoja-medijskog-sistema-srbije-2020-2025-i-njena-implementacija
178. https://serbia.osce.org/sites/default/files/documents/official_documents/2026/03/Informisanje%20na%20jezicima%20nacionalnih%20manjina%20i%20studija%20slu%C4%8Daja-Mediji%20na%20ma%C4%91arskom%20jeziku.pdf
179. https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2014/83/6/reg
180. https://www.media-diversity.org/national-minorities-and-balkan-broadcasters-part-1-serbia-and-croatia/
181. https://serbia.osce.org/sites/default/files/documents/official_documents/2026/03/Studija%20slu%C4%8Daja%20javnog%20medijskog%20servisa%20Radio-televizije%20Vojvodine.pdf

the interests of any particular political party, religious community, or other single political, economic, or religious viewpoint. It further requires that public media meet the informational needs of all parts of society without discrimination, paying particular attention to socially sensitive groups such as children, youth, the elderly, minority groups, persons with disabilities, and those who are vulnerable socially or for reasons of health. The law also obliges public media to address citizens' need for programming that preserves and expresses the cultural identity of both the Serbian majority and national minorities, including ensuring that minorities can follow certain programming in their own language and alphabet. While RTS still fails to meet OSCE recommendations on providing sufficient content for all legally recognised national minorities, RTV continues to stand out as an example of better practice in this regard.[182] Outside state media, only a few smaller outlets, such as the Centre for Investigative Journalism of Serbia (CINS) and the community media Storyteller, have published relatively comprehensive editorial guidelines that include diversity principles.

Serbia's public service media have no gender equality policies. Their normative documents do not acknowledge structural barriers, nor do they include mechanisms for monitoring or promoting gender-equal working conditions. Data for women's representation in Serbian media were collected in a 2021 study, the country's first on the topic, which emulated the Global Media Monitoring Project (GMMP) called "Who Makes the News?" that has been taking five-yearly snapshots of the proportion of women in the news and reporting the news since 1995. The study, entitled *Gender Structure of Director and Editorial Positions in News Media* and produced by the Faculty of Political Science at the University of Belgrade with support from the OSCE and Norwegian embassy, examined 22 media outlets and 2,000 employees.[183] It found that women make up 60 per cent of Serbian journalists, occupying 58 per cent of lower-level editorial roles but only 20 per cent of top positions, with women largely excluded from editor-in-chief roles at major outlets. At director level, women hold about 36 per cent of positions.

Data on representation of women is also published by the *Media Pluralism Monitor* for 2026.[184] Out of 18 board members across RTS and RTV, only 3 are women. Meanwhile private television stations continue to display a pronounced gender imbalance, with men dominating management and leadership positions: women hold only 16.7 per cent of top executive positions across the two largest TV companies. Although ratios are more balanced at the local level, local press reports suggest that some women respond to the pressures in editorial offices by establishing their own media organisations, securing autonomy and greater editorial freedom. When it comes to women as news subjects and sources, private broadcasters featured women as news subjects up to five times less often than men. They are significantly underrepresented as news subjects and sources across pro-government, independent, public, and commercial media. In legacy media, they appear as subjects in only 24 per cent of stories and are presented as experts or commentators in only 12 per cent. In digital media the proportion of women appearing as subjects rises to 36 per cent.

Overall, women's visibility varies by topic. They are least present in politics (17 per cent) and economics (21 per cent), somewhat more in social/legal issues (33 per cent), highly represented in science and health (67 per cent), and most visible in celebrity and culture coverage (79 per cent). They are often invited to speak about human rights, femicide, early childbirth, or cultural traditions, typically framed through personal experience rather than through professional authority. In reports of crime and violence women appear predominantly as victims (64 per cent), with gender-based violence rarely treated as a systemic issue. Misogynistic framing persists,

182. https://cadmus.eui.eu/server/api/core/bitstreams/823d434b-1666-4a48-b3b4-05e773dba5b7/content
183. https://cdn.osce.org/sites/default/files/f/documents/0/c/491866.pdf
184. https://cadmus.eui.eu/server/api/core/bitstreams/823d434b-1666-4a48-b3b4-05e773dba5b7/content

and reporting on femicide remains sensationalistic and ethically inadequate. Monitoring by the Reporting Diversity Network (RDN)[185] cites specific instances of discriminatory treatment on commercial broadcasters. On TV Prva the Minister of Family Welfare publicly questioned women's testimonies of obstetric violence without being challenged. On TV Happy an MP made sexist remarks about an opposition MP. Vojislav Šešelj, an ultranationalist politician and frequent commentator on Informer TV insulted and threatened a female student on the channel live on air. *Kurir*, a digital media outlet and newspaper ran a front page blaming women for the non-consensual sharing of their images.

For representation of minority ethnic groups, RDN found no evidence of routinely fair treatment on the commercial outlets, *Informer*, *Alo!*, and *Novosti*. Instead, these outlets actively spread hostile narratives against Bosniaks (around Srebrenica genocide commemorations), Croats (for example publishing the names and passports of students of Croatian origin as "proof" of foreign influence) and Albanians (Informer using the slur "Šiptari" for Albanians during football matches). TV Prva, TV Pink, and TV Informer aired documentaries in 2025 that systematically vilified student protesters using ethnic and nationalist labels.

Content about people with disabilities was found to be rare across the four most-visited commercial portals — Blic, Kurir, Telegraf, and Alo — according to a Novi Sad School of Journalism study conducted in 2021.[186] The study found that reporting often failed to meet professional standards for treating this group. Similar lack of coverage was found by an OSCE-backed study published in February 2026.[187] Despite a decade of legal reforms and project co-funding, it showed reporting framed around two extremes — pity or creating heroes – rather than treating disability as a social and civic issue.

RTS and RTV are legally required to maintain local and regional correspondents, and their numbers have remained stable. Yet their news programming does not meet the information needs of local communities. Issues most relevant to citizens, such as political accountability, environmental risks, and key social developments, were largely absent from their agenda. Moreover, research documented dissemination of inaccurate, incomplete, or manipulative information. This was particularly evident in the coverage of the student and civic protests of 2024–2025. Public broadcasters mostly ignored the protests, downplayed their significance, or openly condemned them. RTS has a network of 26 correspondent bureaus[188] across the country. Capacity has been reduced in some of them. The Niš bureau, for example, had 18 employees in 2019, compared with 100 at one time.[189] Monitoring of RTV found that it neglects its own region, with its main news programmes originating from Belgrade rather than Vojvodina itself, with towns in the province getting airtime mainly during official visits or election campaigns.[190] Overall programming of outlying regions remained dominated by collage-style shows that compile soft-news content such as lifestyle stories, folklore, or basic service information, while neglecting substantive local reporting.

Other diverse groups in society, such as faith groups, fare poorly in Serbian media. Coverage of LGBTIQ+ communities appears only around specific cultural events and is most often hostile in tone. Semiotic/content analysis of Serbian television and print found that visual representation of the poor is highly simplified and stereotyped, disconnected from the broader social context

185. https://www.reportingdiversity.org/wp-content/uploads/2024/04/Monitoring-Report-on-Hate-Speech-in-Serbia.pdf
186. https://novinarska-skola.org.rs/medijski-sadrzaji-slabo-pristupacni-osobama-sa-invaliditetom-a-izvestavanje-odlikuje-niz-negativnih-praksi/
187. https://serbia.osce.org/sites/default/files/documents/official_documents/2026/03/Prilog_za_evaluaciju_Strategije razvoja sistema javnog informisanja u Republici Srbiji 2020–2025 - Cilj 4.pdf
188. https://www.rts.rs/lat/tv/rts2/4589202/trezor.html
189. https://www.juznevesti.com/drustvo/trideseti-rodjendan-niskog-dopisnistva-rts/
190. https://www.slavkocuruvijafondacija.rs/en/vojvodina-public-service-tv-neglects-topics-from-vojvodina-region/

of poverty, reduced to disjointed media fragments that fail to convey the seriousness of the issue.[191] Older people are rarely featured. If they appear in television advertising they tend to be stereotyped as weak or old-fashioned.[192] Children are unlikely to see themselves on screen as dedicated children's programming has collapsed on both state media and private broadcasters. TV Pink and TV Happy featured no children's programmes at all in 2022. TV Prva broadcast less than three minutes of children's programming in the first three months of 2022 and while B92 was way ahead, with 13 per cent of its programming aimed at children, this mostly consisted of cartoon reruns.

Consultation mechanisms: REM's nine-member Council is nominally structured for diverse input. It is supposed to represent civil society organisations, national minority councils, churches and religious communities, university and academic associations, media and journalist associations, as well as organisations focused on child and youth protection. Additionally, both women and men are members of REM's Council. However, there are many problems with REM's functioning in practice, seen in excessive state interference in the selection of Council members with the aim of controlling its work.

RATEL's governance as an administrative and technical body is mandated by the Law on Electronic Communications. Its Council[193] and management[194] are proposed directly by the Government and appointed by the National Assembly based on technical, legal, or economic expertise. There are no statutory quotas, designated consultative committees, or formal representation mechanisms for women, marginal groups, persons with disabilities, or civil society.

REM is legally required to monitor whether television and radio stations comply with minor protection regulations (such as labelling inappropriate content with 12+, 16+, and 18+ age ratings, restricting the broadcast hours of reality shows, etc.). It publishes annual statistical reports on the amount of time TV broadcasters allocate to "satisfying the information needs of all segments of society without discrimination, paying special attention to socially vulnerable groups such as children, youth and the elderly, minority groups, persons with disabilities, the socially and healthwise vulnerable, and others". The latest report on their website is for 2024.[195] Civil society organisations and media, such as Friends of Children of Serbia and the Network of Organizations for Children of Serbia (MODS), regularly submit complaints to REM regarding the exploitation of children in commercial and political programming. Throughout 2026, the public has particularly raised concerns over a regulatory vacuum during periods when the REM Council was not fully staffed or operational, resulting in delayed responses to severe violations in children's broadcasting.

Exposing discrimination at work: The Journalists' Association of Serbia (*Udruženje novinara Srbije* – UNS), which is the largest media association in the country, actively documents and responds to workplace discrimination, selective access, and administrative bias directed at media professionals. For example, it has highlighted cases where local authorities and national minority councils systematically excluded independent outlets—such as Slobodna reč and Családi Kör—from official press conferences.[196] The Independent Journalists' Association of Serbia (NUNS) also actively addresses these issues, partnering with domestic media organisations and international networks like SafeJournalists and the Media Freedom Rapid Response (MFRR) to protect journalists' rights and combat discrimination.

191. https://www.researchgate.net/publication/370344939_Framing_of_poverty_in_TV_reporting_in_Serbia
192. https://www.journalofcommunication.ro/index.php/journalofcommunication/article/download/811/408
193. blic.rs/vesti/politika/skupstina-potvrdila-vise-odluka-izabrani-predsednik-i-clanovi-saveta-ratel-a/5zh1gnn
194. https://www.ratel.rs/en/organizational-structure
195. https://www.rem.rs/uploads/files/izvestaji%20o%20nadzoru/Izvestaj%20o%20ispunjavanju%20zakonskih%20i%20programskih%20obaveza%20Radio-televizije%20Srbije%20za%202024.%20godinu.pdf
196. https://www.uns.org.rs/sta-radimo.html

Handling complaints: In Serbia, the national human rights institution, specifically the Commissioner for Protection of Equality[197] is authorised under the Law on the Prohibition of Discrimination to receive and review complaints (*pritužbe*) from individuals, organisations, or groups regarding discriminatory content, hate speech, and discriminatory practices in media activity and commercial advertising. While media regulators like the Regulatory Authority for Electronic Media (REM) handle general broadcasting standards, the Commissioner specifically evaluates whether published or broadcast material perpetuates discrimination or stereotyping against protected groups and issues formal opinions, recommendations, or public warnings to non-compliant media providers. Although REM is legally mandated to ensure broadcasters' programming does not incite discrimination, hatred, or violence based on political affiliation, race, religion, nationality, ethnicity, sex, or sexual orientation, its record of handling complaints falls well short of being robust or transparent. The Centre for Media Pluralism and Media Freedom finds that REM fails to fulfill its functions independently and without discrimination and is not independent of the state administration. The appointment process for the REM governing Council has repeatedly collapsed amid documented procedural irregularities favouring government-aligned candidates, leaving Serbia without a functioning REM Council for extended periods and undermining any confidence in the impartiality of decisions it does issue.

RTS meanwhile only recently gained a formal complaints mechanism under a June 2025 amendment to the Law on Public Media Services, which introduced a Commissioner for the Protection of the Rights of Listeners, Viewers and Readers (*Poverenik za zaštitu prava slušalaca, gledalaca i čitalaca*), who reviews audience complaints and proposals. The Commissioner is required to log complaints, inform the editors-in-chief, respond in writing to complainants, and report quarterly to the Programme Council, Director General, and Management Board. However, this arrangement is still new, relatively untested and exists for complaints in general, not only those relating to discriminatory reporting.

Serbia's Press Council (*Savet za štampu*) is the main self-regulatory body for print and digital news. It has a formal complaints process open to individuals and institutions and a Complaints Commission that issues public rulings, including on discriminatory reporting. However, its robustness in practice is limited: the Council has no sanctioning power beyond public warnings. According to the latest available report (January 2026), nine daily newspapers violated the Code of Journalists and Journalists of Serbia 7,346 times across 4,506 articles in the second half of 2025.[198] This was an increase compared to 2024. Government officials have publicly attacked the Council's legitimacy, calling its decisions "selective". That is to say: while the mechanism exists and is procedurally transparent, weak enforcement and political pressure mean it should be assessed as only partially meeting the criteria for being robust and transparent.

197. https://ravnopravnost.gov.rs/en/
198. https://savetzastampu.rs/wp-content/uploads/2026/01/Izvestaj-FINAL-2025.-1.pdf

RECOMMENDATIONS

This report has been months in the making, but its publication happens to coincide with a memorable turning point in the political landscape of Serbia. That is the October 2026 ouster of an autocratising government by a student-led movement mobilised against corruption and seeking reinstatement of the rule of law. It is notable that, just as the Serbian election result can be traced to protests at the collapse of a railway station roof that killed 16 people in November 2024 and symbolised everything protestors considered to be wrong with the regime, Albania is also witnessing protests sparked by allegations of corruption. They began in May 2026 against a tourism project linked to the family of US President Donald Trump in a protected part of the coast that is home to flamingos and widened in October to reflect student anger at the state of the economy and calls for the prime minister, in power since 2013, to go.

While protests in Serbia and Albania signal rejection of entrenched structures, the October 2026 elections in Bosnia and Herzegovina also indicate, through the low turnout, the level of public disenchantment with the separatist discourse that helped to return ethnonationalist leaders to power. Support for war criminals of the 1990s continues to the present day, as seen on the death in August 2026 of Ratko Mladić, responsible for genocide in Bosnia. And the conflicts of the 1990s continue to stoke anger and division, as happened with the prosecution in The Hague of Kosovo's former president, Hashim Thaçi.

A key antidote to divisive rhetoric lies in accurate, fair and easily accessible media reporting that ensures all communities and sections of society are equally and respectfully heard. Where laws and regulatory frameworks already exist to make this happen, now is the time, when large parts of society crave a new deal, to have recourse to them. Where additional provision is needed, now is the time to identify gaps and rectify them. To that end, MDI and MDI WB recommend the following:

- **Find ways to maximise** public attention paid to truly inclusive media as an indivisible element in Serbia's political renewal, ensuring that new parliamentarians, who will be aware of flagrant violations of guarantees against incitement to violence or hatred, become fully informed about existing legal provisions that must be acted on in future. The national political reset affords a rare opportunity for an audit of the country's media regulations and regulatory bodies with a view to implementing best practice in regard to media inclusivity.

- **Engage culture sector unions**, film festival organisers, progressive media managers and others in dialogue about the need for a step change in local origination of socially relevant feature films, documentary films and television drama. One possible move in this direction could be promotion of diversity in film festival and national TV awards along the lines of the regional award for multimedia content on media and youth identity that the Media Diversity Institute initiated in 2024. Funding currently available for advances in journalism across the Western Balkans should be complemented with support for fictional media and various storytelling genres to counteract the current dearth of local production of audiovisual entertainment, which is particularly acute in some countries in the region.

- **Extend networking activities** with university media departments and specialist academics to encourage qualitative and quantitative studies of media portrayals of diverse and disadvantaged groups, whether by research students or professors or both. Entertainment media merit examination as much as news and current affairs. Studies conducted on representation of women and minority ethnic groups need to be complemented by examination of how different types of media cover people from rural and peripheral communities, people on low incomes, the elderly and so on.

- **Include media recognition** of the intersectional and multidimensional nature of diversity as a default agenda item in gatherings where media practitioners and media industry representatives meet with advocacy groups and researchers. Discussion around the essential talking points of gender and ethnicity can also encompass aspects of diversity that intersect with these characteristics but are often overlooked, such as age, disability and socio-economic status. It should bring in civil society advocates for the rights of people from rural and peripheral communities, and the elderly, to benefit from their data, their perspectives on the most pressing media representation issues, and ideas for improvement.

- **Liaise with national regulatory** bodies to produce a glossary of diversity-related terminology, to serve multiple purposes: a checklist for issues that come up in any agenda for media diversity and inclusiveness; an agreed set of definitions to facilitate advancing that agenda; and a reminder that the onus is on national authorities to provide a free and more open environment for media diversity, both in terms of regulations and practice.

- **Address the striking imbalance** between women's healthy numerical presence in newsrooms and media offices and their widespread absence from senior media management. Women's union groups and networks should seek funding to collectively brainstorm – perhaps with counterpart bodies in countries that have performed well on this indicator – pathways that are both effective and realistic to getting more women promoted in the industry. Evidence shows that a more equitable gender balance in senior management leads to more equitable representation of women in media content.

- **Encourage voluntary monitoring** of workforce diversity, together with related training, by bodies producing and regulating media that do not already have such monitoring systems in place, as a prelude to advocacy for making such monitoring mandatory and its results publicly available. Besides gender balance and representation of minority ethnic groups, statistics would take account of various forms of disability, socio-economic background and so on, linking these with the diversity of people at different levels of seniority.

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REFERENCES



ALBANIA

Laws, legal documents and public institution reports

- Law No. 97/2013 "On Audiovisual Media in the Republic of Albania", as amended incl. Law No. 30/2023. https://ama.gov.al/wp-content/uploads/2020/07/Law-no.-97-2013-on-the-Audiovisual-Media-in-the-Republic-of-Albania.pdf
- Law No. 10221/2010 "On Protection from Discrimination", as amended (Equinet translation). https://equineteurope.org/wp-content/uploads/2021/04/Law-on-Protection-from-Discrimination-Albania_amended-1.pdf
- Law No. 96/2017 "On the Protection of National Minorities in the Republic of Albania, https://rm.coe.int/law-on-protection-of-national-minorities-in-albania-english/1680a0c256
- Law No. 54/2024 " On Electronic Communications in the Republic of Albania," https://alprofitconsult.al/en/the-new-law-on-electronic-communications/
- Albanian Radio and Television (RTSH). (2026). Annual report 2025. https://kuvendiwebfiles.blob.core.windows.net/webfiles/20260630084320789 9Raport%20per%20veprimtarine%20e%20RTSH%2C%202025.pdf
- Albanian Radio and Television (RTSH). (2025). Statute of Albanian Radio and Television. https://rtsh.al/wp-content/uploads/2025/03/Statuti-i-RTSH.pdf
- Audiovisual Media Authority (AMA), 2023. "Regulation of the Audiovisual Media Authority", https://ama.gov.al/wp-content/uploads/2020/07/RREGULLORE-E-AUTORITETIT-TE-MEDIAVE-AUDIOVIZIVE.pdf
- Audiovisual Media Authority (AMA), 2015. "Code of Ethics of AMA Administration", https://ama.gov.al/wp-content/uploads/2020/11/Kodi-etik-i-administrates-se-AMA.pdf
- Audiovisual Media Authority (AMA), Complaints Council Bulletin No. 15 (December 2023). https://ama.gov.al/wp-content/uploads/Complaints-Bulletin-December-2023.pdf
- Audiovisual Media Authority, Broadcasting Code (Decision No. 60/2023). https://ama.gov.al/wp-content/uploads/Broadcasting-Code-of-AMA.pdf
- Audiovisual Media Authority (AMA) and Albanian Radio and Television (RTSH). (21 October 2025). Public service broadcasting contract, https://ama.gov.al/wp-content/uploads/Kontrate-e-sherbimit-te-transmetimit-publik.pdf
- Audiovisual Media Authority (AMA). Data on Audio/Audiovisual Market Developments in the Republic of Albania (January–December 2025). https://ama.gov.al/wp-content/uploads/AMA-BULETINI-PERIODIK-12-1-1.pdf
- Audiovisual Media Authority (AMA). Data on Audio/Audiovisual Market Developments in the Republic of Albania (January–December 2024). https://ama.gov.al/wp-content/uploads/AMA-BULETINI-PERIODIK-11-2.pdf
- Authority on Electronic and Postal Communications (AKEP,) Regulation under Law No. 54/2024 "On Electronic Communications" (2026). https://akep.al/wp-content/uploads/2026/04/5.-Regolation-on-General-Autorization-approved.-clean-pdf.pdf
- Authority of Electronic and Postal Communications (AKEP). (2025). Annual report 2025, https://akep.al/wp-content/uploads/2026/07/Raporti-Vjetor-2025-AKEP-final.pdf
- Commissioner for Protection from Discrimination, summary of 2024 decisions (incl. Decision No. 23/2024). https://www.kmd.al/wp-content/uploads/2025/10/Permbledhese-Vendime-KMD-2024.pdf

International and local reports

- Balkan Investigative Reporting Network (BIRN). (2023). Media Ownership Monitor Albania (MOM Albania). https://albania.mom-gmr.org/en/
- Balkan Investigative Reporting Network (BIRN) / Balkan Insight. (2025, July 22). Women journalists in Albania unprotected in face of online abuse. https://balkaninsight.com/2025/07/22/women-journalists-in-albania-unprotected-in-face-of-online-abuse/bi/
- Centre for Media Pluralism and Media Freedom. Media Pluralism Monitor. (2026). Albania country monitoring report. https://cmpf.eui.eu/country/albania-2026/
- Citizens.al. (2026, February 26). Heshtja e detyruar: Personat me aftësi të kufizuar në dëgjim mbeten jashtë informacionit publik. https://citizens.al/en/2026/02/26/heshtja-e-detyruar-personat-me-aftesi-te-kufizuar-ne-degjim-mbeten-jashte-informacionit-publik/
- Council of Europe, Advisory Committee on the Framework Convention for the Protection of National Minorities (ACFC). (2023). Fifth opinion on Albania (adopted 6 June 2023). https://rm.coe.int/5th-op-albania-en/1680acf90e
- Council of Europe Office in Tirana. (2020–2021). Alliance for Ethical Media in Albania: Activities and developments. https://www.coe.int/en/web/tirana/-/alliance-for-ethical-media-in-albania-discusses-key-results-and-a-new-approach-for-handling-copyright-issues-in-albania
- European Equality Law Network. Albania country page (including reporting on a January 2024 annulment of a KMD LGBTI+ hate-speech decision). https://www.equalitylaw.eu/country/albania
- European Institute for Gender Equality (EIGE). Gender Equality Index: Albania. https://eige.europa.eu/sites/default/files/gender_equality_index_albania.pdf
- European Institute for Gender Equality (EIGE). Women and power in the Western Balkans and Turkey (2020 data). https://eige.europa.eu/gender-statistics/dgs/data-talks/women-and-power-western-balkans-and-turkey
- European Platform of Regulatory Authorities (EPRA). (2018). Gender report. https://cdn.epra.org/attachments/files/3356/original/EPRA-Gender-Report-FINAL.pdf
- Frontiers in Communication. (2026). Media self-regulation in Albania, 2018–2025. https://www.frontiersin.org/journals/communication/articles/10.3389/fcomm.2026.1754359/full
- International Press Institute (IPI) / Media Freedom Rapid Response (MFRR). (2026, February 9). Joint statement on democratic reform of Albania's public broadcaster RTSH. https://ipi.media/albania-democratic-reform-of-public-broadcaster/
- International Telecommunication Union (ITU). (2025). Closing the rural connectivity gap in Albania. https://www.itu.int/en/ITU-D/Regional-Presence/Europe/Documents/Publications/2025/Clean_Closing%20Rural%20Connectivity%20Gap%20Policy%20Paper%20_June%202025.pdf
- Londo, I. (2025, January). The future of the media in Albania – Facts and trends. Our Media / South East European Network for Professionalization of Media (SEENPM). https://futureofmedia.seenpm.org/wp-content/uploads/2025/03/Ourmedia-Albania-EN.pdf
- Reporting Diversity Network. (2025). Mapping gendered disinformation in the Western Balkans – Albania. https://www.reportingdiversity.org/resources/mapping-gendered-disinformation-in-the-western-balkans-albania/

SCiDEV / Albanian Woman in Audiovisual. (2024). Gender-sensitive journalism skills assessment. [Full publication details not supplied].

SCiDEV / Albanian Woman in Audiovisual. (2026, August). Breaking moulds, shaping the future: From better representation to better newsrooms in Albania. https://scidevcenter.org/2026/08/10/breaking-moulds-shaping-the-future-from-better-representation-to-better-newsrooms-in-albania/

UNICEF Albania. (n.d.). One click away: Children's experience of internet use in Albania. https://www.unicef.org/albania/sites/unicef.org.albania/files/2020-01/report_oneclickaway.pdf

Worlds of Journalism Study. (n.d.). Country report: Albania. https://epub.ub.uni-muenchen.de/31745/1/Country_report_Albania.pdf

---



BOSNIA AND HERZEGOVINA

Laws and Rules

- BHRT. (2025). Statute of the Public Broadcasting Service of Bosnia and Herzegovina (BHRT). https://bhrt.ba/uploads/PDF%20dokumenti%202025/Statut%20BHRT.pdf
- Bosnia and Herzegovina Journalists Association. (n.d.). Code of Ethics of BH Journalists. https://bhnovinari.ba/bs/kodeks-asti-bh-novinara/
- Communications Regulatory Agency of Bosnia and Herzegovina. (n.d.). *Code on the Ammendment to the Code on Audiovisual Media Services*. https://docs.rak.ba/articles/2d1f484f-28cd-4ab4-8aa4-ff47831d2c04.pdf
- Constitutional Court of Bosnia and Herzegovina. (n.d.). Constitution of Bosnia and Herzegovina. https://www.ustavnisud.ba/public/down/USTAV_BOSNE_I_HERCEGOVINE_bos.pdf
- Legalist. (n.d.). Law on Communications of Bosnia and Herzegovina (unofficial consolidated text). https://legalist.ba/wp-content/uploads/2014/02/Zakon-o-komunikacijama-BiH-nesluzbeni-precisceni-tekst.pdf
- Parliamentary Assembly of Bosnia and Herzegovina. (n.d.). Law on the Public Radio-Television System of Bosnia and Herzegovina. https://www.paragraf.ba/propisi/bih/zakon-o-javnom-radio-televizijskom-sistemu-bosne-i-hercegovine.html
- Press and Online Media Council in Bosnia and Herzegovina. (n.d.). Press and Online Media Code of Bosnia and Herzegovina. https://vzs.ba/en/press-and-online-media-code-of-bih/

Websites of Institutions

- Bosnia and Herzegovina Journalists Association. *Free Media* Help line. https://bhnovinari.ba/bs/linija-za-pomoc/
- Communications Regulatory Agency of Bosnia and Herzegovina. Guidelines on the Accessibility of Programme Content for Persons with Disabilities and Developmental Difficulties. https://docs.rak.ba/articles/2bfd737c-6170-4092-86cb-179bd60abe9d.pdf
- Institution of Human Rights Ombudsman of Bosnia and Herzegovina. Official website. https://www.ombudsmen.gov.ba/
- Press and Online Media Council in Bosnia and Herzegovina. Complaint and Adjudications. https://vzs.ba/en/complaint-and-adjudications/

Reports and Media Articles

- Bosnia and Herzegovina Journalists Association. (2026, January 30). Two Years of the Helpline for Human Rights Defenders. https://bhnovinari.ba/en/2026/01/30/two-years-of-the-helpline-for-human-rights-defenders/
- Bosnjaci.net. (n.d.). *CRA Initiates Proceedings Against RTRS Following Joint Complaint by Five Victims' Associations*. https://bosnjaci.net/prilog.php?pid=86574
- Communications Regulatory Agency of Bosnia and Herzegovina. (2024). Annual Report 2024. https://docs.rak.ba/documents/508fe794-f1bc-4a72-90f7-80bcd69e2690.pdf
- Mediacentar Sarajevo. (n.d.). Women in media in Bosnia and Herzegovina. https://www.media.ba/sites/default/files/women_in_media_bih.pdf
- Media and Information Literacy in Bosnia and Herzegovina. (n.d.). List of Experts in Media and Information Literacy. https://medijskapismenost.ba/hr/lista-strucnjaka-iz-podrucja-medijske-i-informacijske-pismenosti/
- Novi Put Association. (2025). GMMP 2025 Country Report: Bosnia and Herzegovina. https://www.newroadbih.org/index.php/en/gender-media-en/gmmp/item/756-gmmp-2025-country-report-bosnia-and-herzegovina.html
- UNICEF Bosnia and Herzegovina. (n.d.). Between Screens and Influence: Who Shapes Young People's Online Experiences. https://www.unicef.org/bih/izvje%C5%A1taji/izme%C4%91u-ekrana-i-uticaja-ko-oblikuje-online-iskustva-mladih

---



KOSOVO

Laws, legal documents and public institution reports

- Administrative Instruction No. 09/2012 on Employment Records for Persons with Disabilities. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=10182
- Constitution of the Republic of Kosovo. https://www.constituteproject.org/constitution/Kosovo_2016?lang=en
- Criminal Code No. 06/L-074 of the Republic of Kosovo. https://gzk.rks-gov.net/ActDetail.aspx?ActID=18413
- Electronic and Postal Communications Regulatory Authority (ARKEP). Regulation No. 005/B/24. https://www.arkep-rks.org/desk/inc/media/509E7D00-87BA-4897-AEBB-900C559B4633.pdf
- Independent Media Commission (IMC). (2016). Code of Ethics for Media Service Providers. https://kpm-ks.org/cmsapi/content/media/5233d8dd-5822-4265-8db4-34cb1fd549fc.pdf
- Independent Media Commission (IMC). (2023). Regulation No. 2023/01 on the Protection of Children and Minors in Audiovisual Media Services. https://kpm-ks.org/cmsapi/content/media/e81a8ffe-fef7-481e-b386-14ea954dbe20.pdf
- Independent Media Commission (IMC). (2023). Regulatory Objectives for 2023. https://kpm-ks.org/cmsapi/content/media/3458a4f0-977f-45ab-af48-7d417cc4eebd.pdf

- Independent Media Commission (IMC). (2024). Regulation No. 2024/02 on the Protection of Users in the Provision of Audio and Audiovisual Media Services. https://kpm-ks.org/cmsapi/content/media/0af5ae80-b4a4-4660-808a-00816e986d0c.pdf
- Independent Media Commission (IMC). (2025). Annual Report 2024.
- Independent Media Commission (IMC). (2026). Annual Report 2025.
- Independent Media Commission (IMC). (2026). Annual Financial Report 2025.
- Kosovo Agency for Gender Equality. (2020). Kosovo Programme for Gender Equality 2020–2024. https://abgj.rks-gov.net/assets/cms/uploads/files/AGE%20Kosovo%20Program%20for%20Gender%20Equality%202020-2024.pdf
- Law No. 03/L-047 on the Protection and Promotion of the Rights of Communities and Their Members in Kosovo. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2531
- Law No. 04/L-044 on the Independent Media Commission. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2809&langid=2
- Law No. 04/L-046 on Radio Television of Kosovo. https://gzk.rks-gov.net/ActDetail.aspx?ActID=2812&langid=2
- Law No. 04/L-109 on Electronic Communications. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=2851
- Law No. 05/L-019 on the Ombudsperson. https://gzk.rks-gov.net/ActDetail.aspx?ActID=10922&langid=2
- Law No. 05/L-021 on Protection from Discrimination. https://gzk.rks-gov.net/ActDetail.aspx?ActID=10924&langid=2
- Ombudsperson Institution of Kosovo. (2023). Ex officio Report No. 146/2021: Language in Public Discourse. https://oik-rks.org/wp-content/uploads/2024/02/Raporti-EN_Digital.pdf
- Ombudsperson Institution of Kosovo. (2024). Annual Report 2024. https://oik-rks.org/wp-content/uploads/2025/03/Ombudsperson-Institution_Annual-Report-2024_compressed.pdf
- Ombudsperson Institution of Kosovo. (2025). Guide to Good Practices in Handling LGBTIQ+ Cases. https://oik-rks.org/wp-content/uploads/2025/02/131-2024Udhzues-pr-Praktika-t-Mira-Trajtimi-I-Rasteve-t-Personave-LGBTIQ-1_compressed-re.-pdfresizer.com_.pdf
- Ombudsperson Institution of Kosovo. Department on Protection from Discrimination. https://oik-rks.org/en/department-on-protection-from-discrimination-dpd/
- Ombudsperson Institution of Kosovo. Legal Framework for Receiving Complaints. https://oik-rks.org/en/department-of-admission-and-administration-of-complaints-daac/legal-framework-daac/
- Press Council of Kosovo. (2024). Statute of the Press Council of Kosovo. https://presscouncil-ks.org/?page_id=291
- Press Council of Kosovo. Press Code of Kosovo. https://www.presscouncils.eu/codes/54_xk/
- Regulation No. 03/2021 on Employment and Engagement of Artists at Kosovo Opera. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=51825
- Regulation No. 04/2021 on Resident Theatre Actors. https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=53109

International and local reports

- Association of Journalists of Kosovo (AJK). (2025). Indicators on the Level of Media Freedom and Journalists' Safety in Kosovo. https://www.agk-ks.org/site/assets/files/3933/index_kos-eng_2025.pdf
- Association of Journalists of Kosovo (AJK). (2025). Position and Safety of Women Journalists in Kosovo. https://agk-ks.org/site/assets/files/3619/position_and_safety_of_women_journalists_in_kosovo_final_en.pdf
- Council of Europe. Fifth Opinion on Kosovo. https://rm.coe.int/5th-op-kosovo-en/1680ab6a79
- Democracy for Development (D4D). (2026). How Much Space Is Given to Women and Men in Online Media? https://d4d-ks.org/en/infographics/how-much-space-is-given-to-women-and-men-in-online-media
- ERA. (2026). Socio-economic Inclusion of the LGBTQI+ Community in Kosovo. https://www.lgbti-era.org/resources/policy-paper-socio-economic-inclusion-of-the-lgbtqi-community-in-kosovo
- European Commission. (2024). Kosovo 2024 Report. https://enlargement.ec.europa.eu/document/download/c790738e-4cf6-4a43-a8a9-43c1b6f01e10_en?filename=Kosovo+Report+2024.pdf
- European Commission. (2025). Kosovo 2025 Report. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025SC0752
- European Commission. (2026). Kosovo 2026 Report, SWD(2026) 692 final. https://enlargement.ec.europa.eu/document/download/fbf2d883-1d14-4e09-8aba-c904ba0d5d9b_en?filename=kosovo-report-2026.pdf
- Kosovo Law Institute (KLI). (2026). KLI: IMC Decisions Are Seriously Undermining Media Freedom in Kosovo. https://kli-ks.org/en/kli-imc-decisions-are-seriously-undermining-media-freedom-in-kosovo/
- Kosovo Media Ownership Monitor (MOM). Gender Imbalance in the Media Industry. https://kosovo.mom-gmr.org/en/findings/indicators/
- Kosovo Press Council. (2026). Public statement on IMC regulatory decisions. https://presscouncil-ks.org/?lang=en&p=18398
- Kosovo Press Council. (2026). Decisions on 27 Complaints. https://presscouncil-ks.org/?lang=en&p=18576
- Kosovo Coalition of NGOs for Child Protection (KOMF). (2024). Joint Declaration with the Independent Media Commission on Protecting Children in the Media. https://komfkosova.org/38811/?lang=en
- Media Diversity Index (MDI). Diversity Index Guide: Notes on Terminology. Internal reference document.
- SafeJournalists Network. (2026). Kosovo Women Journalists' Safety 2024. https://safejournalists.net/publication/kosovo-women-journalists%CC%95-safety-2024/
- South East European Network for Professionalization of Media (SEENPM). The Future of the Media in the Western Balkans and Turkey: Kosovo. https://futureofmedia.seenpm.org/kosovo/
- UN Women. (2024). Kosovo Gender Country Profile. https://www.eeas.europa.eu/sites/default/files/documents/2024/UNWOMEN_GEF_ENG.pdf
- World Bank. (2023). Every Village in Kosovo Now Connected to High-Speed Broadband Internet with World Bank Support. https://www.worldbank.org/en/news/press-release/2023/03/21/every-village-in-kosovo-now-connected-to-high-speed-broadband-internet-with-world-bank-support

Additional online sources

- Association of Journalists of Kosovo (AJK). Official Website and Statute. https://agk-ks.org/
- Independent Media Commission (IMC). Official Website. https://kpm-ks.org/
- Information and Privacy Agency. (2024). Participation in IMC Consultation on Privacy and Protection of Children's Identity. https://aip.rks-gov.net/en/commissioner-for-information-and-privacy-mrs-krenare-sogojeva-dermaku-participated-in-the-panel-privacy-and-identity-protection-during-the-round-table-organized-by-the-independent-media-commiss/
- KALLXO. (2016). National Theatre Workers Complain of Discrimination. https://kallxo.com/shkurt/punetoret-e-teatrit-kombetar-ankohen-per-diskriminim/
- KOHA. (2021). Actors Complain about Discrimination in Professional Support. https://www.koha.net/en/kulture/fond-per-valltare-e-balerine-te-lenduar-aktoret-ankohen-per-diskriminim
- KOHA. (2025). National Theatre Actors' Union Action on Employment Conditions. https://www.koha.net/en/kulture/porosite-e-ministrit-pezullojne-greven-e-teatrit-kombetar-1
- KOHA. (2026). Assembly Elects IMC Members. https://www.koha.net/en/arberi/kuvendi-zgjedh-anetaret-e-kpm-se
- Ombudsperson Institution of Kosovo. Official Website. https://oik-rks.org/en/
- Press Council of Kosovo. Official Website and Published Decisions. https://presscouncil-ks.org/?lang=en&page_id=25
- Radio Television of Kosovo (RTK). Official Website and Multilingual Services. https://www.rtklive.com/



MONTENEGRO

Laws, legal documents and public institution reports

- Law No. 54/2024 "On Audiovisual Media Services, particularly Articles 15(2), 18, 24, 42, 44, 94–101, 128 and 180–184. https://amu.me/wp-content/uploads/2024/07/Zakon-o-audiovizuelnim-medijskim-uslugama.pdf
- Law No. 54/2024 "On Media Law ". https://amu.me/wp-content/uploads/2024/07/Zakon-o-medijima.pdf
- Law No. 60/2024 "On the National Public Broadcaster – Public Media Service of Montenegro, particularly Article 12. https://rtcg.me/upload/media/2024/6/2/14/2/424/1782572/Zakon_o_nacionalnom_javnom_emiteru_-_Javnom_medijskom_servisu_Crne_Gore.pdf
- Law No. 100/2024, " On Electronic Communications", particularly Article 45, as amended, incl. Law 119/26 https://ekip.me/media/documents/general/1787724171_Zakon%20o%20elektronskim%20komunikacijama%20-%20Sl.list%20CG%20br%20100-24,%20119-26%20Pre%C4%8Di%C5%A1%C4%87eni%20tekst.pdf
- Law No. 152/26 "On the Implementation of Regulation (EU) 2022/2065 on Digital Services". https://amu.me/wp-content/uploads/2026/10/Zakon-za-sprovodenje-Regulative-EU-o-digitalnim-uslugama.pdf
- Law No. 111/2026 "On Gender Equality". https://www.gov.me/dokumenta/8e9490f8-4504-4033-a635-c305779e71d1

- Law No. 31/2927 "On Minority Rights and Freedoms", particularly Article 25. https://www.gov.me/dokumenta/b2e7921b-2ec5-4cfe-879e-376c24b9dcc5
- Agency for Audiovisual Media Services of Montenegro (AMU). (2024). Rulebook on Programme Standards in Radio and Television Programmes, particularly Articles 41(6), 43 and 45. https://amu.me/wp-content/uploads/2024/12/01-040-24-1239-Pravilnik-o-programskim-standardima-u-radijskim-i-televizijskim-programima.pdf
- Agency for Audiovisual Media Services of Montenegro (AMU). (2025, December 24). Decision imposing a financial penalty on TV Adria. https://amu.me/wp-content/uploads/2025/12/UP-I-04-043-25-299-6-Rjesenje-AMU-o-izricanju-novcane-kazne-na-emitera-TV-Adria.pdf
- Agency for Audiovisual Media Services of Montenegro (AMU). (2026, May 25). Council decision restricting retransmission of Informer TV for six months . [Link: AMU official announcement; underlying decisions accessible through AMU decision archive.] https://amu.me/obavjestenja/saopstenje-savjet-amu-ogranicio-reemitovanje-informer-tv-na-sest-mjeseci-pokrenuti-postupci-po-sluzbenoj-duznosti-protiv-domacih-emitera/
- Agency for Audiovisual Media Services of Montenegro (AMU). (2026, June 4). Maximum fines imposed in proceedings against TV Adria and TV Prva. https://amu.me/obavjestenja/saopstenje-amu-izrekla-maksimalne-novcane-kazne-u-postupcima-protiv-tv-adria-i-tv-prva/
- Agency for Audiovisual Media Services of Montenegro (AMU). (2025). Analysis of the Visibility of Women and Men in the Main News Programmes of National Television Broadcasters. https://amu.me/wp-content/uploads/2025/01/Analiza-vidljivosti-zena-i-muskaraca-u-centralnim-informativnim-emisijama-nacionalnih-televizija-22.01.2025.pdf
- Agency for Audiovisual Media Services of Montenegro (AMU). (2025, November). Information on the Presence of Children's Programming in the Programmes of TV Broadcasters in Montenegro. https://amu.me/wp-content/uploads/2025/12/Informacija-o-zastupljenosti-programskih-sadrzaja-namijenjenih-djeci-u-programima-TV-emitera-novembar-2025.pdf
- Agency for Audiovisual Media Services of Montenegro (AMU). (2026). Monitoring of the representation of vulnerable social groups in television programmes. https://amu.me/wp-content/uploads/2026/07/04-633-26-747-Analiza-ukljucenosti-ranjivih-drustvenih-grupa-u-opstim-TV-programima-u-Crnoj-Gori.pdf
- Agency for Electronic Communications and Postal Services (EKIP). (2025). Survey of users' satisfaction with electronic communications services. https://ekip.me/media/documents/general/1775630614_IZVJE%C5%A0TAJ%20EKIP%202025.pdf
- Radio and Television of Montenegro (RTCG). Institutional regulations and strategies (including Gender Equality Plan 2023-2027 and ESG Strategy). https://rtcg.me/rtcg/dokumenti/regulativa.html
- Radio and Television of Montenegro (RTCG). Ombudsman for viewers' and listeners' rights: complaints, findings and reports. https://rtcg.me/rtcg/_rtcg/savjet/ombudsman.html
- Media Council for Self-Regulation (MSS). Code of Ethics of Montenegrin Journalists [revised Code]. https://montenegro.osce.org/mission-montenegro/666356
- Ministry of Culture and Media of Montenegro. (2026, October 12). "Parliament adopted the Law on the Implementation of the Digital Services Act". https://www.gov.me/clanak/poslanici-usvojili-zakon-o-sprovodenju-akta-o-digitalnim-uslugama
- Protector of Human Rights and Freedoms of Montenegro. Mandate and complaints mechanism concerning discrimination. https://www.ombudsman.co.me/diskriminacija/index.php

International and local reports

- Centre for Media Pluralism and Media Freedom (CMPF). (2026). Media Pluralism Monitor: Montenegro. https://cmpf.eui.eu/country/montenegro-2026/
- Council of Europe / CEDEM. (2026). Mapping of Hate Speech in Montenegro. https://www.cedem.me/wp-content/uploads/2026/03/HATE-SPEECH-Mapping-Report-final-1.pdf
- Council of Europe. (2026). "Mapping hate speech in Montenegro highlights need for awareness, education and stronger institutional response." https://www.coe.int/en/web/podgorica/-/mapping-hate-speech-in-montenegro-highlights-need-for-awareness-education-and-stronger-institutional-response
- European Commission against Racism and Intolerance (ECRI). (2025). Report on Montenegro. https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/montenegro
- European Commission. (2026, November). Montenegro 2026 Report. https://enlargement.ec.europa.eu/document/download/1f32f797-9247-4cb5-8df8-4d6dd339b508_en?filename=montenegro-report-2026.pdf
- Montenegro Media Institute / South-East European Network for Professionalization of Media (SEENPM). (2023). *Weak Mechanisms and Outdated Code of Ethics: Media Self-Regulation in Montenegro*. https://www.mminstitute.org/wp-content/uploads/2023/11/Ourmedia_MNE-ENG_23-11-21.pdf
- OECD. (2026). Economic Convergence Scoreboard for the Western Balkans 2026. https://www.oecd.org/en/publications/economic-convergence-scoreboard-for-the-western-balkans-2026_0d625fbe-en.html
- OSCE Mission to Montenegro. (2022). *Children, Parents and Media in Montenegro*. https://montenegro.osce.org/mission-to-montenegro/534419
- OSCE. (2024). Research on media self-regulation in Montenegro. https://cdn.osce.org/sites/default/files/f/documents/e/9/578866.pdf
- Reporting Diversity Network / Centre for Investigative Journalism of Montenegro (CIN-CG). (2025). *Monitoring Report on Hate Speech in Montenegro 2025*. https://www.reportingdiversity.org/resources/monitoring-report-on-hate-speech-in-montenegro-2025/
- SafeJournalists / Trade Union of Media of Montenegro (SMCG). (2026). Montenegro: Indicators on the Level of Media Freedom and Journalists' Safety Index 2025. https://safejournalists.net/wp-content/uploads/2026/06/Montenegro-Indicators-on-the-Level-of-Media-Freedom-and-Journalists-Safety-Index-2025.pdf
- Media Ownership Monitor Montenegro. (2023). Findings and media ownership indicators. https://montenegro.mom-gmr.org/en/findings/findings/#!717e16ed45b3ca7086aea0aed927d1bf
- Trade Union of Media of Montenegro (SMCG). Institutional information and legal assistance for members. https://sindikatmedija.me/en/
- Vijesti. (2026). "AMU: About vulnerable social groups, little content but no negative reporting" [news report cited as secondary source for AMU monitoring]. https://en.vijesti.me/news-b/society/820042/amu-about-vulnerable-social-groups--little-content-but-no-negative-reporting



NORTH MACEDONIA

Laws and Regulations

- Commission for Prevention and Protection against Discrimination (October 2020). *Law on Prevention and Protection against Discrimination*. https://kszd.mk/wp-content/uploads/2021/11/Закон-за-спречување-и-заштита-од-дискриминација.pdf
- Ministry for Digital Transformation (n.d.). *Law on Media*, redacted and consolidated text. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-OI9M.pdf
- Ministry for Digital Transformation (n.d.). *Law on Audio and Audiovisual Media Services* redacted and consolidated text. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-9eUQ.pdf
- State Public Prosecutor's Office of the Republic of North Macedonia(n.d.), *Criminal Code*, unofficial consolidated text. https://jorm.gov.mk/wp-content/uploads/2016/03/законик-пречистен-текст.pdf
- Ministry for Digital Transformation (n.d.). *Law on Electronic Communications* redacted and consolidated text. https://portal.mdt.gov.mk/post-body-files/zakoni-mdt-file-teno.pdf
- The Council of Media Ethics of Macedonia (n.d.). *Rules of Membership*. https://semm.mk/en/rules-of-membership/
- The Council of Media Ethics of Macedonia (July 2026). *Code of Journalists of Macedonia*. https://semm.mk/kodeks-na-novinarite-na-makedonija/

Websites of Institutions

- Agency for Electronic Communications https://aek.mk/
- Agency for Audio and Audiovisual Media Services https://avmu.mk/
- Association of Journalists of Macedonia https://znm.org.mk/
- Commission for Prevention and Protection against Discrimination https://kszd.mk/
- Independent Union of Journalists and Media Workers https://ssnm.org.mk/
- Independent Trade Union of Education, Science and Culture https://sonk.org.mk/en/
- Union of Culture of the Republic of Macedonia https://skrm.mk/
- Public Broadcasting Enterprise MRT https://mrt.com.mk/

Reports and Media Articles

- Agency for Audio and Audiovisual Media Services. (March 2018). *Annual Report on the Work of the Agency for Audio and Audiovisual Media Services for year 2016*. https://avmu.mk/wp-content/uploads/2017/06/1._Godishen_izveshtaj_za_rabotata_na_AVMU_za_2016_godina.pdf
- Agency for Audio and Audiovisual Media Services. (March 2018). *Report on the Work of the Agency for Audio and Audiovisual Media Services for year 2018*. https://avmu.mk/wp-content/uploads/2017/06/Годишен-извештај-за-работа-на-АВМУ-за-2017-година.pdf
- Agency for Audio and Audiovisual Media Services. (March 2018). *Discrimination, Intolerance and Hate Speech on the "Milenko Nedelkovski Show"* – WRITTEN REPORT ON THE CONDUCTED PROGRAMME MONITORING. https://avmu.mk/wp-content/uploads/2018/03/Pismen-izvestaj-za-izvrsen-programski-nadzor-vonreden-na-Alfa-TV-Skopje.pdf

- Agency for Audio and Audiovisual Media Services (September 2026). *Gender In the Media 2025: Gender Issues and the Representation of Women and Men in the Media Campaign for the 2025 Local Elections*. https://avmu.mk/2026/09/21/родот-во-медиумите-за-локалните-избор/
- Agency for Audio and Audiovisual Media Services (July 2026). *Structure of Employees in the Audio and Audiovisual Media Industry in Year 2025*. https://avmu.mk/wp-content/uploads/2026/07/Структура-на-вработените-во-аудио-и-аудиовизуелната-медиумска-индустрија-во-2025-година.pdf
- Constitutional Court of the Republic of North Macedonia (October 2024). *Decision no. 90/2024*. https://ustavensud.mk/2024/10/y-6p-90-2024-2/
- Commission for Prevention and Protection against Discrimination (March 2025). *Annual Report 2024*. https://kszd.mk/wp-content/uploads/2025/04/Годишен-извештај-2024-КСЗД.pdf
- Commission for Prevention and Protection against Discrimination (March 2026). *Report of KSZD for year 2025*. https://kszd.mk/извештај-на-ксзд-за-2025-година/
- Centre for Media Pluralism and Media Freedom. *Media Pluralism Monitor Report 2026, The Republic of North Macedonia*. https://cmpf.eui.eu/country/the-republic-of-north-macedonia-2026/
- Commission for Prevention and Protection against Discrimination (December 2022). *Decision - case no: 08-118/8*. https://kszd.mk/wp-content/uploads/2023/01/08-118-од-23.12.22-не-се-поведува-постапка.pdf
- European Union Agency for Fundamental Rights, Database 2012-2024 On Anti-Muslim Hatred (February 2023), *North Macedonia / Commission on Prevention and Protection Against Discrimination / 08-141/1*. https://fra.europa.eu/en/databases/anti-muslim-hatred/case-law/9648
- European University Institute, Robert Schuman Centre for Advanced Studies (June 2024). *Monitoring of Media Pluralism in the Digital Age*. https://cadmus.eui.eu/server/api/core/bitstreams/69e227c0-4f70-5bbb-9b3d-d115da405895/content
- Independent Union of Journalists and Media Workers, RESIS Institute (March 2024). *Working Conditions in the Media Sector - Professional Status and Labour Rights of Journalists and Media Workers*. https://resis.mk/images/abut-us/PDF/rabotnite-uslovi-vo-mediumskiot-sektor.pdf

---



SERBIA

- Anđušić, A. (2024). *Media monitoring report on hate speech in Serbia*. Reporting Diversity Network. https://www.reportingdiversity.org/wp-content/uploads/2024/04/Monitoring-Report-on-Hate-Speech-in-Serbia.pdf
- ANEM. (2025, January 9). *Strategy for the development of the media system of Serbia (2020–2025) and its implementation*. Association of Independent Electronic Media. https://anem.org.rs/en/strane/strategija-razvoja-medijskog-sistema-srbije-2020-2025-i-njena-implementacija
- Article 19. (2025, June 19). *Serbia: Media regulator elections make a mockery of EU-required reforms*. https://www.article19.org/resources/serbia-media-regulator-elections-make-a-mockery-of-eu-required-reforms/

- Baletic, K. (2024, July 4). *Under new rules, Serbia gives up on quality TV programmes for children*. Balkan Insight. https://balkaninsight.com/2024/07/04/under-new-rules-serbia-gives-up-on-quality-tv-programmes-for-children/
- Bjeletic, G. (2019, May 30). Trideseti rođendan niškog dopisništva RTS [The 30th anniversary of the RTS Niš bureau]. *Južne vesti*. https://www.juznevesti.com/drustvo/trideseti-rodjendan-niskog-dopisnistva-rts/
- Blic. (2026, July 10). *Skupština potvrdila više odluka: Izabrani predsednik i članovi Saveta RATEL-a* [Assembly confirms several decisions: President and Council members of RATEL elected]. *Blic.rs*. https://www.blic.rs/vesti/politika/skupstina-potvrdila-vise-odluka-izabrani-predsednik-i-clanovi-saveta-ratel-a/5zh1gnn
- Commissioner for the Protection of Equality. (2025). *Official portal of the Commissioner for the Protection of Equality*. Government of the Republic of Serbia. https://ravnopravnost.gov.rs/en/
- Commissioner for the Protection of Equality. (2026). *Annual report of the Commissioner for the Protection of Equality for 2025*. https://ravnopravnost.gov.rs/wp-content/uploads/2026/03/PZR-RGI-2025.pdf
- Council of Europe. (2026, July 7). *Regulatory failures of REM undermine media pluralism and journalist safety* (Safety of Journalists Platform). https://fom.coe.int/en/alerte/detail/107644427
- Drašković, B. (2023). Framing of poverty in TV reporting in Serbia. *ResearchGate*. https://www.researchgate.net/publication/370344939_Framing_of_poverty_in_TV_reporting_in_Serbia
- EU Delegation to the Republic of Serbia. (2024, February 21). *Connecting Rural Communities for Digital Future*. https://europa.rs/connecting-rural-communities-for-digital-future/?lang=en
- European Commission. (2024). *Serbia 2024 report* (Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions). https://commission.europa.eu/document/download/b0b87aac-b88d-405b-bdc5-4e32f0765926_en?filename=Country+report+-+Serbia+-+EN.pdf
- Freedom House. (2025). *Freedom on the Net 2025: Serbia*. https://freedomhouse.org/country/serbia/freedom-net/2025
- IJAS & OBCT. (2024, July). *The rule of law and media freedom in Serbia: Shadow report 2024*. Independent Journalists' Association of Serbia & OBC Transeuropa. https://en.nuns.rs/media/2024/07/Shadow-Report_-Rule-of-Law-and-Media-Freedom-in-Serbia-1.pdf
- Matić, J., & Ranković, L. (2026, February). *Prilog za evaluaciju Strategije razvoja sistema javnog informisanja u Republici Srbiji 2020–2025 – Cilj 4* [Contribution to the evaluation of the Strategy for the development of the public information system in the Republic of Serbia – Media Strategy (MS) 2020–2025 – Goal 4]. OSCE Mission to Serbia. https://serbia.osce.org/sites/default/files/documents/official_documents/2026/03/Prilog%20za%20evaluaciju%20Strategije%20razvoja%20sistema%20javnog%20informisanja%20u%20Republici%20Srbiji%202020%E2%80%932025%20-%20Cilj%204.pdf
- Miletić, S. (2022). *Ethnic minorities and Balkan broadcasters part 1: Serbia and Croatia*. Media Diversity Institute. https://www.media-diversity.org/national-minorities-and-balkan-broadcasters-part-1-serbia-and-croatia/

- Milivojević, S. (2021, June). *Rodna struktura direktorskih i uredničkih funkcija u informativnim medijima* [Gender structure of director and editorial functions in the information media]. Embassy of the Kingdom of Norway & OSCE Mission to Serbia. https://cdn.osce.org/sites/default/files/f/documents/0/c/491866.pdf
- Milutinović, I. (2026). *Monitoring media pluralism in the European Union: Results of the MPM 2026 country report: Serbia*. EUI Centre for Media Pluralism and Media Freedom. https://cadmus.eui.eu/server/api/core/bitstreams/823d434b-1666-4a48-b3b4-05e773dba5b7/content
- National Contact Centre for Child Safety on the Internet. (2026). *Official portal*. Ministry of Information and Telecommunications. https://pametnoibezbedno.gov.rs/
- Novi Sad School of Journalism. (2021, July 12). *Medijski sadržaji slabo pristupačni osobama sa invaliditetom, a izveštavanje odlikuje niz negativnih praksi* [Media content barely accessible to persons with disabilities, with reporting marked by negative practices]. https://novinarska-skola.org.rs/medijski-sadrzaji-slabo-pristupacni-osobama-sa-invaliditetom-a-izvestavanje-odlikuje-niz-negativnih-praksi/
- Ocokoljić, M. (2025, July). On the Sidelines of Communication: Age as a Marginalizing Factor of Representation in Advertising. Romanian Journal of Communication and Public Relations. https://www.journalofcommunication.ro/index.php/journalofcommunication/article/download/811/408
- Official Gazette of the Republic of Serbia. (2025). *Zakon o javnim medijskim servisima* [Law on Public Service Broadcasting]. Official Gazette of RS, No. 83/2014, 6/2016... https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2014/83/6/reg
- Official Gazette of the Republic of Serbia. (2021). *Zakon o zabrani diskriminacije* [Law on the Prohibition of Discrimination]. Official Gazette of RS, Nos. 22/2009 & 52/2021. https://ravnopravnost.gov.rs/wp-content/uploads/2021/06/Zakon-o-zabrani-diskriminacije_-22_2009-3-52_2021-4.pdf
- OSCE Mission to Serbia. (2026, February). *Projekat „Jačanje slobode izražavanja i slobode medija u Srbiji" – Informisanje na jezicima nacionalnih manjina* [Project "Strengthening freedom of expression and media freedom in Serbia" – Information in national minority languages]. https://serbia.osce.org/sites/default/files/documents/official_documents/2026/03/Informisanje%20na%20jezicima%20nacionalnih%20manjina%20i%20studija%20slu%C4%8Daja-Mediji%20na%20ma%C4%91arskom%20jeziku.pdf
- Press Council. (2025). *Kodeks novinara i novinarki Srbije* [Code of Journalists of Serbia]. https://savetzastampu.rs/wp-content/uploads/2024/12/KODEKS-novinara-i-novinarki-2025-korekcija.pdf
- Press Council. (2026, January). *Izveštaj o monitoringu poštovanja Kodeksa novinara i novinarki Srbije u dnevnim novinama u periodu od 1. jula do 31. decembra 2025. godine* [Report on the monitoring of compliance with the Journalists' Code of Ethics in Serbian daily newspapers (1 July 2025 – 31 December 2025)]. https://savetzastampu.rs/wp-content/uploads/2026/01/Izvestaj-FINAL-2025.-1.pdf
- RATEL. (2024a). *Organizational structure*. Regulatory Agency for Electronic Communications and Postal Services. https://www.ratel.rs/en/organizational-structure
- RATEL. (2024b). *Pravilnik o univerzalnom servisu u oblasti elektronskih komunikacija* [Rulebook on universal service in electronic communications]. Regulatory Agency for Electronic Communications and Postal Services. https://www.ratel.rs/en/univerzalni-servis

- REM. (2024). *Rulebook on the accessibility of programme content to persons with hearing or visual impairments*. Regulatory Authority for Electronic Media. https://www.rem.rs/uploads/files/Pravilnici/Pravilnik o dostupnosti programskih sadrzaja osobama ostecenog sluha odnosno vida - e.pdf
- REM. (2025). *Izveštaj o ispunjavanju zakonskih i programskih obaveza Radio-televizije Srbije za 2024. godinu* [Report on the fulfillment of legal and programming obligations of Radio Television of Serbia for the year 2024]. Regulatory Authority for Electronic Media. https://www.rem.rs/uploads/files/izvestaji_o_nadzoru/Izvestaj_o_ispunjavanju_zakonskih_i_programskih_obaveza_Radio-televizije_Srbije_za_2024._godinu.pdf
- RTS. (2021, November 16). *Trezor: Dopisnička mreža RTS-a* [Treasury: RTS correspondent network]. Radio Television of Serbia. https://www.rts.rs/lat/tv/rts2/4589202/trezor.html
- SEENPM. (2026a, May). *Governance of social media platforms and regulation of online media in Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Türkiye*. South East European Network for Professionalization of Media. https://seenpm.org/wp-content/uploads/2026/05/Integral-Study_Governance-of-Social-Media-Platforms-and-Regulation-of-Online-Media_ENG_2026.pdf
- SEENPM. (2026b, May). *Governance of social media platforms and regulation of online media in Serbia* (Country Annex). South East European Network for Professionalization of Media. https://seenpm.org/wp-content/uploads/2026/05/Serbia_Online-Governance-and-Regulation_Annex_ENG_2026.pdf
- Slavko Ćuruvija Foundation. (2018, August 2). *Vojvodina public service TV neglects topics from Vojvodina region*. https://www.slavkocuruvijafondacija.rs/en/vojvodina-public-service-tv-neglects-topics-from-vojvodina-region/
- UNS. (2026). *Šta radimo* [What we do]. Journalists' Association of Serbia. https://www.uns.org.rs/sta-radimo.html