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**GUIDELINES ON MEDIA ANALYSIS DURING
ELECTION OBSERVATION MISSIONS**

**by the OSCE Office for Democratic Institutions
and Human Rights (OSCE/ODIHR)
and the Venice Commission**

**Adopted by the Council for Democratic Elections
at its 29th meeting
(Venice, 11 June 2009)
and the Venice Commission
at its 79th plenary session
(Venice, 12-13 June 2009)**

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TABLE OF CONTENTS

FOREWORD	3
1. MONITORING THE MEDIA DURING ELECTIONS: THE OSCE CONTEXT	3
2. THE MEDIA IN THE ELECTORAL PROCESS	5
A. The rights of voters	5
B. The rights of candidates and parties	5
C. The freedom of the media	6
2.1 Types of Media and Election Coverage	6
A. The electronic media	6
B. The print media	7
C. The Internet and other new media: a general perspective	8
3. MEDIA ANALYSIS WITHIN ELECTION OBSERVATION MISSIONS: AN OVERVIEW	9
3.1 Tasks of the Media Analyst	9
3.2 The Place of the Media Analyst in a Mission	9
3.3 Media Analysis: What Are We Trying to Determine?	10
4. GUIDELINES FOR MEDIA ANALYSIS: SENSITIVE ISSUES, BENCHMARKS, AND BEST PRACTICES	11
4.1 The Legal Framework, Election Regulations, and Election Administration	12
4.2 Media Landscape and the Role of the Authorities	13
4.3 Media Coverage	14
A. Pluralism and regulation	14
B. The advantage of the incumbent	14
4.4 The Regulation of Media Coverage during Elections	14
5. CONDUCTING MEDIA ANALYSIS	18
5.1 Assessing the Role of the Media during an Election	18
6. PROCESSING AND ANALYSING DATA	25
6.1 Units of Context	25
6.2 Recording Units	26
6.3 Coding	26
6.4 Measurement System	27
6.5 Quality of Coverage	27
6.6 Weighting Cases	28
6.7 Interpreting Data	28

FOREWORD

1. The assessment of media coverage of the election campaign plays a fundamental role in the overall election observation methodology. This publication was prepared to describe the media monitoring methodology used by the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) during its observation activities. This handbook was based on the joint OSCE/ODIHR and Council of Europe's Guidelines on Media Analysis During Election Observation Missions, adopted by the Venice Commission of the Council of Europe in 2005.
2. The handbook includes a set of standards for coverage of electoral campaigns, both by the public and private broadcast media, as well as by the press. However, the purpose of this handbook is not to provide a detailed catalogue of those standards, but to highlight certain common principles that are important when assessing an electoral process from the point of view of international observers. Detailed references to such standards and commitments could be found in the joint OSCE/CoE publication available at [http://www.venice.coe.int/docs/2005/CDL-AD\(2005\)032-e.asp](http://www.venice.coe.int/docs/2005/CDL-AD(2005)032-e.asp) (CDL-AD(2005)032).
3. The final part of this publication includes some basic information on technical aspects of media monitoring, explaining specifically the role of the media analyst in election observation missions. However, this is not a technical manual detailing every aspect of that work.
4. The OSCE/ODIHR would like to express its gratitude to the European Commission for supporting the preparation and publication of this handbook.
5. These guidelines were adopted by the Council for Democratic Elections at its 29th meeting (Venice, 11 June 2009) and the Venice Commission at its 79th plenary session (Venice, 12-13 June 2009).

1. MONITORING THE MEDIA DURING ELECTIONS: THE OSCE CONTEXT

6. We should begin by establishing two important and related facts. The first is that all of the OSCE's participating States gave OSCE/ODIHR a mandate to conduct long-term observation of all aspects of an election process from the campaign through Election Day up to the announcement of results. This mandate includes a specific statement about the need to assess the functioning of the media. This leads us to our second and related fact, which is that the media play a vital role during any election, and it thereby follows that any observation effort would pay significant attention to the activities of the media and their impact on the election.

OSCE participating States task ODIHR to "play an enhanced role in election monitoring before, during and after elections. In this context, the ODIHR should assess the conditions for the free and independent functioning of the media." – OSCE Budapest Summit, 1994

7. During any election, the media provide an invaluable channel of information between the candidates and the public. By providing an arena for public debate, and by informing citizens of the positions of the candidates and parties, the media enable the electorate to make an informed decision when they go to vote. The importance of this last point cannot be overstated, as the ability of voters to make an informed choice is one of the key aspects of a democratic election.
8. Countless steps have been taken to ensure that the media operate in a fair and balanced manner when performing their proper function in any democratic society. These include the adoption of numerous intergovernmental agreements on freedom of the media and expression, recommendations by international and regional organizations, national laws on the functioning of the media, the establishment of national media regulatory bodies, and the introduction of codes of conduct by media organizations themselves.

9. Many of the states that make up the OSCE are subject to commitments undertaken within the framework of various institutions, and, of course, they are guided by their own national legislation. In addition, however, all OSCE states have agreed to a number of specific OSCE commitments that deal with relevant issues such as freedom of expression, freedom of the media, and holding of democratic elections.

10. The main provisions of many of those commitments can be summarized as follows:

- Free media is one of the basic conditions for a pluralistic and democratic society;
- The right to freedom of expression is a fundamental human right and a necessary condition of a democratic system. Therefore, autonomous and pluralistic media are essential to a free and open society and for holding those in power to account;
- Independent and free media are of particular importance in safeguarding human rights and fundamental freedoms;
- The implementation of OSCE commitments in the media field should be strengthened to ensure a genuinely free system for citizens;
- Freedom of expression, including the right to communication and the right of the media to collect, report, and disseminate information, news, and opinions, is a fundamental human right;
- The public shall enjoy the freedom to receive and impart information and ideas without interference by public authorities, including through foreign publications and foreign broadcasts;
- Media should enjoy unrestricted access to foreign news and information services;
- Any restrictions on the right to freedom of expression must be prescribed in accordance with international standards. Any limitations on freedom of expression must be respectful of three main principles:
 - **Legality:** any restriction on the freedom of expression must be defined by law;
 - **Legitimacy:** legitimate purposes include securing respect for the rights and freedoms of others, preventing disorder or crime, protecting national security and public order, as well as public health or morals;
 - **Proportionality:** any provisions implying restrictions on the right to freedom of expression must be proportionate to the aim that such restrictions pursue;
- Attacks on, and harassment of, journalists must be condemned and those responsible should be held accountable;
- Measures should be taken to protect journalists engaged in dangerous professional missions;
- The participatory rights of individuals and groups include their right to unimpeded access to the media on a non-discriminatory basis;
- No legal or administrative obstacles shall obstruct access to the media within the electoral process;
- Access to the media must be guaranteed on a non-discriminatory basis for all political forces and individuals participating in the electoral process.

11. In addition, the OSCE representative on freedom of the media follows relevant media developments in participating States and promotes full compliance with OSCE principles and commitments regarding freedom of expression and free media. The following issues have often been emphasized in the representative's statements:

- Protecting journalists' investigative rights by not holding journalists criminally liable for breach of secrecy when classified information is published, and advocating their right to protect the anonymity of sources;
- Strengthening the role of public-service broadcasters;

- Advocating good governance on the Internet and fighting undue governmental control and overregulation of the Internet;
- Continuous efforts against misuse of hate-speech laws and against attempts to label offending or critical views as punishable extremism;
- Promoting media self-regulation as the best way to handle/correct journalists' professional mistakes;
- Free media and an independent, effective judiciary play mutually reinforcing roles in a democracy;
- The use of criminal defamation laws, including their abuse by politicians and other public figures, is intolerable. Criminal defamation laws should be repealed and replaced with appropriate civil defamation laws;
- The abuse of public finances by governments and public institutions for the purpose of influencing the content of the media is unacceptable;
- It is the responsibility of media owners to respect the right to freedom of expression and, in particular, the editorial independence of journalists;
- Promotion of diversity, including gender equality and equal opportunity for all sections of society to access the airwaves, is a primary goal of broadcast regulations;
- Broadcast regulators and governing bodies must be protected against political and commercial interference;
- Undue concentration of media ownership should be prevented through appropriate measures;
- There should be a separation of political activities from the media interests of those politicians and members of government who own a media outlet.

2. THE MEDIA IN THE ELECTORAL PROCESS

12. The media have an important role to play during an election period. In addition to reporting on the performance of the incumbent government, the media can educate voters on how to exercise their rights, report on campaign developments, provide a platform for the candidates to debate one another and communicate their message to the electorate, and also monitor the vote count and report the results to the public. Candidates have the right of reply to statements or reports in the media, which were inaccurate or offensive, and to be able to exercise that right during the election campaign.

13. When observing how the media function during an election, it is important to consider their degree of autonomy, i.e., their freedom from political or other interference, as well as the degree of media diversity.¹ And in this framework, we should consider three sets of interrelated rights and duties: those of the voters, the parties and candidates, and of the media themselves.

A. The rights of voters

14. Voters should be provided with all the information they need to exercise their right to vote. The right of voters to make an informed choice implies that the media should inform them in a professional and accurate manner of the platforms and views of the different candidates and of the events of the electoral campaign and the electoral process, including the vote count and election results. Also, the media should assist in explaining to the electorate how to exercise their right to political participation, particularly how to vote.

B. The rights of candidates and parties

15. Candidates and parties have the right to communicate their platforms and their views.

¹ For more on this subject, see D.C. Hallin and P. Mancini, *Comparing Media Systems: Three Models of Media and Politics* (Cambridge: Cambridge University Press, 2004).

Politicians should have access to the media to inform the electorate about their policies and opinions on matters of public interest. The media also provide an arena in which candidates can debate. Candidates can be covered in a variety of formats and can have access to the media in a number of ways; what really matters is that they should have equal opportunity to inform the voters about their policies and that there is no discrimination against them. Candidates have the right of reply to statements or reports in the media, which were inaccurate or offensive, and to be able to exercise that right during the election campaign.

16. While political parties and candidates enjoy the right of access to the media, they should not abuse it. Politicians should be aware that their right of access to the media should not limit or be detrimental to the freedom of expression of journalists. One of the basic principles underlying the freedom of expression of journalists is real editorial independence from pressure on the part of governmental or private interest groups or state agencies. Above all, media owners or managers linked to political parties should not abuse their positions to put pressure on journalists to favour a particular political party or candidate.

C. The freedom of the media

17. The media have the freedom to inform the public about an election campaign and to express their opinions. One of the functions of the media, is to cover political issues in the most impartial way. The media should also have the freedom to cover all relevant election-related issues, including the work of the election administration, alternative policies and platforms, the activities of candidates, problems and incidents occurring during the election campaign, Election Day procedures, and the announcement of the election results. In addition, the media have the freedom to take an active role in the process of informing voters by offering them a diverse range of views, which include those of journalists and political analysts. The media should have the freedom to criticize politicians for their platforms or their public record. A number of factors determine to what extent the media succeed in informing the public in a correct, accurate, transparent, and balanced manner. Media managers and owners should accept the principles of journalistic ethics and independence, and they should not exert pressure on their employees to act at variance with these principles.

2.1 Types of Media and Election Coverage

18. While media can be classified according to a variety of criteria, we are most interested in the type of medium – print or electronic – and the kind of ownership.

A. The electronic media

19. Electronic media are often subject to a higher degree of control by public authorities than print media. This is usually justified by two main arguments:

- The need to guarantee the fair allocation of limited public resources (airwaves and frequencies); and
- The need to impose a certain level of public obligation on broadcasters. Broadcast media (television in particular) are considered more than a simple tool of communication, as they are an essential instrument for promoting social, cultural, and political objectives. It is therefore important to regulate their activity, through self regulatory mechanisms (professional associations, codes of conduct etc).

20. The main difference within the electronic media is between those that are publicly and privately owned. This distinction has consequences for the degree of control and regulation imposed on them by public institutions.

State/public broadcasters²

21. The underlying idea of public-service broadcasting is that the private sector alone cannot ensure pluralism in the broadcast sphere. Public broadcasters tend to be held to higher standards of responsibility with respect to principles of universality, diversity, independence, distinctiveness from other kinds of broadcasters, and accountability. The stricter regulation imposed on these broadcasters is justified by the need to protect them from undue interference or control by the government, thus enabling journalists to freely operate according to their obligation to the public. In many countries, however, public or state broadcasting channels remain under tight government control.

22. While all media are expected to offer responsible and fair coverage, it is particularly incumbent upon state/public media to uphold more rigorous standards since they belong to all citizens. Using state/public media to promote a certain political party or candidate is therefore an illegitimate manipulation of the public. The state media are more vulnerable to such pressure from the authorities, especially in those countries where they have not yet been transformed into truly independent public-service broadcasters. State-controlled broadcasters are often paralyzed by frequent interference by the authorities.

23. Publicly funded broadcasters should provide a complete and impartial picture of the entire political spectrum in their coverage of an election, given that they are obliged to serve the public and offer a diverse, pluralistic, and wide range of views.

Private broadcasters

24. Although private broadcasters are commercial enterprises, they are generally asked to comply with certain obligations (particularly during an election campaign). The licence they are provided with, which is assigned on a periodic basis by a public authority, may include certain requirements in relation to news, information, and current-affairs programmes and voter education.

25. In any case, the relevance of private broadcasters as sources of information in an election campaign depends partly on the importance – in terms of penetration, coverage, and audience – of public broadcasters. For instance, where the public/state media are alone in covering the entire national territory while private broadcasters cover only limited geographical areas, the importance of the latter is limited. In contrast, in states with a weak tradition of public broadcasting, private broadcasters are likely to be the main source of election information for voters.

26. Private broadcasters should also abide by standards of impartiality in their news and current-affairs programmes. The primary role of private broadcasters is not to counterbalance biased coverage in the state media. Given their popularity, however, they may often supplement public media by offering a more diverse range of views.

B. The print media

27. Private print media are generally entitled to a larger degree of partisanship than the publicly financed press and the broadcasting media. Print media often play an even greater

² Public broadcasters are financed with public money, and they offer a universal service (for the entire public) and are accountable to the nation as a whole. They do not back or favour any party or the government. State broadcasters are also financed with public money, but they are owned by the state or the government and are under the direct control of their owners. What is important here is the fact that, whatever their ownership, these broadcasters, being mainly financed with taxpayers' money, either as an allocation from the state budget or as a fee paid by citizens, have stronger obligations than private ones with regard to their production and coverage.

role than the electronic media in acting in the public interest as watchdogs and opinion makers. It is generally accepted that the press may explicitly express a political opinion. Also, the general practice of self-regulation adopted by the print media (through codes of conduct and press councils) can be interpreted as evidence that the press does not need to be bound by rules set by external bodies and that the media can be responsible for their own editorial choices. Therefore, even during an election period, print media have fewer obligations to be balanced towards candidates and political parties; they are subjected to less stringent regulation than electronic media.

28. The argument used to justify this position is that the print media do not benefit from a public and limited commodity such as airwaves. Therefore, their public obligation to impartiality and balance is commensurately less than that of the electronic media.

C. The Internet and other new media: a general perspective

29. As a result of the emergence of new media and communication technologies, a new phase for political communication has radically changed relations among candidates and voters.

30. The new media offer political parties and candidates opportunities to diversify their campaigns for different target audiences in a very simple and effective way. A *net-cast* model, opposed to the traditional *broadcast* model, facilitates the dissemination of specific messages to certain segments of the population. There is similar potential in the use of text messages to mobile telephones, a technique that political campaigners in some countries are beginning to exploit.

31. The Internet has undoubtedly widened the possibilities of informing a larger section of the population by creating more opportunities for ordinary voters to generate political news and opinions. On the technical side, election authorities are already using the Internet to publicize information about the electoral process, including voters lists, complaints received, vote tabulation, and the announcement of results.

32. Although the potential is enormous, social inequalities still limit the impact of new technologies. The digital divide – unequal access to new technologies because of cultural and economic factors – is still an undeniable obstacle to regular use of the Internet. The same applies to a lesser degree to the use of mobile telephones in political communications. These are more widely available in poorer countries and in poorer sections of the population, often because of the limited availability of landlines (which is itself one of the factors limiting Internet access).

33. A potentially controversial issue related to the role and obligations of the Internet in the electoral process deals with what regulations should be imposed on websites, particularly with regard to silence periods and opinion polls. The matter is part of a wider debate about the degree of freedom the Internet should enjoy and the extent to which regulations can realistically be applied to this medium. In general, any control over the freedom of Internet users and publishers has been widely frowned upon. The World Wide Web is a pluralistic and unlimited media environment accessible to everyone. It remains largely unregulated, and many argue that it is neither possible nor desirable to regulate it.

34. The potential strength of the Internet has been evidenced by the frequent attempts by certain regimes to control access to the World Wide Web through a variety of mechanisms, such as direct state ownership of Internet providers, control of their archives, or efforts to obstruct access to “politically subversive” websites. Also, the content providers of many websites may be subject to the same pressures as journalists in the traditional media.

3. MEDIA ANALYSIS WITHIN ELECTION OBSERVATION MISSIONS: AN OVERVIEW

3.1 Tasks of the Media Analyst

35. In essence, the task of the media analyst is to gather sufficient information to answer a number of questions about the performance of the media during an election period. The media analyst can apply a variety of methods in order to gather the necessary information, and he or she does so as part of a team that includes a dedicated media-monitoring unit and the members of the core staff of the election observation mission (EOM).

36. The rest of this chapter will deal with the types of issues that the media analyst should be concerned with and specific questions to ask. For now, however, let us begin with an overview of media analyst's position in the core team and the functions of the media-monitoring unit.

3.2 The Place of the Media Analyst in a Mission

37. During any election observation mission, all of the various analysts have to work together in order to produce meaningful results. In some cases, this involves the simple sharing of information; in other cases, it is necessary for members of the core team to work closely together to achieve a certain goal.

38. The following is an outline of some of the interactions that the media analyst could expect to have with the other members of an election observation mission:

- **Head of mission:** The media analyst should provide the head of mission with reports about the media coverage of the EOM. The media analyst should also regularly update the head of mission on the findings of the media monitoring;
- **Legal analyst:** The media analyst will have to work closely with the legal analyst when studying the legal framework regulating the media. Co-operation is also important when media-related complaints are brought to the courts or electoral commissions. Any follow-up of such complaints should be monitored in liaison with the legal analyst;
- **Election analyst:** The election analyst provides the media analyst with a list of candidates and instructions or decisions of the election commission related to the media. The media analyst should provide the election analyst with information about voter-education campaigns in the media and about news related to the election administration;
- **Political analyst:** The political analyst provides the media analyst with information on media-related complaints filed by parties and candidates. Information about financing and limits on campaign expenditures of parties and election contestants can be relevant when paid political advertisements are allowed by national law. The media analyst should provide the political analyst with any published opinion polls;
- **LTO co-ordinator and LTOs:** The LTO co-ordinator can ask LTOs to gather information about local media and problems faced by journalists limiting the freedom of the media. In some cases, LTOs may be asked to collect recorded or print material for the media-monitoring unit. The media analyst may provide the LTO co-ordinator with news on the election administration and election campaigns at the local level, as well as stories related to incidents or other security issues happening in the regions.

3.2.1 The Media Unit

39. An election observation mission's media-monitoring unit is usually made up of a number of national media assistants. National support staff are essential to assist the work of the media

analyst, as they perform a number of important tasks, including translating, interpreting, and monitoring the media.

40. When hiring national staff, the media analyst should look for assistants who are familiar with the political context and the media situation of the country. They should also have some experience in media studies or social research. In addition, media assistants must not be members of political parties or movements in order to avoid any kind of speculation and allegations concerning their impartiality.

41. Once a team has been hired, the media analyst will have to provide them with the necessary training in order to perform their duties properly. This can be divided into two phases:

1. In the first phase, the analyst explains the purpose of media analysis, the methodology to be applied, and the kind of output expected. The methodology should be provided in writing, along with examples and case studies for discussion. This phase should last about three days.
2. In the second phase, lasting about four days, the media analyst works closely with each member of the team to determine what they have learned and whether or not they are ready to carry out their tasks.

42. Media assistants should also be provided with the laws and rules regulating media coverage during an election campaign, ODIHR's *Election Observation Handbook*, and any other documents necessary to gain a complete understanding of the goals of their activity, as well as of the overall aim of the EOM.

Code of conduct

43. It is essential that all members of an election observation mission, including national media assistants, perform their duties in a manner that conforms with ODIHR's code of conduct for election observers. They may have their own private political opinions, but they cannot let them interfere in their work.

3.3 Media Analysis: What Are We Trying to Determine?

44. The media analyst is certainly concerned with media conduct on the level of individual media organizations and journalists, but only within the context of the media system as a whole. When carrying out analysis of the media during an election period, the media analyst determines how autonomous the media system is from the political system and also the level of diversity within that system.

45. When doing this, the media analyst takes into account the basic rights of the three actors mentioned in Chapter 2:

- Voters' right to receive information;
- Candidates' right to impart information;
- The media's freedom of expression.

Voters' right to receive information

- Did voters receive sufficient accurate information from the media to make an informed choice?
- Did voters have the opportunity to consult a variety of sources of information with different points of view?

- Did the media provide voters with sufficient information on the election administration and voting procedures? Were voter-education programmes sufficient to effectively and accurately inform the electorate about the voting process?
- Did the public/state media comply with their obligations to inform the public on relevant issues of the electoral process?
- Were public/state media free to play an impartial, fair, and objective role in covering all candidates and political parties, or was there a selective approach to providing information on events where topics were chosen not because of their informational value but to portray a favoured party in a positive light and its opponents in a negative light?
- Was there any preferential treatment for or against a particular candidate or political party?
- Were the provisions, as set out by the national legal framework (including in relation to opinion polls and the silence period), respected by the media and political parties?
- Was there any prejudice in reporting based on ethnic, religious, or gender issues?

Candidates' right to impart information

- Were election contestants and political parties given equal opportunity to present their candidacies and platforms to the electorate through the media?
- Did election contestants and political parties have equal access, on a non-discriminatory basis, to the public/state media?
- Were election contestants and political parties treated fairly by state or public media?
- Were election contestants and political parties subjected to the same conditions (rates, time, etc.) for paid advertising?
- Were different kinds of TV programmes (such as news programmes, debates, free airtime, paid political advertisements, etc.) biased, and, if so, in whose favour?

The media's freedom of expression

- Did the media face any kind of censorship or obstruction by the authorities?
- Were journalists forced to adjust their comments or criticisms to what is considered acceptable by the authorities? Were they engaged in self-censorship?
- Were any media or journalists penalized or harassed in any way for broadcasting programmes or publishing articles merely because they were critical of the government, its policies, or ruling authorities?
- Did the media face any kind of interference with their editorial policy from political parties and public authorities?
- Did journalists adopt a certain point of view in return for money or other personal benefits?

4. GUIDELINES FOR MEDIA ANALYSIS: SENSITIVE ISSUES, BENCHMARKS, AND BEST PRACTICES

46. When assessing the role of the media in the electoral process, the media analyst needs to take into account a number of elements. Media analysis is much more than simply monitoring the content of media coverage of an election campaign. Such coverage depends on the legal framework, as well as the context in which the elections are taking place. To provide an adequate assessment of the role of the media during an election campaign, the media analyst will need to focus on three main areas:

- A study of the legal framework for the media;
- Observation of the media landscape and the relation between the media and the authorities;

- Monitoring of the media coverage of the election campaign.

47. The overall assessment should be based primarily on compliance with international standards and OSCE commitments. Here, the fundamental question is: were the rights to freedom of expression of voters, candidates, and the media respected during the electoral process? In addition to this fundamental benchmark, the assessment can be based on two other yardsticks:

- Compliance with national legislation, which in turn should be in accordance with international standards. The central questions to be answered are: was the legal framework in accordance with the political and legal commitments undertaken by the country? If so, were the national legal provisions respected?
- Comparison with previous elections held in the same country. In this case, the question is: compared to previous elections, did the situation related to freedom of expression and media coverage improve or get worse?

4.1 The Legal Framework, Election Regulations, and Election Administration

48. The most important aspect of regulating the media during elections is to find the right balance between respect for editorial independence and the need for certain rules to guarantee fairness by the media. Voluntary measures adopted by media professionals themselves, in particular in the form of codes of conduct or internal guidelines on good practice for responsible and fair coverage of electoral campaigns, are useful complements to state legislation or rules.

49. The legal and electoral background is the result of a variety of national traditions and practices. No universal model could produce the same results in different contexts. However, there are some basic principles that should inform the set of rules, practices, and behaviours for the legal framework and election regulation.

	Guidelines
Consistency of the Legal Framework	The legal framework regulating the media and the campaign during the election process should be consistent with the principles set forth by international law in the field of freedom of expression. If there is inconsistency, the legal framework should be reviewed and brought into line with international standards.
Media Regulation	The norms regulating the media during an election campaign should be clearly stated and should leave no room for manipulation or misinterpretation. Regulation should be aimed primarily at protecting voters' and candidates' right to freedom of expression. Any limitations on media coverage should be imposed only for this purpose and should be proportionate to the objectives sought. Areas of regulation may include elements that can unduly affect voters such as the dissemination of opinion polls, silence periods, hate speech, unequal access, and unfair treatment. Regulations should not be overly restrictive, and they should not unnecessarily impede media in their reporting and news coverage. During the drafting process, party and media representatives should be consulted in order to produce a set of rules based on the consensus of all the actors involved. Also, a system of self-regulation may be more advisable when conditions facilitate responsible and mature journalistic coverage.

Supervisory Body	The body regulating media coverage during elections should be independent, credible, and legitimate for all competing political forces. The appointment of its members cannot be under the exclusive control of the government and should comply with the principles regulating the appointment and the activity of the overall election administration. These principles include the need for: • Members to be suitably qualified and impartial; • Appointment procedures to be transparent; • Members to behave independently and impartially; • The public (including domestic and international observers) to have access to documents and decisions; • Members to be protected against arbitrary removal. The body entitled to supervise media coverage may be: • A self-regulatory body, such as the voluntary press councils in many states; • A permanent media regulatory body. This body can work autonomously or in a joint effort with the election administration; • A body specifically created for the election period, the task of which is to regulate and supervise media coverage only during the election campaign; • The main election administration body, such as the central election commission. The implementing body should have the experience, facilities, know-how, and mandate to monitor respect of the rules, investigate alleged violations, and impose effective remedies when violations take place.
Complaints	The implementing body should act upon candidates' and parties' complaints or whenever it records a violation, regardless of whether it has received any complaints. Procedures should be established to receive and act on complaints from candidates and political parties about unfair or unlawful media coverage. These procedures should be timely, clear, and accessible in order to give complainants a prompt remedy. Sanctions imposed by the supervisory body should be commensurate with the gravity of the offence committed by the media outlet. These should not include imprisonment or any measure that could prevent the media from carrying out their activities or encourage self-censorship among journalists.
Appeals	The media or complainants should have the right to contest decisions of the implementing body through a timely, accessible, and prompt judicial appeal mechanism.

4.2 Media Landscape and the Role of the Authorities

50. Within the electoral process, the state, and particularly the government, has a dual responsibility:

- Not to interfere unduly in the activities of the media and not to impede journalists in their functions; and
- To guarantee pluralism and uphold the right to freedom of the media.

51. Parties and candidates should also comply with certain fundamental duties in order to respect the freedom of the media. They should not interfere in the editorial policy of independent and public media by any direct or indirect means of pressure. They should respect the laws regulating the campaign and the media, including those provisions related to silence periods.

4.3 Media Coverage

A. Pluralism and regulation

52. A persistent problem during an election campaign is how far the media should be regulated in their coverage of candidates and parties. Media coverage of elections involves diverse and complex issues that can be handled both by regulation or self-regulation, or even left unregulated.

53. One issue that needs to be addressed is whether external regulation or self-regulation is required. Journalists do not usually favour any kind of external restrictions or impositions limiting their editorial freedom. On the other hand, the autonomy of the media system may not be sufficiently established as to be able to safeguard journalists and editors from the pressures and influence of the political authorities. In such cases, external regulation may guarantee the rights of voters and candidates to receive and impart information.

B. The advantage of the incumbent

54. Being part of the government means more attention from the media because of their need to cover the activities of the government, which may include official events, meetings, and the implementation of policies. Events can be genuine and relevant (such as national celebrations or anniversaries), genuine but marginal (such as the opening of public buildings), and pseudo-events (occasions created or managed by the government with the aim of getting better or wider media coverage). The government is also the main policy maker, and coverage is necessary to keep the public informed.

55. Members of the executive should act in the interest of the whole nation, but, on the other hand, they regularly represent a political party. This dual identity becomes particularly problematic during an election campaign in relation to two rights:

- The right of equal opportunity to access for candidates, a right that has to be balanced with the freedom and obligation of the media to cover government activities;
- The right to equal treatment for candidates. News related to the incumbent government may sometimes be framed in a positive light because of the kind of events covered (for example, official meetings, international summits, etc.).

4.4 The Regulation of Media Coverage during Elections

56. A further problem concerning the regulation of media coverage relates to its objectives. What kinds of programmes should be regulated? According to which criteria? The main areas of concern are free access, paid political advertising, news and current-affairs coverage, candidate debates, and voter education.

57. The following outline presents basic guidelines that should be taken into account when

observing the media coverage of an election campaign.

	General Obligations
Public Media	• They should provide parties and candidates in elections with equal access and fair treatment. Coverage must follow criteria of balanced, pluralistic, and impartial reporting; • They should comply with the provisions for election coverage as set by national legislation; • Public media should adhere to journalistic ethics and professional standards.
Private Electronic Media	• They should comply with the provisions for election coverage as set by national legislation; • Private broadcasters should adhere to journalistic ethics and professional standards.
Private Print Media	• The press should comply with the provisions for election coverage as set by national legislation and to journalistic ethics and professional standards. Any regulations on media coverage of elections should not interfere with the editorial independence of newspapers and magazines or with their right to express a political preference.

News coverage

58. According to para. 7.8 of the OSCE Copenhagen Document, the media should cover political parties and candidates in an unbiased manner. Overall fairness and impartiality are of particular importance in news, current-affairs, or discussion programmes given that people may form their voting intentions on the basis of such programmes. In their election newscasts, the media should adopt a balanced and impartial attitude. When offering broadcast time, the media should not discriminate for or against any of the candidates or political parties.

	News Coverage High Level of Editorial Control of the Media
Public Media	• The public/state media have an obligation to produce fair, objective, and balanced coverage of current events and election-related news. This obligation may be imposed either by self-regulation or by law; • The right to report is a fundamental aspect of journalistic news-making. The main discussion related to news is about whether news coverage in the public media should be strictly regulated, regulated only in relation to election coverage, or not regulated at all. In countries where freedom of expression has a stable tradition, political actors usually trust the system, and where there is a well-established practice of self-regulation, no other external provision is required. In countries where there is a lack of confidence among political parties, journalists, and institutions, stricter regulation may be necessary in order to protect public media from undue interference; • Many approaches can be used to ensure a diversity of voices: opinions of the government or the majority party should be counterbalanced by the opinion of the opposition; coverage of public events or statements made by the ruling parties on issues of public interest should be counterbalanced by coverage of the opposition parties' views, and vice versa. Comments – either reported by the presenter or made by external experts – should be clearly distinguished from facts, and they should reflect a variety of views.

Private Electronic Media	• The main issue with respect to private broadcasters is related to the balance between their nature as a commercial enterprise and their use of national public airwaves, which creates certain obligations in terms of providing a public service. In some countries, the allocation of a licence carries a certain level of public obligation; • From a theoretical point of view, the private media as a whole should guarantee pluralism of information, views, ideas, and opinions. Therefore, several independent media, with diversified editorial lines, can serve the purpose of producing a pluralistic system of information and access (external pluralism); • Whatever degree of editorial freedom private broadcasters enjoy, journalists should adhere to professional standards of coverage, as well as to professional ethics.
Private Print Media	• Private print media are not bound to specific election regulations concerning the allocation of space among political forces. However, journalists should adhere to professional standards of coverage, as well as to professional ethics.

Current-affairs and political-information programmes

59. Discussion programmes, like interviews or debates, supplement the normal news coverage of elections and are important because they enable the public to make direct comparisons between candidates. These types of programmes should be organized in a fair manner. Participants representing various political options should be treated equally and be able to freely present their views and platforms. However, the decision on how such fairness should be achieved (for instance, deciding the format, the number of participants, the length, etc.) should be left to the initiative of the broadcasting organization itself.

Free airtime/space

60. It is a common practice in many countries for the public-service broadcast media to offer free airtime for political candidates or parties to communicate their messages to the electorate. It is considered to be a direct form of communication between politicians and voters, without any intermediary role by the media. One of the main advantages of giving free airtime is to allow smaller parties or minor candidates to have an opportunity to deliver their electoral messages, as they otherwise do not get significant coverage by the media.

	Free Airtime/Space
Public Media	• Parties and candidates should be provided with direct access to the public media free of charge. No registered contesting parties or candidates should be excluded from receiving free airtime. The amount of time allotted has to be enough to allow candidates to effectively communicate and illustrate their platforms to the public; • The allocation of time can be on an equal basis or on a proportional basis according to the specific context in which the elections are taking place. When the number of contesting parties is limited, strict equality may be applicable; • When the number of contesting parties and candidates is high, a proportional formula may be adopted. The criteria for defining proportions can be based on a number of yardsticks: votes obtained by parties in the same kind of past elections, the number of seats in parliament, a threshold based on the number of candidacies filed in a minimum of constituencies; • Direct access should be broadcast/published when it is likely to

	reach the widest possible audience. Direct access also has to be made available on a non-discriminatory basis. Therefore, it is not acceptable to broadcast the messages of some candidates only late at night or early in the morning while other candidates are provided slots during prime time; • The process for the allocation of free airtime needs to be fair and transparent. The order of appearance should guarantee non-discrimination against any of the parties; • An independent body that is able to effectively and promptly remedy any violations should monitor compliance with provisions regulating the allocation of free airtime.
Private Electronic Media	• Private electronic media are not usually obliged to allot free airtime to election contestants. However, when they decide to offer airtime or they are obliged by law to do so, they should comply with the same principles as those regulating the public broadcaster.

Paid advertising

61. Paid political advertising provides another opportunity for all political parties or candidates to disseminate their messages through the media. While voters undoubtedly need as much information about contestants as possible to make an informed choice, paid advertising may give an unfair advantage to those parties or candidates who can afford to purchase more airtime or space. Although paid political advertising is widely accepted in print media, many states do not allow it in the broadcast media.

	Paid Advertising
Public Media Private Electronic Media	If paid advertising is permitted, it should comply with some basic rules: • It should be guaranteed on an equal basis to all contestants by offering consistent and equivalent rates; • Rates should be equitable for the requested time period within the media schedule; • Media should identify in a clear way paid airtime or party-sponsored slots in order to allow voters to be aware of the nature of the programme. Limits may be imposed on the quantity of paid advertising parties are entitled to purchase, as may limits on the amount of airtime media are allowed to broadcast daily. Another way to regulate paid political advertising is to impose limits on campaign expenditures of political parties and candidates. In some cases, the state, to consolidate the principle of equal opportunity, may allow paid advertising and decide to partially finance it.
Private Print Media	• The issue of paid advertising is not so problematic for print media. Nevertheless, the press should follow the principle of equal opportunity: paid advertising must be guaranteed on an equal basis to all contestants by offering consistent and equivalent rates. Print media should identify material that has been paid for in a clear manner. Limits may be imposed on the quantity of paid advertising parties are entitled to purchase, as may limits on the number of paid pages the media can publish daily.

Voter education

62. Voter-education programmes, whether commissioned by an election commission, public

broadcaster, or other organization, should always be impartial and accurate to inform voters about the elections. These programmes should always be clearly separated from any partisan messages.

Opinion polls

63. It is difficult to measure the actual impact of opinion polls on the results of an election. In order to avoid undue influence on voters, however, the media should offer the public adequate information to make a judgement on the value of opinion polls: the name of the party or organization that commissioned the poll, the name and methodology employed by the pollster, the sample and margin of error, and the date the poll was conducted. To avoid possible manipulation and to allow the public to have some period of reflection, some countries have provisions forbidding the dissemination of opinion polls at least one day before an election, or exit polls and opinion polls during the hours of polling on election day.

The silence period

64. The silence period, or so-called day of reflection, is a short period of time (usually a day) preceding the elections to allow voters to absorb and digest all the information received during the electoral campaign and to make a choice without pressure. The dissemination of any partisan electoral messages during this short period is prohibited.

5. CONDUCTING MEDIA ANALYSIS

65. This chapter provides an overview of the methodology commonly employed by media analysts during ODIHR election observation missions. It should not be seen as an exhaustive manual that deals with every aspect of setting up and running a media-monitoring operation; rather, it provides an explanation of the most important aspects of that methodology for those readers who are interested in this aspect of an election mission's work.

5.1 Assessing the Role of the Media during an Election

66. In order to produce a reliable and accurate assessment of the performance of the media during an election, the media analyst will have to answer many of the questions outlined earlier in Chapter 3. To do that, the work of the media analyst can be divided into four main tasks:

- Studying the legal framework;
- Observing the media landscape;
- Monitoring media coverage of the election campaign; and
- Monitoring media-related complaints and violations of freedom of expression.

5.1.1 Studying the Legal Framework

67. In order to understand the legal framework, the media analyst should study the following documents:

- The constitution;
- Media laws;
- Other laws and provisions within the civil and criminal codes that are related to the media;
- The electoral law or code;
- Rules and regulations on media coverage issued by the election administration;
- Rules and regulations issued by media regulatory bodies;
- Self-regulation instructions issued by associations of journalists or similar organizations.

68. The legal analysis should be guided by two objectives:

- To determine the degree to which the legislative framework is in compliance with international standards;
- To determine how far the overall body of laws and regulations on the media are coherent and internally consistent.

69. In conjunction with the legal analyst, the media analyst should produce a general assessment of the legal framework regulating the media. Whenever EOM experts identify legal inconsistencies, they should develop a set of recommendations in order to encourage improvements.

70. While a supreme law such as a constitution should embody international commitments on freedom of expression, subsidiary rules and regulations may vary from country to country. Each country has the right to decide the degree of regulation it wants to impose on the media. However, the rules defining the obligations of the media, both during an election campaign and during the non-election period, should be consistent with the principles of freedom of the media. The media analyst has to evaluate such provisions and determine how well they were respected.

71. A detailed familiarity with the norms relating to the media and elections in a country is also necessary to assess whether media outlets and political actors respect these provisions. The overall process of observation should facilitate the gathering of evidence of any infringements of the law. The media analyst should keep records of all the complaints filed by the media or by political actors with regard to freedom of expression and access to the media. Any cases that arise should be investigated.

5.1.2 Observing the Media Landscape

72. In order to assess the relationship between the media and the political system during an election campaign, the media analyst must analyse the media landscape. To make sure that this is not misinterpreted, the media analyst should take a number of steps to understand the historical, political, social, and cultural environment of the country where the observation is being undertaken.

73. The media analyst could acquire a deeper knowledge of the media landscape and its context through meetings with:

- Institutional actors, e.g., representatives of the ministry of information and/or telecommunications, state committees on the press, bodies in charge of media-related issues within the election commission, special committees on media, broadcasting councils, etc.;
- Representatives and associations of print and electronic media, e.g., directors, editors, prominent journalists, representatives of news agencies, publishing and printing houses, unions of journalists, etc.;
- National and international associations (governmental or non-governmental) operating in the media sector, including all the active groups permanently or temporarily based in the host country.

74. The media analyst should also take into account contextual data such as the following:

- Number of electronic and print media operating in the country;
- Types of the public/state media, either electronic or print;

- Number of licences issued by the state at the national and local level;
- Number of unlicensed stations operating in the country, if any;
- The geographic coverage of existing media;
- The audience and readership ratings of the media, when institutional or professional surveys are available;
- Hours of broadcasting or frequencies of publication for every media outlet;
- Size of media companies;
- The kind of media, targeted audiences, and their potential impact on the public;
- Number of media dedicated to specific ethnic/linguistic minorities living in the country;
- Economic conditions of the media, the general market, the existence of specific subsidies or tax breaks;
- The structure and transparency of ownership (concentration versus diversity);
- Number and ownership of news agencies and printing houses;
- Structure and control of the distribution system for print media;
- Licensing requirements for broadcast media;
- Any media outlets owned or controlled by political actors;
- The extent of new media and Internet access in the country.

75. Some of this information can be obtained by reviewing official documents and reports on the media environment produced by universities, associations of journalists, international organizations, local or international NGOs, or other active groups in the field. Meetings with representatives of the media and other experts can reveal additional information.

76. Interviews with journalists and other media professionals should also focus on topics related to the campaign, such as the following:

- Journalists' opinions on the regulations, if any, concerning media coverage during the election;
- Whether journalists have received specific training in election coverage;
- How journalists are planning to cover election events;
- The kind of programmes electronic media plan to broadcast to cover the elections;
- When rules allow it, the basis on which the electronic media decide to provide airtime to candidates;
- What the rules regulating paid advertising are and what rates are applied;
- Whether the media have issued any internal codes of conduct or instructions for journalists to cover election events;
- Whether the media have received any complaints from political parties or candidates for the way they are covering the campaign.

77. Field research and meetings with journalists, media experts, national and international organizations working on media issues, and others allow the media analyst to make a general assessment of the level of professionalism among journalists. If shortcomings in terms of professional capacity emerge during the observation period, the media analyst should encourage and recommend improvements.

5.1.3 Monitoring Media Coverage of the Election Campaign

Sampling

78. Whenever possible, the entire campaign period should be monitored in order to observe the implementation of the rules regulating access and coverage of candidates and parties throughout the whole electoral process.

79. Decisions must be made as to which TV channels and radio stations will be monitored, which newspapers, and which period of time for the electronic media (just prime time, 24 hours, etc.). While these decisions will be affected by resource limitations, the sample should provide reliable information on the general trends of media coverage.

80. The media analyst should study the media environment before choosing the outlets that will be monitored. This will include looking at:

- The number and variety of media outlets operating in the country;
- Ownership (public/state or private) of media outlets;
- Geographical range (national or local level) of media outlets;
- Audience/readership ratings of media outlets;
- Hours of broadcasting or frequency of publication of media outlets;
- Kind of media, targeted audiences, and their estimated impact on the public and the political elite;
- Number of media specifically targeting ethnic/linguistic minorities living in the country.

81. This information will allow the media analyst to make a choice regarding:

- **The number of monitored media:** This is the first decision the media analyst needs to make. He/she should decide in advance how many channels and newspapers will be observed. In order to have comparable data, once the sample has been set, it is important to stick to it and not to modify it during the course of the observation period;
- **The time band of observation of the electronic media:** The basic period to be monitored for TV and radio stations is during prime time (18:00-24:00), when audiences are normally largest. The selection of the time slots to be monitored may vary from country to country according to the specific programme schedules and the rules regulating the campaign in the media. Whatever time band is chosen, however, the observation should not be limited to news programmes but should include other programmes broadcast in that time band. Debates, information programmes, free airtime, and entertainment shows may have a role in shaping the opinions of the electorate about candidates and parties. Therefore, it is important to monitor how the time is allocated among contestants even in these kinds of programmes;
- **The type of media outlets that will be monitored:** Criteria for choosing media outlets should take into account their ownership. Publicly owned media have stronger obligations than private ones, as they are financed with public funds and therefore they should not be partisan in their coverage. Observing state or public media is therefore a priority. The media analyst should also include in the sample the main private electronic media, which should be chosen on the basis of their geographical range, audience, and potential impact on voters. With regard to print media, all the most important national dailies should be monitored, chosen on the basis of their geographical range, readership, and potential impact on voters. In those localities where ethnic or cultural diversity is reflected in different targeted media, it is advisable to monitor minor media outlets that have a considerable penetration and impact on minority groups. This might also be the case for some newspapers that target political or social elites and have small print runs but that are influential in the broader media community.

Quantitative analysis

82. Monitoring media coverage of an election campaign requires the collection of a number of quantifiable elements of media output, such as:

- The amount of time devoted to particular politicians;
- The length of parties' election broadcasts;

- The number of times a particular word was used to describe a particular politician;
- The number of women candidates quoted;
- The number of times a particular campaign issue was reported.

83. Other aspects of the media campaign coverage can also be usefully measured:

- Number of mentions received by each political actor (such as a candidate or other politician);
- Length of time or amount of space given to each political actor;
- Positive, negative, or neutral references to each actor;
- Time or space given to direct speech or interviews with each political actor;
- References to different topics;
- Order of placement of news items on different candidates, parties, or topics;
- Gender balance of media coverage of candidates.

84. With slight modifications to the basic methodology, it would also be possible to measure:

- Geographical origins of different monitored items;
- Number and identity of different sources within each monitored item.

85. All these different measures can be combined to allow more detailed analysis. Hence, it will be possible to address a wide variety of issues from a quantitative point of view. This might include:

- How often a particular candidate is quoted on a particular topic;
- How often a woman candidate appears in the lead item of a news bulletin;
- How many and which sources are used for stories featuring different parties or candidates.

86. It is important to remember that this quantitative data serves a larger purpose; these elements are not counted simply because they can be counted, but because an analysis of the data, within the context of the media landscape and the political situation surrounding a particular campaign, can help the media answer many of the questions set out in Chapter 3 about the role of the media in the electoral process, and it gives the media analyst the information needed to assess the media's performance during the campaign.

87. But this sort of analysis clearly has its limits. There may be a valid explanation for why one candidate is given more time than another. The quantitative measure is objective, but alone it may not be wholly indicative of bias. For example, if we count the number of times women candidates are quoted, will this tell us whether the media have a gender bias? Not necessarily. If women's voices are under-reported, there are several possible explanations for this. It might be media bias, but it might equally be that parties are not giving their women candidates a prominent voice in the campaign. On the other hand, identifying that the incumbent president always appeared before the opposition candidate in a news bulletin would be a valid indication of imbalance on the part of the broadcaster.

88. Equally, measuring the allocation of time does not tell us how that time was used. Coverage may be positive, negative, or neutral in tone.

89. In addition to these findings, there are many other important aspects of media coverage of elections that should be monitored but that cannot be analysed quantitatively. Here are some examples:

- **Accuracy:** the quantitative measure of *tone* will show whether references to a party or candidate are positive, negative, or neutral. But this in itself will not show whether the media are reporting accurately. Persistently inaccurate reporting is one of the most serious deficiencies in campaign coverage and can only be identified through qualitative analysis. The media analyst can use a number of methods to do this. It will be particularly important to compare media coverage with the observations made by the rest of the election observation mission: this will be a way of testing the accuracy of media reporting of events that observers may themselves have attended. Another important method will be to compare coverage of the same events in different media. This will not in itself show which media are reporting inaccurately, but discrepancies will be a good indication of issues that need further investigation;
- **Omissions:** Distorted reporting often consists of a failure to cover important stories and issues. The media analyst will use similar methods to identify stories that have not been covered: comparison between different media outlets and reference to the rest of the EOM;
- **Hate speech:** Monitors will scrutinize how the media report inflammatory language in the election campaign. This requires a fine judgement that will have to be made with reference to the actual words spoken, the context, and the national law and ethical standards;
- **Misleading headlines and graphics:** Measuring the content of items will not always succeed in identifying one of the most common ways of misrepresenting parties or candidates in an election campaign. Headlines that are sensational or do not accurately reflect the content of a story can be far more influential than the story itself, however accurate that may be. Likewise, the juxtaposition of a story with unrelated visual material – photographs or video footage – can also be influential, both positively or negatively. Even ostensibly neutral graphics can be sensitive. In one monitored election, the logo of the state broadcaster's campaign news was almost identical to the symbol of the ruling party;
- **Ethical issues:** All of the above issues are, to some extent, related to the professional or ethical standards of journalism. Other issues may also arise that require comment from the mission. For example, there may appear to be a relationship between favourable campaign coverage and the placing of large amounts of advertising by a particular party or candidate. Or there may be a blurring of the distinction between fact and comment. Opinion-poll findings may be reported unprofessionally or at a time when they are prohibited by law. These, too, are qualitative issues that quantitative analysis will not detect.

Qualitative analysis

90. This kind of analysis aims to describe situations and phenomena for which quantitative analysis is not necessary but that are relevant for assessing the overall quality of the media coverage of the campaign.

91. Qualitative analysis of media coverage of the electoral process can involve different topics, the most common of which are:

- **The coverage of opinion polls:** Are they produced according to national provisions regulating the public dissemination of opinion polls? Is the sample used representative of the entire population? Are the questions formulated in an appropriate manner?
- **The coverage of exit polls for those countries where voting takes place in different time zones:** Does the coverage include the closure of all polling stations?
- **Voter education:** Is there any specific campaign for voter education? Does it provide voters with correct and clear information on their right to vote and voting procedures? Does it target different audiences, particularly the disadvantaged or groups that are

traditionally discriminated against? Is it focused on particular aspects or problems widespread in a specific country?

- **Electoral silence:** Do media outlets respect the provisions for the silence period (if set forth by a national regulation)? If not, what are the major violations? Who should be considered responsible for breaches of the law?
- **Episodes of hate speech and inflammatory language:** Is any media outlet disseminating hate speech? At what point in the campaign? Who were the targets?
- **Journalistic style:** Do journalists tend to mix opinions and facts when reporting? Do journalists try to provide the public with in-depth analysis and accurate information, or do they rather tend to report in a superficial and incomplete way?
- **Professional conduct of journalists:** Are journalists responsible for any clearly biased information or coverage, episodes of defamation, partisan declarations, or untruthful news?
- **News omissions:** Was any relevant piece of news omitted by the media observed?
- **Analysis of the formats used to cover the elections:** Are there any examples of innovative election coverage? Have satirical programmes or articles been produced? Have the media produced any programme or article in the language(s) of national minorities? Are they dealing with national-minorities issues? Have the media produced any programme or article dealing with gender issues?
- **Coverage of election administration:** Are the activities of the election commission being covered? Are sensitive issues related to the administration of the election being covered? Is the coverage promoting confidence in the institutions and the electoral process, or is it undermining their legitimacy?
- **The advantage of the incumbent government:** Have there been cases in which government officials are campaigning by taking advantage of their institutional functions? Are government officials using their institutional duties frequently enough to raise concern about their authenticity? Was any suspicious campaign of civic education launched by the government on the eve of the elections?
- **The agenda of media outlets:** What topics and stories are being covered by the main TV news? Is the public broadcaster covering stories favouring a specific party? Are private broadcasters setting an agenda favourable to a specific party?
- **Violations:** Have any of the provisions regulating media during the electoral period been violated?
- **Kind of election campaign through new media:** websites, e-mail list servers, text messages to mobile telephones, etc.

92. The media analyst should decide in advance what issues and events to observe. When this has been decided, he or she should draft a form to be distributed to all the media monitors and to be filled out by them on a regular basis. This procedure aims to produce structured and standardized observations and to avoid impressionistic approaches. In longer monitoring exercises, where a database is being used, it may be possible to record such qualitative observations in the database. While they have no statistical value, this will make it easier to search for monitors' analysis of particular issues.

93. Once forms have been completed by all the monitors, it is important to go through their observations and to discuss their findings with them. This is another procedure to avoid basing findings on mere impressions; the comparison of observations and discussion among monitors and with the media analyst serve as an indicator of the reliability of the survey and the consistency of results. Forms are to be filled in regularly. This discussion should be held whenever monitors deliver their observations.

5.1.4 Monitoring Media-Related Complaints and Violations of Freedom of Expression

94. The media analyst should keep records and obtain documentation of all relevant events

affecting freedom of expression, such as the following:

- Whether there are any impediments to the media's activities;
- Whether the media face any kind of direct or indirect censorship;
- Whether the media are under direct or indirect pressure from governing officials or political parties;
- Whether the state media are under pressure from the managing board regarding their editorial choices;
- Whether the private media are under pressure from owners regarding their editorial choices;
- Whether journalists have been or are being intimidated and whether the purpose of that intimidation is to obstruct their professional activities;
- Whether journalists have been detained/imprisoned;
- Whether lawsuits against the media and journalists have a sound legal basis;
- Whether the media receive hidden fees for favouring a party or candidate.

95. In the course of the electoral process, candidates, political parties, and media professionals who are the target of discrimination or violations of their rights might file complaints in order to receive redress. Keeping track of these complaints is important when assessing the confidence of political and media actors in the process.

96. The media analyst should, however, not interfere in this process. When complaints are addressed to the EOM, for example, instead of to the competent body, the media analyst should limit himself/herself to recording the complaint without intervening in the dispute, while also reminding the complainant of the officially established channels for registering complaints. On the other hand, when aware of a complaint, the media analyst should gather as much information about it as possible while remaining impartial. To obtain a comprehensive overview of the object of the dispute, the media analyst should meet all sides involved. The media analyst should work in close co-operation with the legal analyst, as well as with the election analyst.

97. Media-related complaints should be gathered in written form and archived. They should also be classified in a specially designed form (in hard copy or electronic version), verified, and followed up. The form should include relevant information such as:

- The date the complaint was filed;
- The name of the complainant;
- The name of the body or the person the complaint was filed against;
- The name of the body where the complaint was filed;
- The location of the body where the complaint was filed;
- The place the alleged wrongdoing occurred;
- The object of the complaint;
- The legal ground on which the complaint was filed;
- A short comment on the complaint on behalf of the media analyst or the observers reporting it;
- The date on which the competent body will hear the complaint.

6. PROCESSING AND ANALYSING DATA

6.1 Units of Context

98. Monitors work with particular sub-sections of the media that they are monitoring, known as units of context. These in turn are subdivided into recording units for the purpose of measuring variables. A unit of context is every uninterrupted portion of broadcasting or publishing dealing

with the same content. This means that it is possible to have rather long units of contexts (for example, an entire programme, like a talk show or a current-affairs programme) and some very short units of context (such as a single news story inside a news bulletin).

99. In practice, it will be easy to recognize the beginning and end of each unit of context. This will be marked either by the beginning or end of a programme or by the less formal, but equally recognizable, division between news items within a bulletin. Units of context in the print media will almost always correspond to a separate article. By convention, commercial slots do not interrupt a unit of context. However, an exception to this would be advertisements that include a relevant actor, i.e., a politician or candidate. These are regarded as units of context in themselves and are analysed separately.

6.2 Recording Units

100. A recording unit is the segment of a message that is devoted to one, and only one, relevant actor. In the same unit of context (for instance, a talk show), we have as many recording units as the number of segments of communication devoted to a different relevant actor. So, for example, each time a political candidate speaks during a talk show, this will be defined as a separate recording unit. In a news item, the recording unit will be each separate occasion that the candidate is referred to or quoted. The advantage of using small segments of text as recording units lies in the level of accuracy during the analysis phase. Every recording unit will be recorded separately and coded using the variables chosen in the research design.

6.3 Coding

101. The process of coding with variables is crucial. The codes assigned should be clear and unambiguous. The following variables are particularly important:

- **Definition of the relevant actors:** The concepts of politicians and candidates are clear. However, the media analyst should give the media monitors very clear instructions on how to translate the concept of *politician* into the variable *relevant actor*. Relevant actors are all those actors who are members of a party or the government. Before starting with data collection, it is important to get the list of candidates with their party affiliation from the national election administration, as well as the list of the members of the current government. The body of relevant actors may include:
 - All the members of parliament (one or two chambers, depending on the country);
 - All the members of the government (ministers and deputy ministers);
 - All the candidates running for election (based on the official list presented and approved by election authorities);
 - All the institutional actors (president, parliamentary speaker);
 - All the members of the local administration (mayors and representatives of local assemblies);
 - Members of political parties clearly defined as active politicians (for instance: a leader of a party not running for election, not a member of the government or institutions, not elected in local administrations, but still a member of a registered party in the country);
 - All registered political parties.
- **The definition of the variables describing the relevant actor:** The media analyst decides how many variables are to be used to describe relevant actors. Three kinds of information will always be considered in describing relevant actors in order to produce the necessary occurrences and statistics: political affiliation, candidacy, and gender. These variables allow the monitoring team to determine the distribution of

coverage among political parties or among the candidates running for election. They will also enable the production of data related to gender balance. It may be useful to add other variables. It may be of interest, for example, to know how frequently candidates from minority groups are reported or cited. This could be added to the list.

- One important decision is how to classify members of the government. Representatives of the government have a dual political role, affiliation and identity: they are usually members of a party but they are also representatives of the executive power. The media analyst should decide under which category the government officials should be labelled. The advantages that go with incumbency are well known. Therefore, it is important to be able to produce data on the coverage received by the incumbent government in order to assess whether or not it might have enjoyed a notable advantage.

6.4 Measurement System

102. The best measurement system, in terms of precision, uses seconds and square centimetres. If the monitoring team simply counts how many times an item occurs, without calculating the length of each item, this can lead to misleading results. The need to provide a precise picture of the distribution of coverage among parties and politicians means that time allocated should be measured for the electronic media and space for the press.

103. The variables that can be used to quantify the amount of coverage devoted to political actors can be summarized as follows:

- Time of attention – space of attention: a measure of the coverage political actors receive by the media monitored:
 - Total time is the measurement of the coverage given by TV and radio to a relevant actor;
 - Total space is the measurement of the overall coverage given by the print media to a relevant actor;
 - The time will be calculated by stopwatches or the clock of a video recorder and reported in seconds in the time column of the analysis form for TV/radio. The space will be calculated in square centimetres and reported in the space column of the analysis form for the press;
 - The indicators *direct-speech time* and *interview space* aid the measurement of political actors' direct access (in its various forms: interviews, statements, advertising, etc.) as provided by the media. Direct-speech time (DST) is the time when the relevant actor is directly quoted on TV and radio. Interview space (IS) is the space where the relevant actor is directly quoted in the press.

6.5 Quality of Coverage

104. Gathering information on the quantity of coverage devoted to different political actors does not provide a comprehensive picture of the pluralism displayed by media outlets. The public image of political parties, candidates, and leaders is shaped not only by the amount of time or space they are allotted, but also by the way they are portrayed. For this reason, media monitoring needs to use a general index for the quality of the coverage. The main problem arises because of the need to minimize the subjectivity of the judgement of the monitors when assessing the tone of the coverage (the problem of reliability). Tone can be difficult to measure because of its rather subjective nature. Training of national media monitors is very important to give them clear instructions on how to record this variable and what elements should be taken into account when assessing tone. Rules to codify tone must be clearly set, and unclear cases should be discussed.

105. Measurement of the quality of coverage involves a number of concepts that can be translated into variables:

- The explicit judgement of the journalist on the relevant actor;
- The framing of the coverage of the relevant actor. *Framing* represents the value of the news story within which the actor is covered, the context in which the actor is reported. The concept of framing is not related to the actual truth or falsehood of the context but on the light this context casts on the actor. The constant coverage of a political actor in problematic contexts (for example, episodes of violence, lawsuits for corruption, etc.) during an electoral campaign may indicate an intention to provide the public with a negative portrayal of that actor;
- The manipulative use of films, pictures, sounds;
- The choice of words when covering political actors or presenting news;
- Respect for basic professional standards of journalism when covering a news story.

106. The tone is measured on a scale that is usually based on either five values (very negative, negative, neutral, positive, very positive) or three values (positive, neutral, negative).

6.6 Weighting Cases

107. The media analyst is interested not only in checking how many times relevant actors appear, but also in observing how long they are present. For example, the media analyst needs to be able to say how much time or space Party 3 received rather than simply saying how many times it has been mentioned (frequency).

108. Therefore, the frequency needs to be weighted by the time. In addition, it can be useful to calculate the relative percentage of this measure, as the frequency in absolute values does not immediately facilitate a comparison of the level of coverage received by relevant actors.

109. The calculation of percentage values allows the media analyst to compare the distribution of time/space among the different groups.

Example

Political Affiliation	Time	% Time
Party 1	631	46.2%
Government	317	23.2%
Party 3	286	20.9%
Institutional	133	9.7%
Total	1,367	100%

110. In this way, the media analyst will be able to say that Party 1 has the largest share of coverage and got almost twice as much time as Party 3. The media analyst will use time/space and DST/IS as weights to analyse data in order to produce a report based on these two measures.

6.7 Interpreting Data

111. The interpretation of numeric data needs to be done carefully, taking into account not only what statistical tables show but also possible reasons for the values reported in those tables. The media analyst needs to describe a phenomenon, in this case media performance, but he or she also needs to be able to explain it. There is no general model for interpreting data. What follows are some simple indications that can improve the reading of data and make it easier to analyse it:

- When observing data, it is important to read absolute and relative values. Both provide very important information. Using only percentages can sometimes be misleading. For instance, let us say that there are three parties: Party A received five seconds of coverage, Party B got two hours, and Party C received four hours. If we observe that the 70 per cent of the time devoted to Party A was negative, without considering that the total amount of time devoted to this party was very small compared to other parties, we risk overestimating the importance of this data;
- When the media analyst finds values that appear odd, he or she should find an explanation for them. They might be produced by a mistake in the input phase or in the data-recording phase or they might be correct and the media analyst should be able to explain the anomaly;
- Using sets of data that are large enough to be significant. The basic reporting period is the entire campaign, although it is likely that the media analyst will also be required to produce an interim report. Beware of drawing unwarranted conclusions from data covering short periods of time;
- When analysing statistics, only compare like with like. If, for example, the media analyst tries to compare the output of a daily publication with that of a weekly, they will get strange and misleading results. A weekly will have far fewer items, of course, but these items may also be very different in their nature. A long feature story, for example, may contain many more sources than a short news item. This does not necessarily make it a better story. The analyst should take care not to make misleading comparisons that may be used to support tendentious arguments;
- It is important to evaluate data by taking into account contextual information, too: the legal norms regulating the media during the election – both national laws and international standards – provide a fundamental framework for interpreting findings. The party system, the political context, and the relative importance and status of the media outlet monitored constitute other elements that have to be considered when drafting conclusions;
- Remember that the figures in the worksheet or database are descriptive, not inferential, i.e., they describe only the items monitored. It is not possible to use them to infer what might have been contained in other media that were not monitored. Hence, the media analyst should always take care not to make claims for statistical findings that are not warranted;
- Qualitative findings provide useful explanations for statistical data. The reasons for a certain trend, a specific value found, or a meaningful variation of data can often be explained by using the structured qualitative analysis undertaken during the monitoring;
- A related point is that quantitative data should always be analysed with reference to what was happening in the campaign at the time. The media analyst should constantly keep in mind events and factors in the outside world that may explain the data, especially if there are surprising results. Over shorter periods, one major event or news story can skew the data significantly;
- Media-monitoring findings do not tell you what happened; they only tell you what was in the media. The data can be used to compare the output of different media organizations. This data does not, in itself, indicate whether or not the media were reporting accurately. To determine that, the media analyst will have to compare data about the media with data about the incidents being reported. These might include statistics on political violence, numbers of rallies for different parties, etc.