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Gender Analysis of the First Media Strategy with Brief Reference to the Situation in the Media Sector

Montenegro

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WOMEN'S RIGHTS CENTER
CENTAR ZA ŽENSKA PRAVA



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GENDER ANALYSIS OF THE FIRST MEDIA STRATEGY WITH BRIEF REFERENCE TO THE SITUATION IN THE MEDIA SECTOR

Podgorica, September 2023

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BRIEF ON POLITICAL CONTEXT

At the beginning of 2021, during the mandate of the 42nd Government, the process of strategic regulation of media policy was launched in Montenegro for the first time. Starting from participation in the public debate, through addressing the new leadership of the relevant ministry, which also undertook the obligation to finalize the strategy, and up to the opinions of international experts, the Women's Rights Center carried out intensive advocacy activities in order to horizontally integrate the gender perspective of media policy into the strategic document in the making. We had strong foundations for our advocacy goal in the Law on Gender Equality (Articles 3 and 14), the National Gender Equality Strategy 2021-2025, the Gender Equality Index for Montenegro for 2019, important research by international and local organizations on the topic of gender equality and media, but also in European strategic documents and instruments, of which we single out the EU Action Plan for achieving gender equality (GAP III) and the Resolution of the European Parliament on gender equality in the media sector.

The mentioned documents prescribe minimum standards for women's participation in the media sector, their representation in media content, gender sensitivity of programs, promotion of non-stereotypical content, ways of reporting on gender-specific topics, and so on.

As referenced above, the participation of women in the media sector was addressed through the first Gender Equality Index for Montenegro from 2019, within the domain of power and the sub-domain of social power. The subdomain of social power includes indicators for measuring the share of men and women in positions where decisions are made, in funding of the organizations conducting research, in media and sports. Our analysis indicated that certain shift was made when it comes to the management body of the national broadcaster, where the share of women rose from 11.1% (when measured through the Index in 2019) to 20% (see the table below). Gender analysis of the management structure in other institutions directly responsible for the media sector, such as the Ministry of Culture and Media and the Media Directorate, the Agency for Electronic Media, the Agency for Electronic Communications and Postal Services, Radio and Television of Montenegro, the Commission for Monitoring the Actions of Competent Authorities in Cases of Threats of Violence against Journalists, Murders of Journalists and Attacks on Media Property and the Film Center, are missing from the Index. In order to have a more complete overview of the situation in the sector, the Women's Rights Center collected open and accessible data and compiled an overview of gender structure of employees in institutions in the media sector with an emphasis on management bodies.

According to the results obtained, there are still no women in the Council of the Agency for Electronic Communications and Postal Activities, only 33% are in the Council of the Agency for Electronic Media and the Council of RTCG, while they are dominantly underrepresented in the Commission for Monitoring the Actions of Competent Authorities in Cases of Threats of Violence against Journalists, Murders of Journalists and Attacks on Media Property and the Broadcasting Center. Out of a total of seven institutions, women are at the head of three or 42%. Women make up a little over half of the management structure in the Ministry of Culture and Media and the dominant majority in the Agency for Electronic Media and the Film Center.

Governing Boards	Gender of the Head of the Board	Number of women in the Board	%
Ministry of Culture and Media	F	4 od 7	57.14%

Agency for Electronic Communications - Council	M	2 od 6	33.33%
Agency for Electronic Communications Management team	F	4 do 5	80.00%
Agency for Electronic Communications and Postal Services - Management team	M	4 od 8	50.00%
Agency for Electronic Communications and Postal Services - Council	M	0	0%
RTCG - Management team	M	3 od 7	42.86%
RTCG - Council	M	3 od 9	33.33%
Commission for Monitoring the Actions of Competent	M	3 od 13	23.08%

Authorities in Cases of Threats of Violence against Journalists, Murders of Journalists and Attacks on Media Property and the Broadcasting Center			
Broadcasting Center Management team	M	3 od 12	25.00%
Broadcasting Center Board of Directors	F	1 od 5	20.00%
Film Center Management team	F	7 od 8	87.50%
Film Center Council	F	2 od 5	40.00%

According to data from 2019, obtained through the research on the position of female journalists in the media sector¹, there is 50 percent women in the positions of directors/general/executive directors in 14 monitored media. The positions of chief and responsible editors/directors of the program are represented by 51.5 percent of women, while in the lowest decision-making positions - editorial editors - women make 60.8 percent².

¹ Link: <https://dpncg.me/images/dokumenta/POLOZAINOVINARKIUCRNOGORSKIMMEDIJIMA.pdf>

² Op.cit. str. 4

Our analysis of a total of 100 public broadcasters and operators from the register of the Electronic Media Agency shows that 33 women are in the director's position, compared to 64 men on director's positions. In one case both a woman and a man are in this position, while there is no information for 2 broadcasters.

Hence, the position of women in the media sector has improved, with a couple of negative exceptions, so we can conclude that there is a solid gender balance in media decision-making positions. There is also the majority of female journalists who manage the media or work³ in the media. However, the assessment of the financial aspect of the media i.e. salaries of the media professionals, significantly change the perspective of seemingly improved position of women. For example, the data of the Media Union of Montenegro 2021, showed that every fourth journalist in Montenegro receives between 500 and 600 euros of net salary, which is below the average net salary in the country (757 euro in March 2023). Just over 12 percent of surveyed media professionals said that their earnings were between 600 and 700 euros. Slightly more than 18 percent of respondents earn more than 700 euros, 23 percent of journalists earn between 400 and 500 euros, and 15 percent of journalists in Montenegro earn less than 400 euros⁴. Thus, as many as 38 percent of journalists in Montenegro receive a below-average salary, while 44 percent of respondents stated that, in addition to journalism, they also do other paid work. To conclude, better women's representation in the media is interrelated with the lower income of media professionals.

Furthermore, it seems that the underpayment of the media profession, the principles of hierarchical organization and the career race that hardly allow absence from work for private reasons, make this sector fundamentally unstimulating for women.⁵ The underpayment of the profession requires additional work engagement, while undefined working hours with a so-called working on a "daily lane" and organizational culture, do not contribute to achieving a work life balance. These are the conclusions of the 2021 research on the position of female journalists in the Montenegrin media ⁶.

It would be more than useful that the Media Strategy include these findings and address them on a strategic level.

³ Source: <http://monstat.org/eng/novosti.php?id=3678>

⁴ Socio-economic position of media workers, Media Union of Montenegro, 2021. Link: <https://sindikatomedija.me/publikacije/11655/>

⁵ Factors such as doing housework, taking care of children, absence from work due to pregnancy or child's illness are recognized as burdensome with a negative impact on employment and reaching management positions and editorial positions. More in Position of female journalists in the media in Montenegro, Duška Pejović, op.cit. More at linku: <https://mediji.me/mediaandminorities-single/59>

⁶Op.cit.

SUGGESTIONS, COMMENTS AND PROPOSALS of WOMEN'S RIGHTS CENTER

submitted to the Ministry of Culture and Media on

**Draft proposal on Media Strategy of Montenegro 2023-2027 with Action Plan for
2023 and 2024**

RECOMMENDATION 1: The strategy does not fully contribute to the development of gender-responsive policies, since the level of its gender mainstreaming is at a low level

Explanation :

The National Strategy for Gender Equality (NSGE) 2021-2025 clearly indicates the provisions of the Law on Gender Equality according to which the state authorities, among other actors, are obliged to assess and evaluate the impact of their decisions and activities on the position of women and men, in all phases of creation and implementation of policies. Also, majority of sectorial policies do not contain goals, activities, indicators and budget that should enable empowerment of women, especially vulnerable categories within this grouping⁷.

In order to reach the strategic goal of the NSGE 2021-2025, to “achieve a higher level of gender equality by 2025”, and in order to more effectively implement Operational Goal 1⁸, the proposed draft of the Media Strategy needs to be analyzed in line with the indicators that are part of the *Instrument for gender equality assessment in strategies and laws*, which the Government prepared at the end of last year.

In that sense it is especially important to consider the following criteria:

1. The composition of the working group should be gender-balanced:

It is necessary that the Strategy contains the names of members of the working group who participated in its development. In the Strategy, it is generally stated that the WG is composed of 19 representatives of state bodies, the Media Union and the non-

⁷ National Strategy for Gender Equality of Montenegro 2021-2025 with the Action Plan 2021-2022., Government of Montenegro, Ministry of Justice, Human and Minority Rights in cooperation with the OSCE Mission, 2021. The document is available at : <https://www.gov.me/cyr/dokumenta/41e3ee6a-757a-4684-9763-9fee5e933afd>

⁸ It refers to improvement of the existing normative framework for the implementation of gender mainstream policy and protection against discrimination based on sex and gender, and measures 1.1. on the obligation to standardize procedures for the implementation of gender mainstream public policies.

governmental sector. There is no information on whether the group included representatives of non-governmental organizations that deal with gender equality.

2. Take the gender perspective into account even in the preparatory phase of creation of the Strategy:

In relation to the aforementioned, it is unclear which experts in the field of gender equality were consulted and whether they were consulted at all.

3. The situation analysis should be based on sex disaggregated data:

When citing data from various researches that are mentioned in the text of the strategy, it is necessary to pay an extra attention to the inclusion of basic information about the authors of the certain cited research, and to provide more precise information about where they were published (and in accordance with the rules of citation of scientific research works). This particularly applies to the SITUATION ANALYSIS chapter, but also to the entire document. Overall, the absence of references in the quoted parts of the text is noted. However, the biggest drawback of the Strategy in this part is the absence of analysis that includes sex disaggregated data, wherever possible. For example, the usage of sex disaggregated data in the section on SOCIAL AND ECONOMIC POSITION OF JOURNALISTS, about the number of men and women who complete journalism studies, and the number of men and women employed in the Montenegrin media, up to the analysis of the positions they cover and the responsibilities related to the job description, would be particularly useful for acquiring an objective picture of the media sector in Montenegro, and for presenting baseline values that could have been targeted by the Action Plan. When it comes to statistical presentation of the salary of journalists in general (p. 16), it is necessary to add a table where the data would be classified by gender. Such classification would be helpful in identifying possible "glass ceilings" in the media sector and to compare to the European level, where a noticeable trend of a lower percentage of women in management positions and decision-making positions occurred. Also, it would help to analyze the presence of gender gap in earnings of the media sector, since in Montenegro there is a 14% overall gender gap in earnings. The disproportionate representation of women in the news outlets, particularly in the fields of politics, economics, finance, and sports, is another topic that should be addressed by the Strategy. A lack of sex disaggregated data can indicate insufficient gender awareness and research capacities of the Agency for Electronic Media in the Monitoring Sector, or an insufficiently elaborated methodology used by the Directorate for Statistics, that the Strategy should address, as well.

Media organizations should also establish databases of female experts in various fields (especially those with a lower representation of women). Moreover, all future data on media content should be classified by gender. The strategy at this moment should

foresee such activities.

In the chapter entitled EUROPEAN ASPECT OF MEDIA POLICY IN MONTENEGRO, in addition to key reports of the EC on the Montenegro Country Report, it is necessary to refer to the EP Resolution on gender equality in the media sector in the EU (2017/2210(INI))⁹ which, even though not binding for Montenegro, offers a wide range of indicators aiming to achieve a greater degree of gender equality in the media policy of the member states.

Furthermore, available sex disaggregated data in education, employment or participation in decision-making, could have also enriched the text of the Strategy, as they directly influence and contribute to media structures and functioning.

4. The goals and specific measures of the media strategy should be informed by the context that includes identified inequalities, obstacles and risks and followed by proper budget for their implementation.

It is positive that Operative goal 1.5 recognized the need for an *increased percentage of media content dedicated to people with disabilities, LGBTQ, former users of psychoactive substances, women who are victims of domestic violence, Roma and Egyptians, whereas the final indicator of performance, as well as a legally prescribed obligation of the public service and public broadcasters to create a minimum % of programs dedicated to these groups*. However, this activity does not relate to the contextual analysis and lacks monitoring system, so this activity seems to be purely declarative. The same applies to the Strategic Goal 9: *Promotion of gender equality*, that is not even related to NSGE 2021-2025, which is why we get the impression that it was included only in order to fulfill the minimum norm of gender mainstreaming of the strategic document.

However, without prior analysis of the problem-causing, these goals communicate only formally, without essential determination to be sustainably achieved. For example, if there are no adequate and trained human capacities in the Electronic Media Agency or the Public Service, who is to conduct monitoring and research on the percentage of gender-sensitive content? It is clear that formal recognition or mere adoption of regulations, without a guarantee of implementation and a control mechanism, does not guarantee the fulfillment of even a minimum standard.

⁹ Document is available at the link: https://www.europarl.europa.eu/doceo/document/A-8-2018-0031_HR.html

5. Use gender-sensitive language in the text of the Strategy.

The Ministry should set an example for other institutions, so we recommend a mandatory use of gender-sensitive language¹⁰, that was scarcely used in the proposed text of the Strategy. Consistency in this sense is especially important for achieving the Strategic Goal 9, aiming to *increase the use of gender-sensitive language in all program contents*.

6. Recognize national mechanisms of gender equality, international organizations and CSOs dealing with gender equality as partners in the implementation of strategic measures.

The strategy mentions CSOs through the recognition of actors in the area of jurisdiction over implementation, and as a part of the future *Commission for Monitoring the Implementation of the Media Strategy of Montenegro 2022-2026*. However, it is necessary to recognize NGOs with proven experience in the field of gender equality.

RECOMMENDATION 2: Media strategy needs to be additionally harmonized with the National Strategy for Gender Equality 2021-2025

Explanation: We welcome the partial alignment of the measures of the Action Plan of the Draft Media Strategy 2023-2024 within the Strategic Goal 9 (starting from measures 9.1.1 to 9.1.6) with Operational Goal 2 of the Action Plan of the National Strategy for Gender Equality 2021-2025¹¹. However, to avoid mere rewriting from the second Strategy, the proposed text of the Draft should further elaborate the shortcomings of current, gender-responsive media reporting and monitoring. Sources of useful data can be found in the text of NSGE 2021-2025 itself.

In addition, according to the NSGE 2021-2025, media have a precisely defined responsibility to report on the implementation of the of the Strategy measures, which is why the measures within Strategic Goal 9 should be supplemented with an indicator: the number of media reports on this topic.

The measures within the Action Plan that particularly need to be harmonized with the measures from AP NSGE:

1. Measure 3.4 AP NSGE: *More effectively protect women and persons of different sexual and gender identities from economic violence, and according to it activity 3.4.1.*

¹⁰ It is legally binding according to the Article 13a of the Law on Gender Equality

¹¹ "Improve policies in the field of education, culture and media in order to reduce the level of stereotypes and prejudices against women and persons of different sexual and gender identities) especially measures 2.3. (Organize media literacy training in order to recognize all types of stereotypes, including gender stereotypes), 2.5. (Encourage the media to introduce gender-responsive programs and use gender-sensitive language) and 2.6 (Introduce monitoring of media coverage from a gender perspective - gender-responsive media monitoring)".

organize an information campaign through the media and social networks to recognize economic violence for different groups of target audiences, should be provided in the Action Plan of the Media Strategy with the definition of indicators: percentage of published articles on this topic and target values for the next period.

*2. Measure 3.6 AP NSGE: Organize campaigns for a more equal distribution of work at home, care for children, care for elderly, people with disabilities, etc. between men and women and regularly monitor data on the participation of men and women in unpaid care work and household work, and in accordance with it, activity 3.6.1. Organize an educational campaign through the media and social networks with the aim of encouraging an equal distribution of work at home and encouraging fathers to use parental leave, should be covered in the Media Strategy Action Plan. This is directly related to the media reporting on EU Directive on Work-Life Balance for parents and careers¹² in order to encourage the Government to fully incorporate it in our normative and institutional framework. Important information regarding this can be found in the 2019 Gender Equality Index of Montenegro, which states that *more than 90% of female journalists reveal that their undefined working hours represent a great burden for finding a balance between family, social and professional life (...)*. It becomes even more complex with single parenthood. One of the participants in the research spoke about the lack of understanding among colleagues for her duties as a single mother, as well as about a situation in which greater support and understanding would be expected. Instead, this journalist is confronted with patriarchal norms in an unexpected way, where she is required to stay longer at work, due to the fact that “she does not have a husband to take care of.”¹³*

Therefore, we suggest that measures included in the Action Plan, followed by clear and measurable indicators, encourage flexible working conditions in order to encourage a balance between work and private life, such as remote work and other flexible models for both women and men, that wouldn't affect their career advancement.

3. Measure 3.8 AP NSGE: Assess the impact and implement prevention measures in order to reduce the negative impact of climate change and natural disasters on the health of women, men, persons of different sexual and gender identities, as well as marginalized and particularly vulnerable persons and groups, and in accordance with its activity 3.8.3. Conducting information campaigns through the media (public broadcasters) and social networks should

¹² Text of the Directive can be found at <https://eur-lex.europa.eu/legal-content/HR/ALL/?uri=CELEX:52017PC0253>

¹³ Gender Equality Index, Montenegro, 2019, made on the initiative of the Gender Equality Department of the Ministry of Human and Minority Rights, in cooperation with the European Institute for Gender Equality (EIGE) and the United Nations Development Program (UNDP) in Montenegro, within the Project "Support to anti-discrimination and gender equality policies" financed by the EU, p. 27. URL: <file:///C:/Users/Korisnik/Downloads/Index%20rodne%20ravnopravnosti%202019%20for%20web.pdf>

also be foreseen in the Action Plan of the Media Strategy, with a previous reference to these issues in the narrative part that deals with the analysis of the situation.

4. For these reasons, we consider it necessary to supplement the chapter LEGISLATIVE FRAMEWORK by referring to the provisions of the National Strategy for Gender Equality in Montenegro 2021-2025 with information from the part concerning the media, which, among other things, also refers to the fact that: "The media often contribute to the multiplication of gender and other stereotypes, mostly due to the decline of professional standards, lack of adequate regulation and self-regulation, as well as insufficient knowledge about gender equality. On the other hand, the increasingly intensive use of social networks leads to the multiplication of gender stereotypes and the increasing presence of online violence, where the most frequent victims are girls, women and people of other gender identities. Because of that, it is important to directly address this problem through appropriate laws and public policies dealing with media, digital services and audio-visual services."¹⁴ This kind of narrative is generally missing from the Media Strategy Draft.

When it comes to activities related to the achievement of this goal, it is necessary to create trainings for editors related to gender equality. Furthermore, it is necessary for male and female managers/editors to be trained in topics of gender equality in order to achieve networking and successful development of policies in this area.

As part of the proposed activities, it is necessary to establish more effective mechanisms for appeals and complaints about the work of the media, which would lead to improvements in the way they report about women.

RECOMMENDATION 3: The chapter on MEDIA LITERACY needs to be further elaborated from the aspect of gender-based analyses

Explanation:

"In order for the information published by the media to be understood and used for making good life decisions, to deconstruct stereotypes and to sensitize citizens on gender, it is necessary to develop the skill of critical reading of media content"¹⁵. Therefore, measure 9.1.6. *Prohibited display of misogynistic and harmful content directed at women* is not sufficient in terms of the broader scope of activities that should contribute to the debunking of gender stereotypes in the media, including through media literacy processes. Promotion of a balanced and non-stereotypical imaging of women, is one of the two strategic goals of the Beijing Platform for Action adopted at the Fourth World Conference on Women held in 1995 in Beijing, above all, it requires knowledge to avoid stereotyping of men and women. Continuous representation of men in active social roles, and more passive roles assigned to

¹⁴ National Strategy for Gender Equality 2021-2025, *ibid.* p. 46-47

¹⁵ *Ibid.*, p. 47

women with the emphasis on marketing and tabloid sexualization of the body and/or the eroticization of violence, has a negative impact on the struggle to create body positive approach, to eradicate violence, since they transmit a distorted imaging that supports sexism and discriminatory practices. It is necessary to direct attention to certain commercial contents that influence the perceptions of young people and to continuously create awareness raising campaigns. On the other hand, all those contents related to family planning and reproductive rights must be aimed equally at men and women in order to break traditionally rooted expectations when it comes to the gender roles.

Therefore, in addition to the need to introduce *media literacy as a compulsory subject* at all levels of education, and in accordance with measure 3.4.1. *Establishing the chair of investigative journalism*, gender equality should be included in curricula for future journalists. Also, within this sectorial policy, the education of women in STEM should be affirmed, in order to encourage other important professions in the media sector that require these skills (such as sound technicians or audiovisual technicians), and in accordance with Operational Goal 2 of the National Gender Equality Strategy 2021-2025.

RECOMMENDATION 4: It is necessary to further develop measures within the framework of Strategic Goal 4: Improving the environment for the safety of journalists - Operational Goal 4.1. Mechanisms are provided to deter threats and damage to the physical integrity of journalists.

Explanation:

In addition to the references made in the text of the Draft Media Strategy to the EC Report on Montenegro for 2021, which refer to the issues of protecting journalists from threats and violence, especially through effective investigations of previous attacks and deterrent punishments, it is necessary to consult the reports prepared by the *Commission for monitoring the actions of competent authorities in investigations of cases of threats of violence against journalists, murders of journalists and attacks on media property*¹⁶. In the reporting period, the Commission considered various cases of attacks or threats against journalists, of which some were related to cases of attacks and/or threats against female journalists which are often accompanied by misogynistic and insulting comments about their gender such as: "Throughout history the French have had the best machines for women like you. French Queen, guillotine"¹⁷.

In order to adequately meet the official recommendation from the Report of the EC of Montenegro for 2021, to which this Draft Strategy refers: *Montenegro should step up in its efforts to effectively investigate, credibly solve and adequately sanction cases of attacks on*

¹⁶ Document is available at : <https://www.gov.me/dokumenta/ab301455-8bae-4108-ac7c-b2508a50a494>

¹⁷ Report of the Commission, *ibid.* p. 23

*journalists*¹⁸ it is necessary to devise targeted measures that will promote "an environment suitable for investigative journalism and media freedom", above all, to react promptly and publicly condemn hate speech and threats, and suppress political pressure on journalists, including through public statements¹⁹, and in this sense supplement the Strategy.

The line Ministry calls for a higher level of sensitivity when it comes to the work of the Commission for monitoring the actions of competent authorities in investigations of cases of threats and violence murders of journalists and attacks on property, which defined as extremely important steps in their work program "the provision of an electronic database on attacks on journalists, in which all documents and data that have been and will be delivered by the competent authorities would be stored, as well as the establishment of the Commission's website"²⁰. Such a database is particularly important in order to monitor the degree of frequency and end the praxis of attacks on female journalists, where, on the basis of these data, further measures to prevent and suppress it would be developed. In the Report, it is stated, among other things, that the Commission for Support addressed Ministry of Public Administration, Digital Society and Media (at that time), but that failed to respond by the day of adoption of the Report.

RECOMMENDATION 5: Anticipate activities in accordance with the objectives of the Digital Transformation Strategy of Montenegro 2022-2026 in such a way as to explore the needs of particularly vulnerable categories such as older women and women from rural areas

Explanation:

The descriptive section on MEDIA LITERACY rightly noted the fact that no research has been conducted so far that would identify groups in a sensitive position and their needs in relation to digital literacy. MONSTAT data indicate that in 2019, 19.8% of men have never used the Internet, while among women that percentage is higher and amounts to 21.3%²¹. *Bearing in mind* Operational objective 2.1. Action Plan of the Digital Transformation Strategy of Montenegro 2022-2026 (*Raising awareness of citizens and the economy about the importance of digital development*) and activities in accordance with it 2.1.7 (*Development of promotional campaigns based on the results obtained by conducting research on the satisfaction of citizens and the business community*) with the accompanying indicator (*Number of campaigns to reduce the digital gender gap*), proposed AP measure 5.1.2 of the Media Strategy Draft (*Preparation of a comprehensive analysis of the level of media literacy by target groups and*

¹⁸ EC report for Montenegro for 2021, p. 33. URL: <http://www.euic.me/wp-content/uploads/2021/12/Prevod-Izvjestaja-za-Crnu-Goru-za-2021-godinu.pdf>

¹⁹ See Report of the EC of Montenegro 2021, *ibid*

²⁰ Report of the Commission, *ibid*, p.4

²¹ Women and men in Montenegro, 2020, MONSTAT, p. 59. URL: https://www.monstat.org/cg/publikacije_page.php?id=212&pageid=142

gender structure) with recommendations, should be expanded in a way that for the **first time the needs of improving digital skills and the creation of campaigns aimed at older women and especially women coming from rural areas are taken into account.** The areas where these vulnerable categories live are particularly underdeveloped, which is also reflected in access to the media, often measured by the possession of one television in the household, without the Internet connection. Taking all of this into account, the opportunities offered by the radio connection should be used more. In addition, special attention should be directed to the needs of persons/especially women with disabilities.

RECOMMENDATION 6: The media strategy should call for the immediate adoption of the Strategy against hate speech

Explanation: We welcome a significant contribution dedicated to the goals and activities for combating hate speech and the spread of misinformation. However, we need to emphasize that hate speech specifically targets women, namely women in public positions, through internet platforms and social networks and thus contributing to the reproduction of existing gender stereotypes and misogyny. Hence, we call for the adoption of the Strategy against hate speech, that relies on suppression of causing or inciting hatred or intolerance on any basis, and in accordance with the Constitution of Montenegro and the Recommendation of the Council of Europe on the prevention and suppression of sexism CM/Rec (2019). The strategy would make it clear that the state is determined to stand against any form of inciting hatred, which is against public interest and deepens divisions and negative stereotypes, and ultimately leads to physical violence²². Public campaigns for this purpose are needed, which is why the measures from the Action Plan (Operational objective 1.3.) should be extended to these requirements. International organizations (UNESCO) should be recognized together with the civil sector as bearers of related activities.

RECOMMENDATION 7: Consider the introduction of a gender-sensitive budget and develop calls for competitions for journalistic research/stories on gender equality.

Explanation: The Ministry of Culture and Media, in cooperation with other departments, needs to create programs and allocate specific funds to affirm the advancement of women in the media (including professions such as directors, editors, producers, etc.). Competitions for journalism students with the promotion of the prize for the best paper on gender equality, including investigative journalism, can also contribute to strengthening the visibility of women in this sector.

²² The reaction of the Women's Rights Center regarding the misogynistic attitudes of a member of the National Commission for UNESCO, url: <https://womensrightscenter.org/czp-i-hra-od-postojece-vlade-trazimo-da-hitno-razrijesi-jovana-markusa-clanstva-in-the-national-commission-for-unesco-and-devise-a-strategy-for-the-fight-against-hate-speech/>

In the small Montenegrin media market, there is no transparency of media ownership, nor sex-disaggregated data on ownership.

INSTEAD OF A CONCLUSION

Although the Draft Strategy was put up for public discussion in March 2022, by the time this analysis was published, the document had not been adopted. That is why we were not able to evaluate the degree of adopted suggestions and draw conclusions about the strategic direction of the future media policy in the country. In the meantime, this analysis, together with the accompanying recommendations, has served Women's Rights Center in advocacy initiatives at the national and EU level, within which we have always referred to recognized shortcomings of the proposed legal and strategic solutions in the media sector. As the main advocacy activities were undertaken on the national level, original analysis was produced in Montenegrin, while the above document in English was reduced to main findings most important for the EU related advocacy.

Due to the universal importance of the topics we covered and the fact that they are still very current, the Women's Rights Center will continue to monitor the processes in the country and advocate for gender parity in all segments of society, especially in the media.

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https://www.instagram.com/centarzazenskaprava_wrc

https://twitter.com/CZP_Cg

