From media self-regulation to 'crowd-criticism': Media accountability in the digital age

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ABSTRACT: This paper seeks to explain the potential impact of new forms of media accountability in the digital age (i.e. media blogs and media criticism via Twitter and Facebook), as well as the failure of many traditional instruments of media self-regulation (i.e. press councils and media journalism) from a theoretical perspective. North's theory of institutions will be employed to analyze why traditional instruments of media self-regulation often cannot successfully monitor and sanction deviation from professional standards in journalism. Drawing on institutional economics, a media accountability model including the audience in the digital age will be developed as an alternative. This audience-inclusive model may prove more effective in the long term, as 'costs of complaint' sink, and the utility function of the new 'digital media critics' may result in a more effective media criticism. The paper concludes with implications for media policy.

KEYWORDS: media accountability; institutional economics; media ethics; media criticism; participatory models; Internet and Web 2.0

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MEDIA ACCOUNTABILITY: AIMS AND INSTRUMENTS

With regard to the prominent role mass media play in modern societies, a growing number of media scholars have emphasized the urgent need to hold the mass media accountable in past years (i.e. Nordenstreng, 1999). This call has been echoed by concerned media professionals, and discussed worldwide in cases like the *News of the World* scandal in Britain. Observers agree that the quality of the media has to be monitored because of their unique function for democratic societies (McQuail, 1992): They create a public sphere, where controversial arguments regarding political (and other) matters are being exchanged. Scholars also assume that the agenda-setting function of the mass media will continue even though the Internet, especially the Web 2.0, has a considerable impact on the traditional gate-keeper role of journalists (Bruns, 2005).

Therefore, societies must have a genuine interest in the quality of information provided to them by the mass media. However, journalists and media organizations
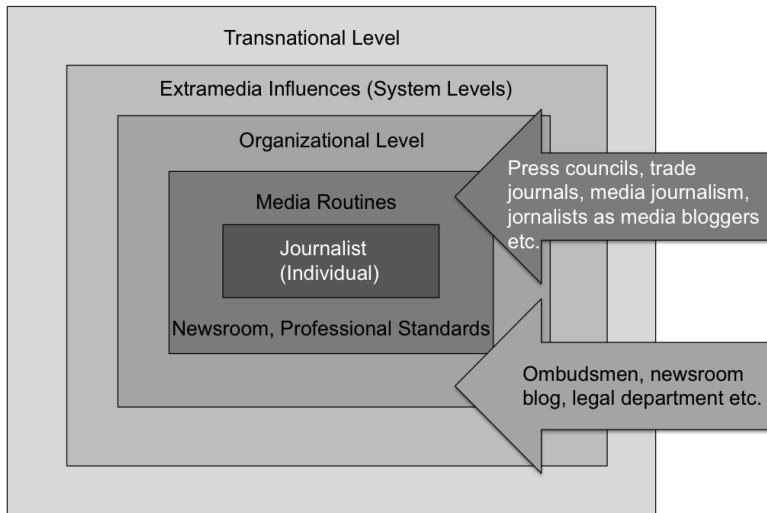
often do not live up to expectations, and "(m)edia can cause serious harm" even "without violating the law" (Bertrand, 2000, p. 22; see also Baldi & Hasebrink, 2007, p. 17). Therefore, various "non-state means" (Bertrand, 2000) have developed to hold the media accountable in past decades. Press councils, ombudsmen, media journalism, etc. all have the task to monitor journalists' professional performance and follow up on journalistic malpractice in countries which guarantee freedom of the press and thus forbid state interference into journalism.[1]

Two potential areas of (self-)regulation can be distinguished (adapted from Puppis, 2009, pp. 57, 61):

- *Media structures* (including media technology and channels of distribution)
- *Media output* (journalistic content and processes)

In the context of this paper, only the latter will be considered; the (self-)regulation of media structures (especially broadcasting) has been extensively covered in other studies.[2] Press councils, ombudsmen, and media criticism — and more recently media blogs and social media initiatives — can either criticize journalistic processes (research, selection, presentation techniques) or the journalistic content of the various print, online and broadcast news outlets. According to the widely used model of spheres of influence on journalism by Shoemaker and Reese (1996), they can be located at a professional (media routines) and the organizational level.

Table 1. Media accountability instruments

Source: Model adapted from Shoemaker & Reese (1996), amended by author.

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[1] While in countries with restricted or no press freedom, state (or religious) authorities monitor media performance and punish journalists "faults," as documented annually in the press freedom index on www.rsf.org.

[2] See for example currently the EU-funded MEDIADEM research project, www.mediadem.eliamep.gr.

THEORY OF INSTITUTIONS

All these media accountability instruments publicly expose malpractice in the media, i.e. they monitor whether journalists act according to professional standards (as well as legal requirements), and thus deserve the trust of the public as their key stakeholders: Press councils, ombudsmen, media blogs and the like should reinforce the rules of journalism, especially the self-imposed codes and norms members of the profession have agreed upon. We therefore suggest discussing media accountability in the context of institutional economics as a meta-theoretical perspective, and consider both press laws and journalistic codes as *institutions*, which serve to build a trust relationship between journalists and their public by laying open what rules journalists are expected to operate under.

According to North (1990), institutions have been created by advanced societies to facilitate interactions between (individual or collective) actors. "Institutions are the rules of the game in a society or, more formally, are the humanly devised constraints that shape human interaction. In consequence, they structure incentives in human exchange, whether political, social, or economic. […] Institutions reduce uncertainty by providing a structure to everyday life" (North, 1990, p. 3). North's idea of institution is implicitly echoed in Bertrand's definition of journalistic ethic codes: "In every organized craft […], the ethics codes aim at eliminating crooks and quacks. The code informs the public on the particular trade: it tells about its rules of conduct. By thus increasing its credibility, it insures [sic] the loyalty of its patrons, and, in the case of the media, the loyalty also of its advertisers, the source of its prosperity" (Bertrand, 2000, p. 42).

The relevant interaction considered here is between journalists and their public, who should (in theory) be able to rely on the assumption that journalists stick to certain standards: Stories are supposed to be respectful to objectivity and impartiality, no unethical methods should be used to collect information for the story, and a journalistic piece should be constructed in a different way than a PR piece. Then, the public can develop trust — i.e. reduce uncertainty — in the rather anonymous media organizations,[3] which are operated by journalists and managers the audience has never met personally. "In a world of impersonal exchange, we are exchanging with multiple individuals and can acquire very little information about all of them. Our information is not only imperfect, but varies remarkably from one party to another. Many times the exchange is a once and for all exchange and not repeated at all" (North, 1990, p. 57). This makes institutions even more valuable. Which institutions shape journalism?

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[3] From an economic perspective, the relationship between journalists and media users is characterized by severe information asymmetries. "(A) news story about a particular event is an experience good, since to judge its quality you need to consume it by reading or watching the story" (Hamilton, 2004, p. 9), and even after consumption, a media user — without any insight to the editorial process — cannot fully evaluate the quality of a piece of journalism.

Institutional economists assume that laws (written rules) are highly relevant for developed societies as *formal institutions*: Laws specify demands how actors should behave in a given situation. If people do not adhere to the law, they may be sued and risk punishment. The same applies for journalists in democratic societies who have to respect (few) press laws, often focusing on libel and the protection of youth. Compared to other sectors, however, the media sector is characterized by an almost complete absence of formal institutions: In democratic societies, press freedom is a pillar of the constitution,[4] and requires that the state resp. government does not interfere into the processes and products of journalism — as it has done for centuries (and still does in autocratic states), when newspaper issues had to be licensed by state supervisors, broadcasting stations were solely run by the government, and journalists were sent to jail when daring to criticize authorities, as Central European countries know all too well from recent history.

However, North (1990, p. 4) also points out that "unwritten laws" — *informal institutions* — are as influential for the functioning of a society. As it is impossible to envision laws for every potential human interaction (and ridiculously costly to reinforce them legally), everyday interactions can only process smoothly if people stick to accepted informal institutions like norms and conventions (codes are considered an informal institution as well) which remain quite stable over time. "That the informal constraints are important in themselves (and not simply as appendages to formal rules) can be observed from the evidence that the same formal rules and/or constitutions imposed on different societies produce different outcomes" (North, 1990, p. 36).

Wiedemann (1992, p. 14) accordingly argues that since there are so few press laws in democratic states, the need for self-regulation is even greater. In the media sector, journalistic codes and norms constrain journalists' decisions, as they contain directives about what journalists are supposed to do and not to do. By now, most journalism cultures have developed press codes, and Laitila's study (1995, p. 538) found that almost all European codes request journalists to act truthfully, honestly, and provide accurate information (see also Bertrand, 2000, p. 45). Serving as the "conscience of journalism" (Limor & Himelboim, 2006, p. 266), they for example specify how journalists should interact with their sources. From the perspective of institutional economics, journalistic codes and norms are to be considered as *informal institutions*; institutional economists similarly consider mores, customs and rituals as informal institutions. Puppis (2009) observes that the United States, with its early-deregulated media sector, has also been a trendsetter in the field of creating informal institutions of journalism — in fact, U.S. journalists have been the first

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[4] Campbell (1999, p. 748) has argued that the lack of any mentioning of press freedom in the constitution has led to more pro-active self-regulation activities in Britain; Loit et al. (2011) have argued the other way round that the more formal laws exist, the more successful media accountability may be as a mediating instrument.
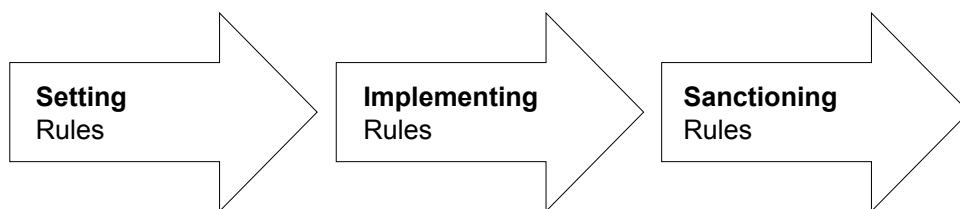
to form a professional federation, pass a press code, and invest in journalism education (Marzolf, 1991).

Moreover, professional norms and values in journalism are communicated and passed on in the newsrooms (Tuchman, 1978; Gans, 1979) Besides, scholars of institutional economics stress the value of (journalism) education. Norms and values — and thus "informal constraints" — "come from socially transmitted information and are a part of the heritage that we call culture. […] Culture can be defined as the 'transmission from one generation to the next, via teaching and imitation, of knowledge, values, and other factors that influence behavior' (Body and Richerson, 1985, p. 2)" (North, 1990, p. 37).

MEDIA SELF-REGULATION FROM A THEORETICAL PERSPECTIVE

A key concern for scholars of institutional economics is the impact of institutions, and what can be done to strengthen their effectiveness. "(C)reating a system of effective enforcement and of moral constraints on behavior is a slow, long process that requires time to develop if it is to evolve […]"[5] (North, 1990, p. 60). Similarly, Bertrand (2000, p. 152) states for the field of journalism that "ethics are not enough," and not all journalists are "endowed with a moral sense" (Bertrand, 2000, p. 41); therefore it needs media accountability instruments to 'effectively enforce' the codes and norms adopted in a given journalism culture.[6] To further explore the structures of media accountability, we can draw on Puppis (2009, pp. 36, 57) who defines *media self-regulation* as a *process of setting, implementing and sanctioning rules* regarding mass media organizations and mass media content (see similarly Campbell, 1999, p. 714).

Table 2. Process of media self-regulation

Source: According to Puppis (2009).

However, according to Puppis (2009, p. 36), self-regulation is exercised by an *organization* founded by companies in the respective sector, which possesses a certain autonomy, sets and implements rules for the sector, and punishes breaches of

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[5] Laitila (1995, p. 540) has observed that the European codes have become more elaborate over time.
[6] Respectively a given organizational culture, as Jarren and Zielmann (2005, p. 549) points out.

rules; among the media accountability instruments discussed here, this only applies fully to press councils. In contrast, many instruments relevant for media accountability — like ombudsmen, media criticism or media bloggers — have not been institutionalized by the profession, but have been introduced at an organizational or even individual level; they sometimes have no autonomy, or no formal procedure to punish any breach of rule, and yet they are effective, at least on occasions. Therefore, we argue that media accountability needs to be discussed distinctly from the discourse about media self-regulation; even more so as we will soon argue that actors outside the media sector play an increasing role in holding the media to account in the digital age.

We can, however, follow Puppis's logic by stating that all instruments of media accountability like press councils, ombudsmen, media journalists, media bloggers, etc. are involved in *monitoring* violations of rules in journalism, and — to varying degrees — *punishing* those who have deviated from the rules.[7] Whenever they remind media professionals of standards not adhered to, or expose violations of the rules, media accountability instruments (can) reinforce the institutions of journalism and thus help to preserve trust in journalism as the *social capital* of the media. But why do they so often fail or remain "toothless tigers," as media observers in many countries complain (see Eberwein et al., 2011)?

Problems with monitoring media performance

According to institutional economics, the impact of formal and even more so of informal rules depends on a successful detection of violation of rules, and the ensuing vigorous punishment of the violator — which is costly. North (1990, p. 54) states that enforcement of institutions is "typically imperfect" a) because of the high costs of measuring deviation from standards (monitoring), and b) because enforcement often is "undertaken by agents whose own utility functions influence outcome."

The costs for monitoring the quality of journalism in the 24/7 news cycle with its constant output of news indeed are high, even more so in the digital age, since a massive and steady flow of journalistic information is being produced which would overwhelm any actor or institution aspiring to monitor the full range of journalistic products being put out by newsrooms. Interestingly enough, research

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[7] At this point, we also need to clarify the concept of "media transparency" which is sometimes discussed (as this paper argues, wrongly) synonymously with media accountability. Media transparency means that media organizations make information about editorial processes as well as the journalistic actors themselves available to the public. Media transparency instruments, as listed by Meier and Raimer (2011), help the audience to better assess the quality of a journalistic process or product. An example: If a journalist uses the Internet to lay open his research process for a certain story, the reader can track the research path and better assess if the research was thorough. Thus, media transparency instruments serve to signal trustworthiness, but neither do they fulfill a monitoring nor a reinforcement function, and are not discussed in the context of this paper hereafter.

on the content of media blogs (Fengler, 2008; Eberwein, 2010) shows that even these new instruments of media accountability often concentrate on monitoring the content of leading quality media. Hundreds of blogs, for example, monitor the *New York Times* — probably for economic reasons: It is convenient, accessible, and the medium is prominent and reliably draws some attention to a blog criticizing it; but myriads of regional papers, or online and broadcast media with its fugitive content, are much harder to monitor, less attractive to a broader public, and thus often left out. Regarding the costs of monitoring, Campbell (1999, p. 760) also reminds us that it might be quite hard to judge whether a violation of rules has truly taken place. Is the story really impartial, or does the judgment reflect the critic's political bias? How to prove that the journalist got freebies for the story?

As mentioned by North, effective enforcement of rules also requires a monitoring body which has no self-interest in limiting the scope of the investigation. North (1990, p. 58) emphasizes the utility function of the rule enforcer as a main hindrance to successful (self)regulation: Those who are appointed to monitor standards may themselves have a rather "egoistic" interest in not fully exposing and punishing deviation from the rules. In fact, studies show that media journalists have often a limited interest to fully expose problems in their own profession (Fengler, 2002; Malik, 2004), since they seek to remain on good terms with their colleagues and supervisors. "Members of the press just don't apply the same ethical standards to their peers that they apply to politicians, judges and business big shots" (Glassmann, cited in Limor & Himelboim, 2006, p. 265). Obviously, individual and collective interests of media professionals weaken media accountability instruments, but can also be seen as a main motor for the creation of such instruments, as Laitila (1995, p. 531) explains for the example of press codes: "(T)heir function is to specify accountability with regard to different outside interests; mainly the state, the public, the sources and advertisers. Behind this is partly the need to 'look good' in the eyes of the regulators: to convince them that no further surveillance is needed." Similarly, when newspapers create media sections dealing with journalism, getting the attention of other media professionals is often the motive behind it (Fengler, 2002).

Problems with sanctioning media performance

Theorists emphasize that enforcement is the key to success of both formal and informal institutions. "(R)ules and informal codes are sometimes violated and punishment is enacted. Therefore, an essential part of the functioning of institutions is the costliness of ascertaining violations and the severity of punishment" (North, 1990, p. 4). In the media sector, "punishment" can come along in two different forms:
- Press councils in some countries issue fines to papers who have violated the press code (Puppis, 2009) and thus use *material sanctions* to punish journalistic malpractice, but the fines are usually rather symbolic and nothing media organizations need to be afraid of.

• Most often instead, *immaterial sanctions* are applied: Ombudsmen, media critics, media bloggers, social media, and also many press councils publicly question the integrity of a news organization or a journalist and thus may wreck its/his reputation, which can be considered its/his social capital: "(R)eputation is a valuable asset" (North, 1990, p. 50; see also Ripperger, 2003, p. 183). However, an evaluation of an individual's or an organization's reputation requires that the information about its trustworthiness is available in public (Ripperger, 2003, pp. 100, 196). Similarly, journalists can only be successfully deprived of their reputation when their violation of rules is made *public*,[8] and this lack of publicity is one of the key problems of media accountability across borders (i.e. Campbell, 1999, p. 761; Wied & Schmidt, 2008, p. 180). Too often, knowledge about journalistic mistakes circulates only inside the profession — while journalists continue to demand full transparency, i.e. from the political sector.

North (1990, p. 57) adds that successful monitoring requires incentives for the "guardians" as well: "(B)ecause punishment is often a public good in which the community benefits but the costs are borne by a small set of individuals, institutions must also provide incentives for those individuals to carry out punishment when called on to do so." In journalism, such "incentives to carry out punishment" do not seem to exist. Instead, in the heavily politicized media systems of Italy and France, media self-regulation activities can even be sanctioned by media owners (Baisnée & Balland, 2011; Mazzoleni & Splendore, 2011), as media criticism equals political criticism. Obviously, the pitfall of media accountability is that its instruments have very limited sanctioning power: In the media sector, "self-regulation rarely lives up to its claims" (Campbell, 1999, p. 771) because of "inadequate enforcement" (Ibid., p. 756). But "(w)ithout adequate incentives to comply, 'bad actors' will be unlikely to comply, and the 'good actors' that do comply will be placed at a competitive disadvantage" (Ibid., p. 718). Also in the field of journalism, quite often "(t)he gains from cheating and reneging exceed the gains from cooperative behavior" (North, 1990, p. 55). Journalists criticized for plagiarism, or inventing stories, are often not fired; if so, many soon find a new job at another news outlet. This is especially concerning, since game theory emphasizes the impact of positive role models on people's general willingness to act morally (Ripperger, 2003, p. 157).

WIDENING THE CONCEPT OF MEDIA ACCOUNTABILITY: INTRODUCING THE AUDIENCE

For the media sector in the United States, Campbell (1999, p. 755) concludes that the examples for self-regulation she looked upon "do not provide a great deal of support for the claimed advantages of self-regulation." European scholars might

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[8] We therefore exclude *internal mechanisms* applied within the newsroom to monitor journalistic processes and products — like internal criticism, newsroom conferences, cross-checking, etc. — from the list of media accountability instruments.

come to a similarly skeptical conclusion (Eberwein et al., 2011). Given this obvious insufficiency of traditional instruments of media accountability — which mainly result from the collective or individual self-interest of media professionals — two options seem to be available to solve this dilemma, and will be discussed below:

• *Political intervention*: A solution might be that the state becomes more involved in media accountability, either as a sanctioning body, or by providing incentives to comply with the rules.

• *Market intervention*: A second option could be that non-state actors — especially the media users — become more involved in holding the media accountable.[9]

Political intervention

As a possible solution for the obvious flaws of traditional instruments of media accountability, scholars like Jarren have called for a stronger role of government in recent years and supported media "co-regulation" by the state (Puppis, 2009, p. 41). In fact, we do find examples from the past where political intervention successfully strengthened media accountability: In Germany, the state successfully forced the profession to voluntarily create a press council in the 1950s, threatening that government would otherwise get involved in press regulation. However, in the 1950s the restrictive media policy of the Nazi regime was still a close memory for many German journalists; and even in liberal Great Britain, where a similar development took place after World War II, the press had made its experiences with censorship and state interference during the war (Wiedemann, 1992). Arguably today's generation of journalists would be less fearful of any such government threat, and would instead point any politician bold enough to suggest state regulation to the highest courts. When Campbell (1999, p. 760) points out that "the 'successful' instances of self-regulation generally involved situations where there was some government regulation" and says that "the major incentive for industry to self-regulate is to avoid the threat of government regulation" (Ibid., p. 769),[10] this may not be a pragmatic option for today, especially in a time when media plurality is endangered by processes of media concentration anyway. However, we should note that in the past, state intervention was mostly associated with *sanctions*, while the potential variety and impact of state *incentive*s for media accountability has by far not been explored. For example, a portion of the German press council's annual budget is — unknown to many people — paid from the government's budget. This might be one of the rare examples where the state supports media (accountability), but does not interfere in it at all politically.

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9 Hoping that advertisers might add their share by supporting news outlets adhering to journalistic standards may be wishful thinking, given the economic interest of advertisers to reach a maximum audience.

10 "Where the threat of government regulation receded — as in the case of the [U.S.] National News Council — self-regulation failed" (Campbell, 1999, p. 758).
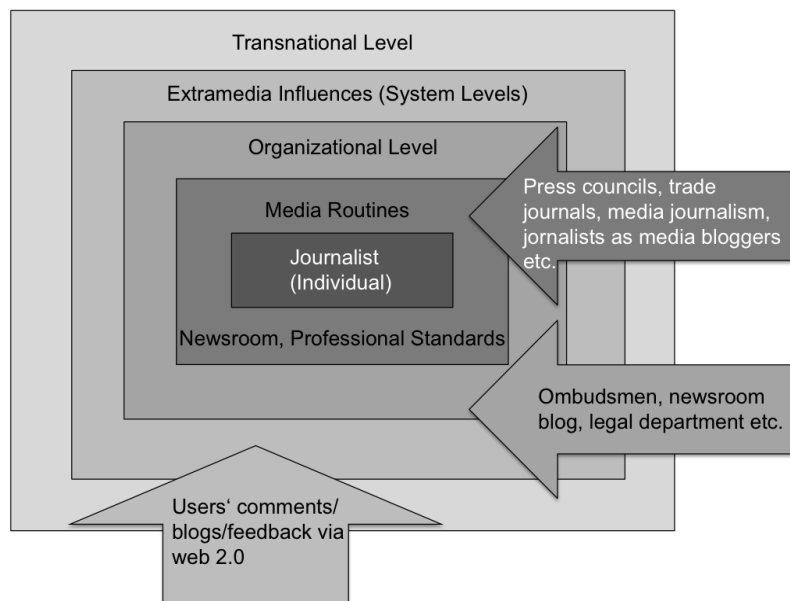
However, when we go along with theorists who warn that it is in general rather unlikely that the state behaves like an "impartial third party" (North, 1990, p. 58), this might be even less likely when it comes to journalism, as the recent case of the Hungarian media law vividly illustrates. Among many other things, this media law, developed by a member of the governing Fidesz party, pushed for more self-regulation, but the media authority to oversee also these "self-regulatory" activities was to be made up from government members with a clear political agenda to influence media content.

Market intervention

Therefore, we argue that including the "market" — via engaging the public, i.e. media consumers — might be a promising option to strengthen media accountability. In past decades, the audience was considered either not interested or not knowledgeable enough to evaluate journalistic performance; and we might discuss if the reason for this is that media professionals (especially in non-Anglo-Saxon journalism cultures) had (or have) a rather negative perception of the public. Moreover, before the advent of the Internet and Web 2.0, it was rather costly for an unsatisfied media user to voice his criticism. He could write a letter to the editor, call the newsroom, or — at best — contact the ombudsman, but all options were time-consuming and often left users frustrated. Also, calling a strange editor in a newsroom required a certain degree of personal stamina. Before the development of the Social Web, the vast mass of media users therefore was a "latent group" (Olson, 1971) — plenty of people, who maybe had an opinion about the quality of journalism, but no forum to coordinate their interests. Journalists and even more so media owners as a comparatively small group (Ibid.) instead could much more easily agree on common goals and pursue their strategic interests.

Today, technological development — the advent of the Internet and the Social Web — has lowered the cost of monitoring and "punishing" the media for an individual media user to almost zero for the first time in history. An infinite 'crowd' of users can share the burden of media monitoring online, and in the Web 2.0 era, suddenly there is a plethora of fast, low-cost options to (if you wish, anonymously) "voice" criticism and protest — via email, chats, commentary functions, Twitter, Facebook, and the like. North, in his famous study of institutional change, notes that institutions evolve over time, and thus constantly alter the choices available to us (North, 1990, p. 6). Most often this change is slow and takes centuries. However, given the rapid development in information technology, we are currently observing change in the options to hold the media accountable at a fast pace. Therefore, we argue to broaden the list of media accountability instruments to any current and future instrument online (and new venues offline as well) involving the audience:

Table 3. Media accountability instruments — professional, organizational and participatory

Source: Model adapted from Shoemaker & Reese (1996) and amended by author.

Compared to established instruments of media accountability, which are mostly operated by media professionals, those audience-inclusive Web-based media accountability instruments may prove less vulnerable to the flaws of self-regulation for reasons described below.

a) *Audience-inclusive models: New potentials to monitor media performance*

• *Expertise:* While the public might not have the expertise to judge journalistic performance from a professional point of view, their knowledge should not be underestimated as well. Along with Hasebrink et al. (2007, pp. 75–77), we conceive at least a part of the audience as neither disinterested nor unable to evaluate media quality. The audience should not only be regarded as consumers, but also as citizens, who have an interest in media's service to society (Ibid., p. 77),[11] and users of a prominent German media blog frequently cited such motives in a recent survey (Mayer et al., 2008, pp. 12–14).

• Regarding the *cost* of monitoring media accountability, we have already pointed out that individual costs for becoming involved in media accountability activities

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[11] Baldi, Hasebrink (2007, p. 17) adds the financial dimension of public broadcasting: "(T)here is a legitimate interest in public expenditure and true costs of publicly produced goods and services."

are far lower in the digital age. Individual costs may be minimal, but the cumulated effect may be strong (see below): It takes a minute or two to twitter about a media issue, but if several thousands of people start to twitter about a journalist's lapse, this might have an impact on this journalist's reputation. Changes become evident in practice already: The German Press Council has noticed a strong increase in users complaints, because complaint forms are easily spread via the Internet — and people use the Web 2.0 to encourage others to file a complaint — and received an unprecedented 240 complaints for one single case; the British PCC even received 25,000 complaints on a single case generated by an email-campaign (Eberwein et al., 2011).

b) *Audience-inclusive models: New potentials to sanction journalistic malpractice*

• *Motives:* Regarding the *utility function* that limits media professionals' vigor as watchdogs of their own profession, we can assume that media users interested in the quality of journalism have no such incentives to remain on good terms with media professionals, and thus can fully exploit their sanctioning power. Media users — while probably sporting other (often political) motives (Fengler, 2008) — thus have the potential to fully expose problems they observe in journalism in public. Furthermore, media users might not only become involved in media accountability because it is their normative "duty" as citizens, but also because they find media accountability entertaining. In fact, one of the rare studies analyzing the motives of the audience involved in media accountability instruments — a study by Mayer et al. (2008, pp. 12–14) who surveyed approximately 20,000 users of the famous German BildBlog — found that the majority of respondents (84%) cited entertainment as their main motive to use the site. In the Web 2.0 age, holding the media to account suddenly might generate instant rewards or entertainment, or may be socially gratifying, because it allows connecting with other people. Obviously, it is high time to include uses-and-gratification models to debates about media accountability.

• Regarding the severity of *punishment*, it is hard to judge the audience's impact by now, since no study exists, and the field is quite new. According to the 'network good' character of informal institutions in economic theory, the more media users become involved in holding the media to account, the more influential such audience-inclusive instruments of media accountability will be. Some examples are already known where online activities of media users caused media organizations to fire an editor-in-chief or prompted a journalist to excuse on air after a twitter campaign. We will need more time to follow and study media professionals' reaction to a new breed of (probably younger) media users who actively voice their criticism in the Internet, and compare its impact to those of the established self-regulation activities of media professionals. In a time when business models of jour-

nalism move away from the advertising industry and return to the media consumer, the influence of media consumers may grow.

CONCLUSION

Improvements in the field of media accountability may be achieved by tackling its 'weak points,' which have been identified by our meta-theoretical analysis using institutional economics. The following recommendations for media policy result from this analysis:

1. *Rethink costs of media accountability:* Following Hamilton's (2006) idea of state subsidies for quality in journalism, (material) incentives for media accountability instruments both undertaken by professionals and media users might be an option — even more so, as media users are as unwilling to finance media accountability instruments (Mayer et al., 2008, p. 26) as journalistic content in general. In many countries, media organizations benefit from tax exemptions — how about tying them to visible media accountability activities, and also granting certain privileges to audience initiatives?

2. *Strengthen expertise for media accountability:* Many EU and national projects now seek to foster the public's media literacy, which might have an impact on the audience's expertise in judging journalistic performance in the long-term. Journalists' unions, publishers' associations, and news outlets alike will have to make a larger effort themselves to communicate the professional rules of journalism by investing in the public's "accountability literacy." Otherwise, the "new media critics" may simply hold journalism accountable to their own standards.[12]

3. *Increase efficacy of media accountability:* After studying various practices of self-regulation in the U.S. broadcasting and media, Campbell came to the conclusion that successful codes are output-based and thus easy to measure quantitatively. For example, measuring the amount of minutes of airtime with content not suitable for children has proven a convenient tool, accepted by all actors involved. Measuring deviation from quality standards is obviously much more difficult. However, Campbell's findings might inspire future thinking in the field of media accountability: Why not starting by simply counting how many accountability (and transparency) activities a news outlet is involved in?

All media accountability activities should have a common goal: To preserve the social capital of journalism — trust — in a time when the newsroom model of information-processing is being grinded between portals and search engines. In accordance with participatory models of journalism, we should further explore models of media accountability in the digital age where both media professionals and media "amateurs" (i.e. users) bring in their individual expertise and motivation

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[12] Schönherr's study (2008, p. 122) shows that media bloggers almost never refer to journalistic codes.

to monitor media accountability. In the digital age, media accountability can probably only be pursued by a de-centralized network involving media professionals and media users, and — but only under the condition that press freedom is not harmed in any way — also the state.

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