

Understanding and Responding to Global Emerging News Threats

By Dr. Courtney C. Radsch

For Internews

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Executive Summary

Understanding and responding to global emerging news threats has never been more urgent. The global COVID-19 pandemic intensified a decade of pervasive democratic erosion and closing civic space that has put inexorable pressure on independent media around the world already struggling to figure out models of sustainability in the platform era. The overthrow of elected governments in Afghanistan and Myanmar and the Russian invasion of Ukraine propelled an unprecedented exodus of journalists that strained existing support mechanisms while underscoring the need for more strategic support from the foreign policy establishment and coordination by the international community.

The findings and recommendations in this white paper are based on extensive multimethod research grounded in the perspectives of media workers in three types of contexts: countries where pressure is building, where a fast pivot to worsening situation triggered a crisis, and journalists in exile and the countries which host them. It also draws on ethnographic research and a wealth of information produced by the media assistance and scholarly communities.

This white paper seeks to help the media assistance community learn and understand what type of support independent media partners on the ground need and use that information to recalibrate support to match evolving dynamics. It identifies acute needs of journalists and media in these situations, as well as longer term and structural needs.



The first section describes the rising repression, democratic deterioration, platformatization, and post-pandemic pressure that characterize the underlying conditions in which media around the world are operating for each of the three situational contexts. Subsequent chapters analyze each of the three types of contexts and provides key findings and recommendations. An additional section on coordination concludes the paper.

Many findings, such as the need for unrestricted funding over longer periods, better preparedness, and improved capacity building on digital security may sound familiar, as will the need for a more holistic approach to supporting a local enabling environment. Its additional emphasis on the global and technological enabling environment provides essential insight into what will be needed at an international level to enable local media to survive and thrive considering the limitations of country-based approaches highlighted in this study.

Pressure Building identifies some of the signs that civic space is closing which participants highlighted as being under-appreciated by the media support community. Media leaders and journalists need donors to explicitly consider how macroeconomic conditions influence the viability of different business models, including access to credit, financial gateways and exchangeable or volatile currency. They also want to be able to pay their staff, hire the positions they need to and make use of technology, and work collaboratively on the journalism they feel is most essential rather than what a donor or partner determines is a priority. The paper finds that project funding insufficiently covers the true costs involved, and the lack of core or unrestricted funding limits media from pursuing the stories, projects, and collaborations that they want.

When there is a fast pivot or crisis, media become even more politicized, and other institutions are affected in ways that put further pressure on independent journalism both inside the country and in surrounding areas, as well as in those that become migratory hosts. Safety becomes an acute priority. Business plans and revenue streams become moot. Audiences shift. Media and journalists need help preparing for and weathering these dynamics. When a crisis occurs, media need to be ready to work safely and remotely and update operational and editorial processes. Preparations are needed on both a personal and organizational level, though many lack the expertise, time, or funding to adequately prepare.

Journalists forced into temporary or long-term exile need immediate crisis support, relocation assistance, and operational rejiggering. Their audiences and priorities will shift, and they need support to figure out what exile and sustainability mean for them. They also want more opportunities for building solidarity within their host communities and with other exiled journalists,

as well as opportunities to keep their skills sharp.

Media need support to prepare their organizations and operations with respect to safety and resiliency, particularly digital security and resiliency. This means doubling down on preparedness because pressure is building in every country studied and is likely to increase with dozens of countries set to have elections in 2024. It means scaling assistance to provide collective resources, common infrastructure, and coordinated strategies that create a scaffold for learning and addressing the myriad individual needs of each partner. And it requires mitigating financial precarity so that journalism is seen as a viable profession; so that media have the staff, expertise, and resources they need; and so they are better prepared to weather rising pressure and shifts in the information ecosystem that threaten to undermine the viability and relevance of journalism.

The needs and recommendations expressed by study participants are shaped by the political economy of media assistance, particularly the role of tech platforms, global markets, US and European policies, and global advertisers. Media assistance must explicitly consider not only domestic markets but also the global platform economy and how macroeconomic conditions influence the viability of different business models and revenue options.

Media sustainability is highly contextual, and each outlet needs to find its own business model. There is no single national or sectoral solution, although a set of crosscutting approaches are detailed in Appendix B. While donors and development organizations may find this daunting, media do not develop into sustainable organizations without appropriate resources and capabilities, especially where the local enabling environment is deteriorating or non-existent. Accepting that some media will probably never achieve financial viability, including exiled media and those serving highly repressive countries, and that public interest media have rarely been sustainable businesses even in wealthy democracies may be difficult. But this paper shows that this is the reality and underscores the importance of strategies for supporting non-profit newsrooms.

While the number one request by study participants was for more core funding, the needs of these independent public interest media and journalists have evolved in tandem with a more diverse threat landscape and the opportunities and constraints created by platforms. As such, the traditional approach of providing subgrants for discrete project funding to local partners and supporting media training without enlisting the support of the diplomatic and policymaking communities is insufficient to meet these challenges and unlikely to support media viability or sustainability. Furthermore, country-based funding must evolve amidst the

increasing importance of transnational media, journalism, infrastructure, and collaborations.

The multifaceted needs and structural constraints within which independent and public service-oriented media work require the media assistance community to take a holistic approach to supporting these partners that includes the provision of money, technical assistance and collaborative strategic programming and advocacy, while also improving the global enabling environment. This means addressing the role that US and European policies play in the global information ecosystem and adopting a more comprehensive approach to foreign assistance that includes domestic immigration and technology policy support.

It requires improving platform content moderation systems to better protect and prevent these independent media from being erroneously targeted; improving immigration systems to enable journalists and media to relocate and continue in journalism; and building common infrastructure that will allow media to address legal registration and financial challenges. Study participants also need the media assistance community to improve learning, data collection and sharing so that they can develop tailored business plans and capacity building that will allow media to weather rising pressure and remain viable in the platform era.

The media assistance community must figure out how to enlist the support of the diplomatic and policymaking communities to provide more meaningful, if politically difficult, support. The status quo is insufficient to meet these challenges and unlikely to support what media and journalists need to be viable or sustainable in the medium to long term.

Without bold strategies, more money, and a collective infrastructure for research and development, independent public service media could wither away in many countries. The resulting news deserts will mean a less informed public, less accountable people in power, and less democratic governance.

About the Author

Dr. Courtney C. Radsch is an internationally recognized expert on technology, media, and human rights whose perspective is shaped by her experience as a journalist, scholar, and press freedom advocate. Currently she is a fellow at the UCLA Institute for Technology, Law and Policy and a strategic advisor for mission-driven media development and human rights organizations including ARTICLE 19, the Global Forum for Media Development (GFMD), the International Women's Media Foundation (IWMF), and the OSCE. She has worked for over a decade in the press freedom and media development fields and prior to that as a journalist in the Middle East and United States. This work is informed by two decades working with journalists and media organizations around the world, including several years as the Advocacy Director at the Committee to Protect Journalists. It is grounded in scholarship based on a commitment to empirical, human-centered, feminist research that has centered on the Majority World, often referred to as the Global South, the developing world, and a host of other terminology that is defined by Global North. She is the author of Cyberactivisim and Citizen Journalism in Egypt: Digital Dissidence and Political Change (Palgrave Macmillan 2016) and regularly publishes and offers commentary and analysis in top media outlets.

Suggested Citation: Radsch, Courtney C. "URGENT: Understanding and Responding to Global Emerging News Threats." Internews, March 2023.



Introduction

Understanding and responding to global emerging news threats has never been more urgent, and this report lays out why and what can be done to address them.

The global COVID-19 pandemic intensified a decade of pervasive democratic erosion and closing civic space. 2021 saw a record six coups, five times the average, including the overthrow of elected governments in Afghanistan and Myanmar, followed quickly by the 2022 Russian invasion of Ukraine. These crises prompted an unprecedented exodus of journalists and demolished a decade of gains in many media sectors.

This forced migration of the world's information providers comes amid a steady rise in populist authoritarianism that has seen the number of democracies plummet as electoral autocracies increase. These are now the most common regime type globally. As civic space closes, pressure on independent media builds and journalism becomes more hazardous, meaning that the press in nearly every country is having to adapt to information ecosystems that are under stress, and must prepare accordingly. According to V-Dem, last year a record 35 counties experienced serious deteriorations in freedom of expression propelled by government, with civil society repression and media censorship worsening in more than 20 autocratizing countries.²

The 96 journalists, media practitioners and editors who were interviewed or took part in validation sessions for this study observed that pressure on independent media is building around the world and in every country they work in. A quarter of the 176 survey respondents

reported self-censoring at least sometimes and the prevalence of state-aligned information operations threatens to further muzzle independent media. Intensified harassment on and offline, violence, and record levels of imprisonment have accompanied new laws restricting or criminalizing independent reporting that are fueled by increasingly



Papers on display a day after Myanmar's military detained the de facto leader Aung San Suu Kyi and president in a coup. Photo: Aung Kyaw Htet / SOPA Images/Sipa USA

sophisticated surveillance technology and spyware, impunity for brazen acts of domestic repression, and transnational authoritarianism.

But it's not just these regressive conditions that undermine media freedom and sustainability. Journalists describe how traditional censorship is exacerbated by the intermediation of tech platforms in the journalistic process and the failure of American and European policymakers to address how their legal regulatory system affects the enabling environment for digital news media abroad. Online violence and harassment, particularly against women and minorities, has become endemic to the practice of journalism and is intensified by state-aligned influence operations. Political actors pour extensive resources into influence campaigns, spyware, and network shutdowns that distort information ecosystems, drown out legitimate reporting, and undermine elections. Disinformation is not just a growing threat to democracy and public health; it also poses a threat to the journalists and media outlets who report on it. And while factchecking is a growth area for journalism that addresses part of the disinformation dynamic, it is insufficient to grapple with cross-platform propaganda, especially by political leaders, or the shortcomings of content moderation systems.

These myriad threats are compounded by precarious business models that have yet to adapt at scale to the decoupling of advertising from publishing and a technologically inflected information ecosystem in which journalism must compete with content producers who play to the algorithm rather than journalistic standards. Meanwhile, regulators are trying to address the power of Big Tech on the one hand while largely overlooking how to improve content moderation systems or fix loopholes in their own privacy and copyright frameworks that allow content farms to flourish and malign actors to weaponize these laws against independent journalists around the world.

"The media development community doesn't seem to have realized so far that the world has changed, you know, that we are in a really, really terrible time that we are living through that threatens the existence of, of independent media, in many in many countries," said a study participant in a South Asian country where pressure is building.

The needs of independent public interest media and journalists around the world have evolved as the threat landscape has become more diverse and populations have shifted. So, too, have their needs. As such, the traditional approach of providing subgrants for discrete project funding to local partners and supporting media training in-country without also enlisting the support of the diplomatic and policymaking communities in those countries which advocate for independent media is insufficient to meet these challenges and unlikely to support media

viability or sustainability.

Despite these dire conditions, news outlets are working to serve their communities, hold power accountable, and inform the public. Journalism is in an era of collaboration and the desire for solidarity is both an overarching and underlying need identified by journalists and media outlets in all contexts. Although media development assistance remains primarily country-focused, the issues, audiences, and infrastructure for modern journalism are increasingly transnational. A recurring refrain from journalists was their interest in expanding collaborations and support for networked journalism at the local, regional, and transnational levels. Indeed, exiled media are inherently transnational. And they are thus almost fully reliant on tech platforms.

Media have constrained choice sets when it comes to the platforms they use and the business models they develop. This report explicitly addresses the way these choices are shaped by global tech platforms, global financial and currency markets, US and European policies, and advertisers, which are located in the countries providing media development assistance.

Platformatization is a defining feature of the contemporary information and communications ecosystem in which journalism and news are embedded and which shape their editorial and business strategies. Platformatization refers to the penetration of digital platforms and their economic, political, and infrastructural logic into the information ecosystem in ways that fundamentally affect the operations, business strategies, and editorial choices of the journalism field.³ In countries that restrict access to the airwaves, have high levels of government intervention in the media, and limit journalistic independence, social media and messaging platforms provide a precarious lifeline. These platforms "help smaller, independent media to grow so they now have a chance to also reach our audience without the big mainstream media in the capital," as an Indonesian journalist observed, and help others evade state-dominated media systems and censorship.

But they also bind these media to these platforms. They provide not just the audiences and the publishing platforms, but they also control much of the underlying digital advertising — or adtech — infrastructure, the artificial intelligence scaffolding that underpins digital content, as well as the tools and services that many journalists depend on to do their jobs.

News media must adapt to the technical requirements for each platform and the forcing function of algorithms while navigating the complex and evolving content moderation rules community standards and terms of service to ensure that they optimize engagement but do not violate the rules. The moderation systems imposed by these "content cartels" determine the

visibility of content, and by extension, the viability of news media. They are especially pivotal during crisis. The COVID-19 pandemic, a crisis in its own right, reinforced the platformatization of journalism, further entrenching Meta and Google as the "integral and inescapable" infrastructure of contemporary journalism in the Majority World.⁴

The COVID-19 Crisis and Pressure Produced by the Pandemic

Although the pandemic did not turn into an extinction event for journalism, thousands of media outlets around the world went out of business or transitioned to digital-only, restructured their operations, and let go staff and freelancers as their advertising and revenue plummeted.⁵ Journalists had to adapt to restrictions on movement and in-person interactions, with freelancers particularly hard hit, and forced them to develop new ways of working.

The pandemic provided cover to governments around the world to adopt repressive legislation, impose new surveillance regimes, and ramp up censorship and influence operations. And it gave officials an excuse to curb independent journalism and restrict access to information and their engagement with the press, said journalists. As government enacted emergency powers and new laws governing disinformation, tech platforms began aggressively moderating content, setting a precedent for more, better, and faster content moderation. Several reports have extensively covered the pandemic's impacts on the media and this study did not seek to duplicate those. Rather this report underscores how the pandemic increased the pressure that journalists and independent public interest media work under. Most people interviewed for this study described a slow return or adaptation to a new normal that includes a tighter market, a bigger focus on factchecking amid a rise in influence operations, and more challenging legal regulatory and technological conditions.

This global health crisis triggered many of the same needs as other types of crises and crystalized the need for preparedness and flexibility, while also forcing media to adapt in ways that can be helpful in other pivotal situations. "In terms of remote working, we are building on our learning from Covid times," noted a Ukrainian journalist speaking about the way dislocated media adapted to continue working despite the war.

The pandemic is still very much present, even if having receded into the background. Journalists described how the pandemic further accentuated the precarity of the journalism profession and media industry even as it underscored its vital importance and crystalized the need for preparation and flexibility when it comes to journalism and the media business.

Methodology

General Approach to the Study

This study is based on a mixed-method approach including a range of qualitative and quantitative methodologies: a desk review, qualitative semi-structured and unstructured interviews, ethnographic participation, and a quantitative survey. The aim of this design was to gather perspectives from journalists and professionals who work in independent media through first-hand and reported observation and analysis as well as the range of insights, needs, and recommendations they identified to others in the media development community since the pandemic as reflected in a range of reports and assessments. The report draws on the experience of its author and complimentary studies she conducted during the period of study as well as events organized with journalists and media leaders that specifically examined topics in this report. A mixed-method approach increased the rigor of the findings by combining the context-specific and in-depth account of qualitative methods with general observations and trends of quantitative methods. Two validation sessions with 21 journalists and experts from the media development community were held to triangulate the findings and gather additional input.

Conceptualizing Indicators for the Field

- Media Development Index (UNESCO)
- Media Suitability Index (IREX)
- Media Sustainability Barometer (FPU)
- Media Viability initiative & Media Viability Indicators (DW)

This study does not appear in a vacuum. It specifically draws on first-hand insights and the resulting recommendations from several recent qualitative studies and assessments based on the views of journalists and media organizations themselves, as well as broader analyses that provide important context about the socioeconomic and technopolitical factors affecting news media sustainability.⁹

At the centre of this study lie the accounts and experiences of journalists and professionals who work in independent media, so its aim is to understand the challenges and needs from the informant's perspective. This assumes a dynamic and negotiated reality that is interpreted

by its social actors, and is acknowledged in the way this paper is written up: contextual information on the analytical categories, for example, is derived from a review of the literature produced by scholars and practitioners, but primarily from the first-hand accounts of study participants. Hence, context and findings are often interwo-



ven and blurred in the report. Drawing a hard line between what is fact and what is finding cannot be done without losing nuance and complexity, as it is precisely participants' interpretations of their context that materialize as constraints and structure upon them with real-life consequences, but it is also through which their agency is acknowledged, as it allows them to identify areas of support they need.

Case Selection Strategy

To answer the overarching question of how to better support independent media in challenging contexts, this research focused on the needs of media and journalists operating in three contexts characterized by intentional and opportunistic democratic erosion: 1) countries where pressure is building to 2) countries that have undergone a fast pivot to worsening situation or crisis; and 3) exiled journalists and migratory host countries. Nine priority countries for interviews were initially identified in order to anchor the research and to ensure it included the perspectives of journalists and media workers who had recently experienced a fast-pivot to worsening situation. Additional interviews were conducted beyond the priority countries to understand whether issues within one country context applied more broadly to that category of countries, including those with a regional view. Interviews took place with representatives from 22 countries, 14 of which fell into the most common category of pressure building. For this reason, the section on pressure building contains the most detail.

Moreover, study participants were not restricted to priority countries due to a combination of factors including whether the study would complement rather than duplicate other data collection efforts within the media support sector; the pre-existence of trusted networks

and relationships that facilitated the research; and the political situation in each country that affected data collection in early/mid 2022.

Country Contexts and their Features

1. Countries where pressure building is likely to include:

- Closing civic space through restrictions on freedom of association, assembly, and expression (including network shutdowns) undermining human rights
- Fiscal Harassment, such as foreign agent laws and restrictions on foreign funding
- Rising government antagonism with civil society, attacks on journalists and human rights defenders, weaponized influence operations targeting local populations
- Increased cyberattacks, surveillance, and use of spyware targeting civil society, including journalists

2. The fast pivot to worsening situation is likely to include:

- Heightened legal threats
- Heightened physical and digital safety threats from both government actors and statealigned groups or individuals
- Economic deterioration that decimates advertising, subscription, and other revenue sources
- Difficulty accessing global financial infrastructure and moving money
- Restrictions on foreign funding and heightened scrutiny of individual and organizational finances and partnerships

3. The exiled journalists and migratory hosts category may include:

- Arrival/influx of media workers leaving countries of origin or operation
- Lack of access to support for resettlement and continued work as a journalist
- Difficulty navigating new environment
- Host media sector under pressure, hostility to journalists
- Increased demand for news from country of origin
- Transnational repression

Data Collection

Data collection included a range of qualitative and quantitative methods from the social sciences and ethnography.

Desk Research

The author conducted a multifaceted review of the literature produced by scholars and practitioners that included country-specific and thematic reports, policy papers, academic studies, internal documents and communication, and primary documents from tech companies. It also included review and transcription of dozens of panels, interviews, podcasts, and events online featuring journalists from the three types of countries. Except for exiled media research, the reviewed focused primarily on recent information produced since 2020.¹²

Qualitative Interviews

Interviews were both semi-structured and unstructured to allow deep dives into journalists' experiences and to gain contextual knowledge from experts.

Interviews with journalists:

Semi-structured interviews with a purposive sample of 75 journalists, media founders and editors, 39 from priority countries with the remaining 36 from countries within the three categories. The interviews were conducted in English, French, and Spanish in 2022. Two validation sessions with 21 media professionals from priority countries were conducted in English and Spanish in late 2022. Study participants were chosen through a mixed approach of purposive sampling, convenience sampling and deliberate sampling.¹³ They were also representative of priority countries and the three contextual categories. A dozen interviews conducted with steering committee members of the Global Forum for Media Development (GFMD) at the end of 2021 also informed this research. Additional unstructured interviews were conducted at media-related conferences.

Key informant interviews

Interviews and discussions were held with key informants from the media development, press freedom, and journalist safety communities who work directly with journalists around the world, particularly exiled journalists, emergency assistance, and the recent crises in Afghanistan, Myanmar, and Ukraine. The primary aim of these semi-structured interviews was to gather information on cooperation and coordination mechanisms and validate observation, impressions, and findings.

Quantitative Survey

The aim of the survey was to reflect on dominant findings that materialized in the qualitative interviews, and to understand the wider significance of these results for a larger group of journalists. An online survey containing of 50 questions was designed and distributed

through purposeful sampling via email directly to over 600 media organizations working on the ground, and to a targeted group of 50 media contacts by media organizations working on media assistance or comprising journalists from aid recipient countries.¹⁴ It was not shared on social media. The survey generated a response rate of 176 individual responses¹⁵ (60% men, 38% women, 2% preferred not to disclose gender).¹⁶

Participation and Auto-Ethnographic Study

The author attended and organized events and conferences with journalists and media professionals that focused on the issues in this report and roundtables she organized at the Center for Media at Risk related to media and the <u>Afghanistan</u> and <u>Ukraine</u> crises as well as several panel discussion related to platforms and media regulation.¹⁷ She was included in several coordination groups that responded to those two crises. The analysis is also informed by her experience working for the Committee to Protect Journalists, as an advisor for several media support and human rights groups, and as a participant in multistakeholder initiatives that provide opportunities to hear directly from journalists and civil society around the world.¹⁸ The value of situating and reflecting on one's own experiences within the context of crisis response, journalist assistance, coordination, and the like provided another analytical tool for data collection and analysis.¹⁹

Ethical Considerations and Safety of Participants

This research adopted a duty of care principle with respect to identifying interviewees, focus group and survey participants, meaning that they were provided with a description of the research and an informed consent form in which they were asked to provide their preferred level of attribution.²⁰ Interviewees were then asked verbally at the outset of the interview and again at the conclusion about their preferred attribution, and all participants were informed of their right to change this designation as well as to indicate specific parts of the interview that were on background or off the record. However, because of the dynamics in some media markets and to ensure the safety and level of desired anonymity for other participants, the author adopted additional anonymization through the removal of all proper names.

Data Analysis

The analysis of the qualitative data relied on thematic narrative analysis and finding trends and patterns across the countries and categories. The quantitative data analysis relied on descriptive statistics and examined how findings from the qualitative data analysis apply to an additional sample of journalists.

Limitations of Study

This research was wide-ranging and sought to cover complex issues in a range of contexts but was necessarily limited by the number of participants included and the depth that could be achieved on any one topic, many of which could be stand-alone reports in their own right.²¹ It primarily focused on understanding needs and recommendations and is therefore less about what is working or positive perspectives since it is a needs-based analysis.

Study participants were often already in the general orbit of the global media development community, likely over representing media that receive donor support. Many were existing or previous partners of Internews, which helped select and set up many of the interviews and distribute the survey.²² Limits on the number of interviews conducted and survey respondents and how they were selected means a level of extrapolation and generalization was necessary. Interviews were primarily conducted remotely²³ and the survey was digital, meaning respondents needed good internet connectivity. The survey was deliberately targeted to trusted partners and networks both because of the sensitivity of questions asked and to avoid trolling and irrelevant respondents; it did not seek or achieve a representative sample. The low numbers of journalists who responded from any specific country context was limited, and some home countries were overrepresented, such as Myanmar, while others were entirely absent. Ukraine was identified as a priority country for interviews, but it was difficult to connect with local media before the end of the year due to their other priorities, and there was limited responsiveness from potential Tunisian participants. Drawing broad, definitive conclusions about any specific country or group of journalists, for example gender dynamics, would not be warranted, however this research highlights key needs which are apparent in more than one country in a given context and referenced by a number of individuals in the same group, and therefore demand attention.

Characteristics of the Study Participants

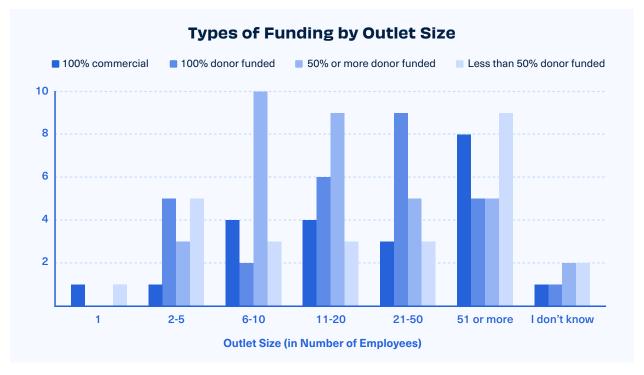
Those participants in the study who identified as media practitioners came from all types of media organizations, from fully commercial to community supported to funded by donor governments, philanthropy or private companies and everything in between, including freelance, staff and volunteers.²⁴ 27% of survey respondents are 50% or more donor funded, with about a quarter of survey respondents completely reliant. Most exiled media and outlets working in

countries that have experienced a fast pivot to worsening situation rely significantly on donor funding, although they can sometimes supplement this with additional income generated from diaspora or international audiences, according to interviews. Some of them were quite new though a plurality had been in operation since the dawn of the social media era more than 16 years ago.



Figure 1. Types of Funding Reported by Survey Respondents (176 total survey respondents)²⁵





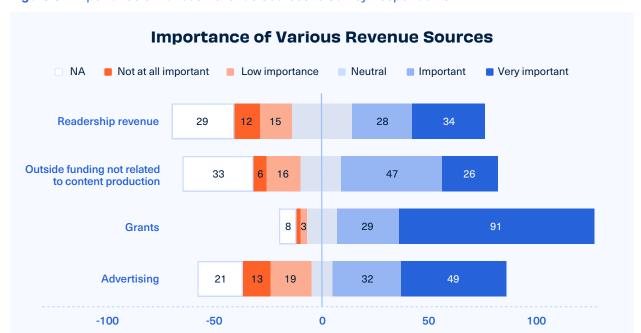


Figure 3. Importance of Various Revenue Sources to Survey Respondents

Of all survey respondents, 27% indicate that they were 50% or more donor funded, 23% say they were 100% donor funded, while 24% say they were 100% commercially funded. More than a third of survey respondents with more than a decade of experience reported working for outlets that are fully or at least 50% funded by donors, whereas just over 10% said they were 100% commercially funded. Sources of commercial revenues include digital advertising on their own website or social media platforms, traditional advertising, government advertising, and reader revenue such as subscriptions, crowdfunding, and special products. Larger media outlets with more than 50 employers were more likely to be 100% commercially funded or receive less than half of their funding from donors. Just 10% of those surveyed reported receiving financial support from any of the social media platforms, with slightly more from Google than Facebook.

Digital advertising is an important source of overall revenue to just over half of survey respondents and interview respondents, although interviews indicated that many outlets are not taking full advantage of the news-focused products and opportunities offered by Google and Meta. For most surveyed outlets, advertising on social media outstrips the importance of native website or traditional advertising.

The language of publication is an under appreciated factor impacting media sustainability and the viability of specific business models as well as the way in which donor priorities and platform dynamics are translated into a need to publish in English. According to the survey,

most outlets publish some content in English, particularly outlets with on and offline products, nationally-oriented outlets, and journalists working in exile. "Although I would love to be able to write in Spanish, the financial situation does not give me an alternative," explained a free-lance journalist who works outside of the capital in Mexico. The most popular platforms are unsurprisingly Facebook and Twitter, and most of the outlets that reported receiving financial support from social media platforms said they publish at least some of their content in English.

Pressure Building

The indicators of closing civic space and rising repression as outlined in the introduction are well-known and documented by myriad organizations. Amid a deteriorating enabling environment there is an urgent need to better understand what media outlets and local journalists, including freelancers, need to prepare and build resiliency.

Local monitoring groups and professional associations are crucial sources of information, solidarity, and advocacy when pressure is rising. Journalists said they need support and solidarity to push back against laws and regulations that tighten the space for free expression and association on and offline, impose criminal or excessive civil penalties for speech, restrict foreign funding, and delegitimize independent journalism, often under the guise of combatting terrorism or disinformation. Even in draft form such laws have a chilling effect.

Administrative and fiscal harassment seem to have become more common because they tend to garner less attention, monitoring, and outrage than murders or imprisonment, say journalists. Study participants from Indonesia, Mexico, Thailand, and Tunisia said their govern-

ments were considering or had recently adopted new legislation that contained problematic provisions such as constitutional abrogations or heavy penalties for online speech. "Now what we need is solidarity and support from not only from media, journalists, but also from CSOs so we can work together to stave off democracy regression," said a media manager in Indonesia.



A protester being interviewed at an anti-government demonstration in the Thai capital. Credit: SOPA Images Limited/Alamy Live News

Journalists said that local press associations that had some degree of independence, such as the Press Council in Indonesia and the Syndicate of Journalists in Tunisia, and rights groups play an important role in raising awareness, coordinating consultation with the journalistic community, and advocating with the government. Despite shortcomings, the independence, professionalism, and resiliency of these institutions are helpful for influencing these processes even as pressure is building, said journalists in both countries.

The following section outlines in greater detail a set of challenges that are common when media feel pressure building. They are simultaneously signals, symptoms and drivers of increased pressure and are ideally tackled as they materialize and when the opportunity to do so may still be open. New threats will continue to emerge, but the different dimensions



of constriction typically include fiscal harassment and the introduction of more restrictive laws and regulations relating to independent media and civil society; economic pressure, precarity, volunteerism and decreased access to revenue streams like advertising; influence operations, online and physical harassment and surveillance, often including the weaponization of US and EU laws such as the Digital Millennium Copyright Act (DMCA) and the General Data Protection Regulation (GDPR) to censor media; the challenges posed by news deserts when media is concentrated in urban centers and capital cities.

Fiscal Harassment, such as foreign agent laws and restrictions on foreign funding, is a leading signal of closing space and sign that pressure is building and should trigger vigilance. While foreign agent laws can have legitimate purposes and may improve transparency and accountability when designed well and embedded in rule-of-law, they do the opposite when they are weaponized along with other restrictions on registration, licensing, and financing to harass and pressure media outlets. Study participants said the adverse impacts of fiscal harassment threaten their very viability as media organization in multiple ways: they threaten their safety; restrict their ability to register and raise money and thus the practicality of some business models; and harm their credibility with their audiences and sources. They can also provide cover for spurious charges of tax evasion or money laundering.²⁶

These types of laws also deter domestic advertisers and can send a chilling signal to subscribers

or members, resulting in a dual-pronged attack on revenue and the broader business model. This type of "fiscal harassment" and "fiscal erosion" are aimed at "making media disappear" said one journalist working in Latin America. "It seeks to annihilate civil society and independent media, which receive funds, and which have been classified as opposition by the ruling party." Even the specter of such laws can have a chilling effect. Journalists in El Salvador described a similar government offensive to outlaw independent media and to go after the people who run them.

A 2021 draft foreign agents bill in El Salvador directly targeted independent media receiving support from international donors. It would require people and organizations that receive funding from abroad to register with the Interior Ministry, impose massive taxes on their transactions, put their legal status at risk, and limit the activities they could engage in. The editor of one of the country's leading independent outlets urged the international community to maintain its pressure on the government even though the bill was pulled since it could be reintroduced and pass at any time.

In Mexico, government officials revealed confidential taxpayer information related to news outlets that receive external funding or development assistance, according to journalists interviewed. It has sought to stigmatize and delegitimize media and civil society organizations amid a "closure of democratic spaces," as one journalist put it. "It's part of the narrative and the persecution that this government is carrying out against the media and journalists, and we are concerned that this may also be a reality for us in the medium term." Elsewhere, like Thailand where the effects of the 2014 coup continue to be felt by the media, the government has exerted indirect pressure on media through donor organizations, said a study participant whose organization lost funding when its donor pulled support for fear of being unable to legally register itself in the country.

These laws appear aimed at least in part to influence public opinion and do not help improve historic levels of distrust in media. ²⁷ Officials and their allies perpetuate narratives that undermine the media, including allegations that they receive millions of dollars or euros to attack the government, explained a media professional who works with feminist media organizations, most of which are financed through global funds that support gender-focused work. "And that has generated, especially in social terms, an uphill climb for organizations to explain," said the head of a feminist media outlet in Mexico. Such smears and attacks are common components of state-aligned harassment and propaganda campaigns in pressure building contexts.

Information Operations: Online Harassment, Spyware, Propaganda and MDMs

The rise in influence operations oriented domestically has increased recently, putting pressure on journalists and political systems even as they draw media into geopolitical conflicts.²⁸ Influence operations is a collective term for contemporary propaganda, disinformation, and online harassment campaigns that leverage the design of information communication technology platforms and the Al-fueled content moderation systems that undergird social media to shape public opinion.

Online harassment is increasingly ubiquitous, intensifying as part of building pressure on the media, making it more difficult for journalists to do their jobs or earn revenue from online advertising. It is fueled in part by spyware that enables hacking and surveillance of targets. More than half of interview participants mentioned concerns about spyware, singling out Pegasus in particular, which bypasses phone security to gain full access to a device and has reportedly been used to target at least 180 journalists worldwide including in Mexico, Thailand, and at the global news outlet Al Jazeera.²⁹ In El Salvador alone, 22 reporters for a leading publication investigating government corruption and gang links found Pegasus installed on their phones in 2022.³⁰

State actors and political parties increasingly leverage the multimillion-dollar public relations, reputation management, and political consulting industries as well as democratic legal regimes to get coverage removed, intimidate journalists, and render news sites inoperable.³¹ As the director of a regional network focused on freedom of expression observed, "the biggest challenge is coming from digital repression, or what we sometimes call technological operations, in the form of weaponization of information" by those in power.

Meanwhile, economically motivated operations run by fake news and content farms drain potential digital advertising revenue from legitimate news outlets.³² News websites lose millions in revenue "to click-bait ad farm sites that spread hyper-sensational, misleading, and sometimes outright false news" because those hyper-polemic stories received higher rates of traffic than reported news stories.³³ Google and Facebook's ad businesses fuel billions in revenue for such sites,³⁴ yet several study participants said they struggle to make more than token amounts on these same platforms. "We are not even making \$100 a month on social media," said an ethnic media outlet in Myanmar.

Online harassment is pervasive and endemic in the journalism field and should be considered a hazard of the job, with an increase in state-aligned harassment indicative of

closing civic space and rising pressure on independent media. This is particularly true for high-profile journalists and those who cover controversial topics, women journalists, minority journalists (whether religious, ethnic, living with a disability, or otherwise), exiled journalists, and countries where the pressure is building. When study participants were asked who the main perpetrators behind online harassment were in pressure building contexts, several said they suspected their own government. "If a good journalist is reporting something, they can expect to be attacked by a lot of bots, and also their smartphones will be attacked and some of them will be doxed," said a factchecker, who believes their government is the primary perpetrator, underscoring the fact that harassment campaigns typically incorporate several tactics. Published research and reporting have also clearly established that many governments and state actors regularly engage in targeted online harassment of journalists. When these attacks become particularly vitriolic and targeted at specific journalists or media outlets it is a clear indication of rising pressure and danger to the individual journalist, and legal frameworks are often lacking or unhelpful when attacks are aligned with state or government actors.

The fact that women journalists are disproportionately targets of online abuse is by now well-established, ³⁷ as is the fact that such harassment often includes sexualized threats and attacks and is even more acute for women of color and minorities. ³⁸ Most journalists interviewed said that they just deal with it, though a few said that they have considered leaving the profession. Given how poorly remunerated and high-pressure journalism is in these contexts, the potential for deterring a future generation of passion-driven professionals should be cause for concern.

Despite nearly a decade of evidence about the prevalence of online harassment, journalists say that legal frameworks to address it are lacking in most jurisdictions, and that when the government is involved there is little recourse to be found in going to law enforcement even if there were relevant laws. Social media platforms and messaging apps remain the key vectors for these censorial campaigns but are equally inaccessible and provide little to no recourse, said study participants.

Journalists want better digital security training but also want the platforms to do more. Furthermore, the efficacy of individual responses to Strategic Influence Operations (SIOs) is inadequate and requires platform intervention to dismantle the networks that use their platforms. This research echoes the findings of other studies that emphasize



Guardian newspaper article detailing an investigation that revealed regimes using cyber-surveillance spyware to target journalists.

the need to go beyond looking at just individual-level solutions for better prevention and protection.³⁹ There is only so much that any individual journalist or newsroom can do to protect themselves from state-aligned information operations, other than some digital hygiene and loss prevention measures.⁴⁰

Influence operations leverage platform content moderation systems to drown out and delegitimize real news and are a growing threat to independent media in every country and transnationally. Meta said that two-thirds of all influence operations it disrupted focused at least in part on domestic audiences.⁴¹ For example, the military junta in Myanmar used Facebook as a "tool for ethnic cleansing," according to the UN, and Ethiopia appeared to be on the same path. Journalists interviewed similarly said that their governments were the primary purveyors of propaganda and disinformation. SIOs are also increasingly common during elections, according to study participants and experts.⁴²

Common tactics targeting media include overwhelming social media posts in pro-government comments, posting disinformation, and manipulating engagement and content moderation algorithms. "Sometimes they [officials] publish false information on their Facebook page, so they are still the *official* sources, but they are not the *credible* sources for information," noted a one factchecker, one of many who highlighted the challenge posed by official government disinformation. Sometimes, official accounts directly control fake assets without any obfuscation. But as a former Facebook data scientist wrote in a scathing memo before she quit, the company "simply didn't care enough to stop them."⁴³

Weaponizing US and EU Laws Abroad

SIOs inadvertently get help from US and EU laws aimed at addressing mitigating online harms and enhancing individual privacy and intellectual property rights that have ended up censoring independent news media and deterring investigative reporting. Journalists and outlets who cover information operations and investigative journalists critical of those in power are particularly at risk, according to interviews and analysis.

The US Digital Millennium Copyright Act (DMCA), created to crack down on digital piracy, has been deployed to force independent news stations in more than two dozen countries off the internet, despite the fair use provisions that should have protected them.⁴⁴ The EU's General Data Protection Regulation (GDPR) and Right to be Forgotten have similarly been weaponized to force news media to close down and prompt news sites to cut off access to their articles.

State-affiliated media, governments, and troll farms leverage these US and EU laws to shut down

independent, internet-based media around the world and to restrict reporting on corruption.⁴⁵ For example, authorities in several European countries, including those with poor press freedom records, have weaponized the GDPR to censor independent investigative reporting. Data Protection Authorities in Hungary, Lithuania, and Romania have all tried to muzzle investigative reporting and dismantle the tools they use to conduct investigative reporting.⁴⁶

More than 30% of survey respondents said they'd received DMCA takedown notices, a third of those had verified accounts. Journalists say these legalistic notices, which are only in English, are intimidating and despite their right to appeal, very few interviewees said they were able to do so unless they were supported by an international organization with expertise and contacts at the platform.

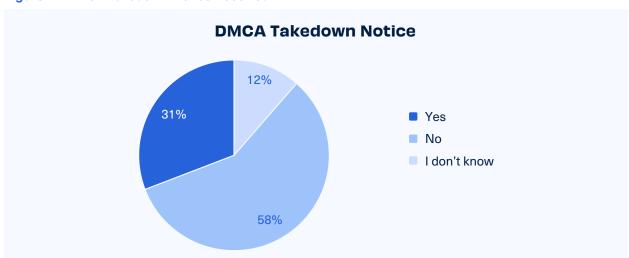


Figure 4. DMCA Takedown Notice Received

An analysis of Spanish-language news sites targeted through copyright abuse by the Colombian news outlet *La Silla Vacía* found that smaller or less well-known news sites and blogs were more likely to remove targeted content than larger outlets.⁴⁷ Articles about cartels, narcotrafficking, money laundering, medical malpractice, and corrupt business practices were among the journalistic articles targeted by these censorship campaigns, many of which remained offline after being targeted. The investigation found that several of the articles targeted with copyright claims had *previously* been flagged for removal by a reputation management firm based in Spain that had tried unsuccessfully to get them removed under the Right to be Forgotten. This new form of "forum shopping" is problematic and expensive for independent media who have limited access to legal expertise or support for pushing back.

The automation and aggregation of removal notices — some requests include hundreds or thousands of URLs — coupled with lax enforcement of penalties for fraud related to counterfeit

claims have allowed attacks on independent media to continue with impunity. There is no accounting of the costs incurred to comply with an increasingly complex web of laws while defending against their weaponization, though journalists and publishers indicate that they can be substantial. "When you are an independent media outlet...your resources are very, very limited. And you're running a very lean organization," said the CEO of a citizen journalism outlet which focuses on corruption, political misconduct, and human rights abuses in Nigeria. Its journalists have faced imprisonment, legal and administrative cyberattacks, surveillance and other threats in retaliation for their reporting, and despite designing its news operations to mitigate transnational repression by establishing a US presence and hosting the website on secret, hidden servers, a falsified DMCA notice that was sent to their hosting service succeeded in shutting down the site temporarily. "When you talk about the impact, we reach about 20 million people a month across our platforms," she explained. "And all of a sudden, we went dark and instantly, we could not publish, we couldn't figure out why." She said they had to rely on a constellation of international journalism support groups to regain access.

Although the DMCA holds those who issue materially false takedown notices liable for damages, it can be difficult, if not impossible, for affected news outlets to seek recourse. And platforms are not incentivized, much less required, to spend the resources or provide the independent oversight needed to ensure that there is less manipulation. The costs related to fighting these efforts are prohibitive, say journalists, and even filing a counter notice requires legal expertise and familiarity with US law, in addition to English-language skills. Many news organizations just end up complying with erroneous notices.

Weaponizing these laws against news media turns them into tools of repression that contradict broader development and geopolitical goals. Poorly designed and implemented techno legal regimes empower wealthy and powerful individuals to intimidate and coerce the media into removing legitimate coverage. They become essential tools in the arsenal of public relations and reputation management firms that conduct influence operations around the world, to the detriment of press freedom and the fight against disinformation, violence, and corruption.

Factchecking: A Partial Response

Factchecking has emerged as a key response to mis-, dis-, and mal-information (MDM)⁵⁰ and a funding priority for donors and platforms alike, which has seen hundreds of media and factchecking organizations emerge to respond to this growth sector. About 40% of survey respondents and several interviewees reported investing in additional staff or developing special projects around factchecking within the past year, with slightly more than half of them funded or requested by a donor and more than a quarter by a tech platform. In El Salvador,

for example, many of the independent digital media and community radio have factchecking sections, and foreign governments are funding some projects related to information verification, according to study participants.

Factchecking is focused on social media, as several journalists pointed out, but messaging apps are seen as a potentially greater problem. Journalists who see factchecking as an important part of their work said that they would like to also focus on all media given the cross-platform spread of MDM. "I always think about having radio and TV programs in some of the major media outlets that will have much more reach instead of just being based on Facebook, YouTube, Twitter, and Telegram," explained a journalist in Africa whose coverage focuses on a country with less than 20% of the population online. He said he would like to train more fact checkers across the continent and develop partnerships with universities and communications organizations to strengthen the information ecosystem. Both donor and platform funding support are largely geared toward factchecking social media platforms, however.

Some transnational and multilingual factchecking collaborations that span the globe and coordinate regionally have emerged.⁵¹ About 14% of survey respondents and a handful of interviewees said they are part of the International Fact-Checking Network (IFCN), the global body that certifies and acts as a clearinghouse for factchecking initiatives. Several media and journalists interviewed said they are part of local or regional networks, and several would like to get IFCN certification, though they also indicated they would need support with the process.

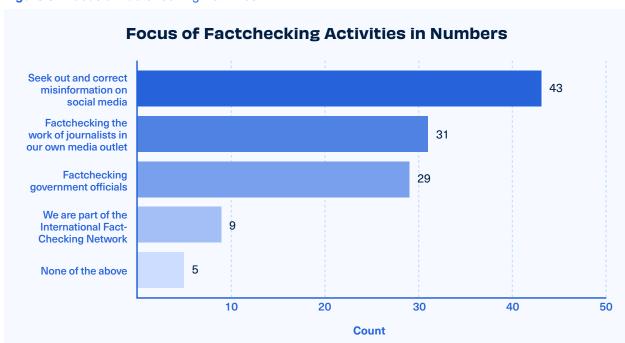


Figure 5. Focus of Factchecking Activities

Financial Precarity and Availability of Business Models and Revenue

Financial health helps news media withstand pressure, but media sustainability is highly contextual, and each outlet needs to find its own business model rather than taking a national or sectoral approach. While donors and development organizations may find this daunting, media do not develop into sustainable organizations without appropriate resources and capabili-

ties, especially where the local enabling environment is deteriorating or non-existent. The increased difficulty in finding sustainable business models in pressure building contexts as advertisers move away from local media and towards global social media platforms further weakens independent voices that are already under political strain. The erosion of the fourth estate may preempt and precip-



Sign seen at a protest against the Hungarian government for using Pegasus spyware to monitor journalists, opposition leaders and activists. Credit: REUTERS/Marton Monus

itate a fast-pivot to worsening situation.

Underlying financial infrastructure and access to financial gateways, like credit, payment processing and exchangeable currency, are foundational to sustainable business models.

Highly fluctuating currency and its exchangeability makes monetizing online platforms or implementing digital advertising or subscription/membership models difficult or impossible. Platform economics are related to global not local markets, as one journalist pointed out, and the lack of credit card processing infrastructure or non-exchangeable currency can mean that advertising on Facebook and Google, using crowdfunding platforms, or implementing certain subscription schemes is not an option. A journalist in Latin America pointed to the need for donors to give greater thought to *how* and *how often* they disburse payments to account for currency fluctuations that static budgets can't account for, yet which affect the delivery of programmatic objectives.

Most independent media outlets have limited timelines for financial security, and the vast majority in all contexts who receive donor support survive on project funding rather than

core support. This makes it hard to hire and invest in organizational development, security and preparedness and makes them susceptible to donor influence and priorities. And it reinforces a reliance on unpaid labor or requires the organization to subsidize the project, though this is often unacknowledged and unappreciated. As a Colombian journalist explained, "communities almost always have to adjust to the dynamics of the donor, which have a very broad focus on results, on products, on deliverables," rather than on process, which can be essential to building trust with local communities, or the needs of those communities.⁵²

Furthermore, project funds are often insufficient to cover basic expenses much less the safer or more efficient options, say journalists. This negatively impacts women journalists in particular, because it may limit their ability or willingness to work in certain areas or cover specific stories and becomes even more relevant as pressure on independent journalism rises. "It is very frustrating that we are at the forefront of very important stories, but nobody really listens to the needs of those of us who are here on a daily basis," said a female journalist working in Mexico, one of the world's most deadly countries for journalists but also one where street violence poses as much of a risk, she said, explaining her frustration trying to fund a more expensive travel option that she felt would be safer. In areas with high levels of general street violence, women journalists and freelancers said they needed to consider using private cars over public transportation. And the risk of losing equipment and the expense that would impose while rendering them unable to work, in the case of one photographer, affects where they work and which stories they may be able to tell. It's also one reason they often work together and in collaboration.

News Deserts

News deserts are pervasive and common in all types of media systems and public interest media seek to fill these voids.⁵³ Desertification can be caused by a range of factors including:

- An over-emphasis on national, political news to the exclusion of information with a more direct link to and relationship with people's daily lives. News deserts are common in many countries, particularly those that are highly oriented around the capital city or where rising pressure from local authorities make independent journalism too difficult or dangerous.
- They reflect both national economic and historical dynamics as well as the legacy of international development priorities more broadly.
- In countries with poor or declining press freedom, news deserts are a result of the inability of journalists to work safely and for news outlets to even exist.

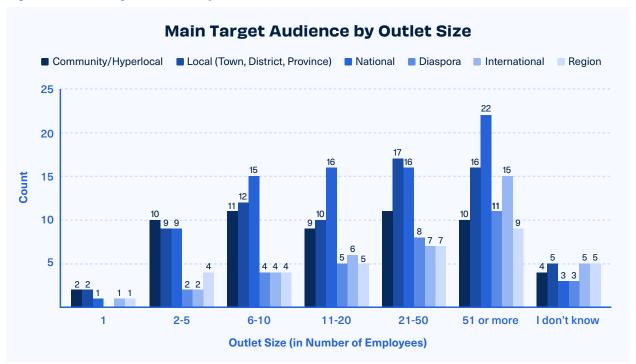
They can also emerge suddenly when rising pressure or a crisis forces news outlets to close or move to online only versions, or temporarily when a crisis includes network shutdowns that make it impossible for audiences to access news sources.

Many local, regional, and niche outlets were started because their founders wanted to cover the area where they lived, serve specific marginalized communities or perspectives because other media did not. Media professionals in those countries profess a desire to expand their coverage outside of the capital. "There is an information inequality in Indonesia," explained the founder of a new long-form public interest journalism outlet set up to disrupt the practice of capital-centric, male-centric news. While coverage of national politics is of course an important part of the news mix, "we are over indexed as an industry on political news," said the cofounder of Splice Media, which supports digital media startups in Asia. "You don't often come across people who wake up in the morning saying I want to make a better decision in the next election coming up."

Centralization can also make it difficult to develop advertising as a source of revenue for news organizations that serve regional or local audiences. As one local publication in northeast Thailand noted, "almost all the advertising in Thailand, not counting radio, is national. It's a national audience." El Salvador, a small country with a population of just 6.3 million, shares many of the same dynamics. "We are a small country with a very centralist approach, that what happens in the capital is what it is, like what happens in the country," said a long-time radio journalist. Business strategies need to take this into account.

Social media monetization can further exacerbate the dominance of national politics in the news agenda because such content has the potential to reach a wider audience and generate more monetizable engagement. Even local media in Indonesia end up covering Jakarta-centric news "because that's what gets you the clicks," said one editor. 7% of survey respondents identifying their target audience as community/hyperlocal and 6% of respondents identifying their target audience as local are working for outlets with five or fewer employees. However, larger outlets that are more likely to be able to access diversified and commercial revenue models were more likely to target national audiences, e.g. 20% have between 21 and 50 employees and 27% occupy 51 or more employees (see Figure 4). There's a tension between on the one hand needing to better understand and build an audience and monetize traffic and on the other hand providing accountability coverage or niche coverage, which serve smaller unrepresented portions of the audience. "For us, this is not a business... rather it is a medium in which we can do journalism from journalists and not from a business vision," said the editor and founder of an El Salvadorean outlet launched in 2014.

Figure 6. Main Target Audience by Outlet Size



A regional approach can help fill the news deserts created by domestic repression and the lack of independent media. One of Tunisia's investigative news outlets, for example, wants funding for major cross border investigations in neighboring countries that have censored their independent press, jailed their journalists, and tried to stamp out independent journalism while turning the remaining media into propaganda outlets. Tunisia is the only country in the region where independent media can operate at least somewhat independently, explained the founder, listing off the arrests of journalists in Morocco, the repression in Algeria and Libya, the harassment of one of Egypt's only independent outlets, and a score of limitations on journalism that make it virtually impossible for investigative media to operate in those countries. "We can write whatever we want," he said. At least for now. President Kais Saied is in the process of consolidating his power over the courts, dismantling political parties and women's rights, and weakening democratic institutions as he prepares to be reelected for another five-year term.⁵⁴

Registration and the Legal Framework

Navigating the legal, administrative, financial, and tax implications of registration bedevil independent media yet shapes their ability to access certain business models, revenue or funding streams, and their relationship to the administrative state. In countries with shrinking civic space, these issues can re-emerge as new laws or regulations are adopted that seek to restrict independent media, or through bureaucratic delay. Study participants said

they need support to understand the options available and how this choice will impact their ability to pursue different types of activities and revenue generation.

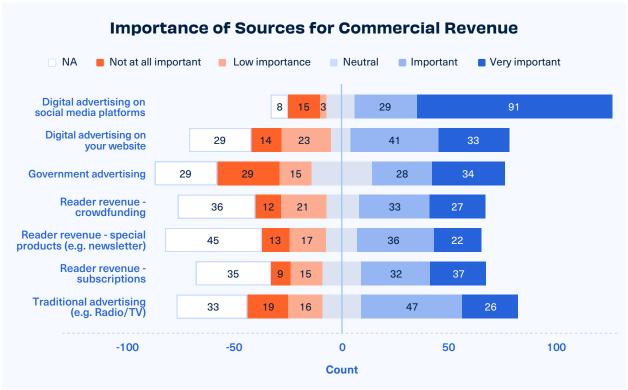
"The financial strategy of any media outlet will depend on whether it is a CSO or a company," said one Mexican journalist who established a media outlet focused on marginalized voices as a company in part because of a 2021 law regulating civil society activities. "International funders don't want to fund us, since we are a company," he explained, yet funding such journalism through business revenue alone is difficult. "We just became a foundation after three years of that process and that gives us the legal right to ask for donations," said a small Thai outlet. Similarly, networks, collectives or collaboratives without formal legal status often cannot accept donations or obtain funding from local governments or international donors, despite their growing importance. Legal status also affects a news organization's ability to access platform-specific benefits for the journalism community, such as the Google News Initiative or Facebook News Partnership.

Niche and community media, including migrant-focused or women-focused media outlets, are typically closer to the communities they serve and thus have greater access to the people who international organizations and donors often want to hear from or serve. But they may not be legally registered and thus unable to access funding. A journalist working with Afro indigenous communities in Colombia also underscored how legal status complicates the decentralization and decolonization of journalism. "We haven't been able to access resources or cooperation because our organizational form doesn't conform to the guidelines, so it's not easy to reach groups like ours and we always have to work through an intermediary," they explained, emphasizing how important it was for them to be able to generate resource to financially sustain their work or it would continue to be oriented exogenously.

Amid the well-documented trend of closing civic space, which is often accompanied by worsening economic conditions, journalists say it's time for the media development community to think more proactively about how to support these organizations without necessarily relying on legal administrative designations. Amid onerous registration processes for civil society and media organizations; restrictions on foreign funding, government subsidies or other types of revenue generation; and susceptibility to related administrative or judicial harassment related to their activities and funding, an extraterritorial solution may be needed. For example, study participants thought it would be a good idea for donors and the media development sector to explore setting up a global registration system that would allow media organizations to become eligible for international support regardless of domestic status.

Business Models and the Challenges of Revenue Generation

Figure 7. Importance of Sources for Commercial Revenue



Many media professionals said they do not feel that they are prepared or have the expertise to figure out the economics of sustainability. Few study participants had access to market research or audience studies, and there is a lack of these key business development resources focused on many Overseas Development Assistance (ODA) recipient countries. Several study participants said they lack expertise in how to use Google or Facebook Ads, Google Analytics, or other tools to measure and monitor traffic or monetize content. "Because we are a small newsroom, we focus on getting the news, and the reporting staff, all of that, and we have not focused yet on the how to optimize the platform," explained the founder of an outlet in Indonesia. The head of a digital media association in Asia, for example, estimated that more than half of small, local media do not have their own analytics teams and several study participants said they would like to receive support to make use of analytics and digital advertising more effectively. Others cited a lack of data from platforms that impedes their understanding about the link between traffic and revenue and puts them at a disadvantage when negotiating with platforms or developing business plans and reporting metrics. "We need access to data," observed a journalist in Central America. "It takes special expertise to publish and use social

media effectively, and many community, indigenous, and ethnic media working in broadcast find challenges to maintain the capacity of virtual broadcasting and social media publishing."

According to the brand safety adtech firm Zefr, "[w]alled garden platforms such as Meta (previously Facebook), Google, Amazon and the like have become increasingly attractive destinations for brand's ad dollars."⁵⁵ It predicted further growth and a shift in digital advertising to these platforms because of their "ability to leverage safe and compliant, secure first-party data to reach qualified users" amid the change in data privacy laws (like GDPR, CCPA) and phasing out of third-party cookies by Apple and Google.⁵⁶ However, the ability of advertisers to block their ads from appearing next to controversial content often ends up defunding news. Independent media need support navigating the evolving digital advertising space and putting their data to better use.

Administrative, technical, and business staff are all essential, yet often missing from small and digital native outlets in particular. Effectively monetizing social media and digital advertising depends on having the right staff and expertise on hand. Several interviewees said that they would like to hire more analytics, business, and administrative staff but lack the funding to pay existing staff much less to make new hires. These types of positions are also often not covered by project-focused grants, they said. Yet SembraMedia found that news startups in Asia, Africa and Latin America that had at least one dedicated sales or business development person on staff earned six to nine times more revenue than those who did not.⁵⁷ It also found that news organizations with a paid employee in charge of tech innovation had three times more revenue than those that did not.⁵⁸ Publishers have valuable first-party data that they need to make use of in order to attract advertising, yet many media outlets say they are unable to. Greater support for the business and operational side of media who see themselves as businesses is needed if they are to become sustainable.

Social media advertising often creates incentives misaligned with the production of quality and accountability journalism by reorienting news production toward traffic signals and perceived audience demands. Several journalists said that they felt that algorithmic intermediation has led to a decline in quality journalism and has led to an increase in sensationalism and focus on articles and headlines that will drive traffic and thereby increase revenue. "These platforms tend to give benefits to sensational clickbait kind of content, and we are seeing a decline in quality journalism because of this tendency in getting the most traffic for the media," explained a CEO of an Asian media group. His comments and other journalists interviewed echoed the findings of a study of African newsrooms that found that although many were quick to appropriate analytics and adapt their journalistic practices accordingly, a "slavery to

metrics" meant that stories with public interest value were often sacrificed for those that have high viral potential.⁵⁹ Journalists said they want to see more acknowledgment of this tradeoff by donors and more funding for non-profit journalism precisely to free journalists from the tyranny of the algorithm.

Business models based on advertising can be difficult to pursue in countries with high degrees of political parallelism or media capture when pressure is building, as well as in countries where people must use VPNs to access websites or social media platforms. In some ODA countries with a commercial advertising market, interviewees said a handful of larger, traditional media outlets dominate the market, and they see few opportunities outside of the capital or major urban centers, especially as political pressure on media rises. When the government controls, indirectly or directly, economic activity or essentially collapses the formal economy, there may be no safe way for independent media to generate revenue through advertising. Local businesses seem to have limited interest in advertising in media markets that are dominated by international corporations and donors or the government, said study participants. As pressure intensifies private advertisers don't want to risk getting on the wrong side of those in power by supporting independent media. These findings echo those of a report based on a dozen of national consultations which found that "[f]or media operating in very challenging press freedom environments there are few possibilities to generate commercial revenue." 60

For example, a Tunisian factchecker said an increasingly authoritarian president exerts pressure on the media indirectly. "He doesn't need to touch the media, the media do whatever they want," explained another media founder, but businesses don't want to get on the wrong side of the government by advertising with independent media. In Zambia, businesses who tried to advertise with a local media watchdog "immediately became targets of government, police intimidation and therefore withdrew from doing business" with them.⁶¹

Furthermore, often the populations that public interest media serve are more impoverished, rural, and less connected to the capital and the center of national news, making them unlikely to be of interest to advertisers or to have the capital to pay for news, as discussed further in the section on news-deserts. This is compounded by the challenge of monetizing digital traffic due to the size, language, and location of an outlet's audience; the need for technical expertise; and the intermediating role played largely by US tech platforms.

In countries where the internet is censored and people rely on circumvention technologies like VPNs to reach news or social media sites, outlets are unable to use analytics to understand

their audience or monetize traffic. Journalists from Belarus and Myanmar described how much of their audience must rely on VPNs to access their journalism, which also makes it difficult to report metrics on reach and impact to donors. In those cases, they say more qualitative measures of impact are needed (though these are more resource intensive to collect) along with an understanding of the limitations censorship puts on some revenue generating activities.

Government Subsidies and Advertising

Government and the state have a role to play in cultivating an enabling environment for journalism, specifically through the legal regulatory system, the provision of information, and the norms they create, several participants observed, though this can become more fraught with risk as pressure increases. In many countries the government is one of the largest advertisers in the media sector, and news organizations sometimes receive preferential taxation or subsidies. Those interviewed differed widely as to whether they think the government should provide more financial support to the media or just stay out of the way. Many media outlets do not want to take government funding, whether at the national or municipal level, because they want to maintain independence. But others think that they should receive some of the governmental benefits provided to news media in their countries, such as tax breaks, government advertising, and emergency support like that which was provided by some governments during the COVID-19 pandemic. The crux of the issue is how to insulate such benefits from exerting undue influence or leading to media capture, and how audiences would perceive recipients of such funding.

Nearly half of survey respondents classified government advertising as an important revenue source. Yet "the lack of clarity and transparency in the use of official advertising makes it much more complex to gain access," said a journalist founder about the situation in Mexico. "It has not been easy to access official advertising." In several countries state broadcasters

receive substantial government subsidies which journalist say can distort the market and create unfair competition conditions between private broadcasting operators and those affiliated with the state. Government advertising and subsidies are also wielded to keep the press in line where there are insufficient protections to prevent political interference in their allocation.



A journalist reads news on her phone at the Ukrainian-Polish border in Medyka, where many fleeing the war in Ukraine arrive. Credit: Kay Nietfeld/Alamy Live News

"You have mainstream media essentially beholden to the government because it's one of the biggest advertisers on mainstream media," said a Kenyan journalist. "And that means that they're not able to publish stories that are very critical of the government because they're afraid of some kind of backlash." Improving regulatory frameworks to insulate media from political interference or favoritism could be a helpful intervention in some countries.

Other Activities to Subsidize Journalism

A significant number of media outlets engage in activities other than journalism to serve the informational needs of their audience and support the editorial side of their business. In many cases journalists and editors are essentially subsidizing their salaries and journalistic reporting through other activities such as:

- providing services like training or consulting, curating events, producing paid content, or similar services.
- facilitating community programs such as debates or education projects, creating discussion spaces for community members and leaders.
- aligning their work with the project objectives of international organizations.

Live journalism, or what the Forum on Democracy refers to as "experiential income" appears to be a growing part of the revenue mix and a type of activity that an increasing number of outlets in countries where pressure is building are trying out. Live journalism refers to talks, gatherings, conferences or other events created or curated by news organizations and journalists that is available to members, or to the public for a fee, often with opportunities to directly engage with journalists, which has the benefit of increasing familiarity between members of the public and the profession. Splice Media has worked with its partners to understand what their specific audiences want, in one case finding that creating small, informal events that facilitate interaction and help audiences feel involved created new revenue opportunities. Study participants said that live journalism is a great way to connect with audiences, and several said they would like to do more experiential programming but would need administrative support and funding to do so.

The Precarity of Journalism as a Profession

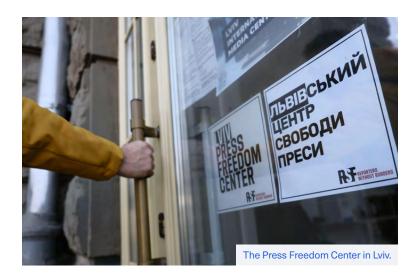
Journalism as a profession has become more precarious in countries where pressure is rising because of general safety concerns that come with the job and intensify as space closes, to its low salaries and reliance on volunteerism, the expectation that media professionals must

have a multi-faceted skillset, and the difficulty of retaining talent. Furthermore, as creator and influencer culture has taken hold, they are replacing journalists in electoral processes, observed journalists in Asia and Latin America. Some candidates refuse to grant interviews to journalists but will give them to supportive influencers, according to two study participants.⁶⁴

Volunteerism: Independent, public interest-oriented news outlets often begin as a passion project or volunteer effort, not a business endeavor, and struggle to evolve. Most founders come from a journalism background, with little or no experience or training in running a business, yet a media business needs more than just journalists and editorial staff to function. "The problem is that people working in independent journalism suddenly have to become micro- or medium-sized entrepreneurs, for which they are not prepared," explained a journalist working in an increasingly repressive country. "Those of us who are in journalism are doing it because we are outraged by what is happening around us and somehow we want something to change," he said, but when you start a media outlet "you suddenly stop doing journalism, which poses a risk for journalism and for the communities that we cover."

Often these media outlets are quite small with just a handful of staff, many of whom are not

adequately paid, and volunteers. More than 37% of survey respondents reported regularly using volunteer workers in the production of news. "We have to have another job to be able to survive," explained a community media journalist in Colombia. This limits the sustainability of these outlets both in terms of the capacity of founders to earn a living and to attract talent and cultivate the next generation of newsroom leaders.



Talent retention is challenging both in terms of paying a living wage as well as keeping on journalists who receive training or as they advance in their career. Earning a living wage with benefits by working in journalism, both staff and freelance, is a precondition for sustainability rather than mere survival. It also insulates the press when it is carrying out its role as a watchdog on those in power because it makes journalists less susceptible to "back of the envelope" journalism, observed a Kenyan journalist. Furthermore, as pressure mounts

it becomes harder to attract talent and deters some from entering the field. As a Tunisian journalist noted, parents don't want their children to go into journalism because it is not safe or sustainable.

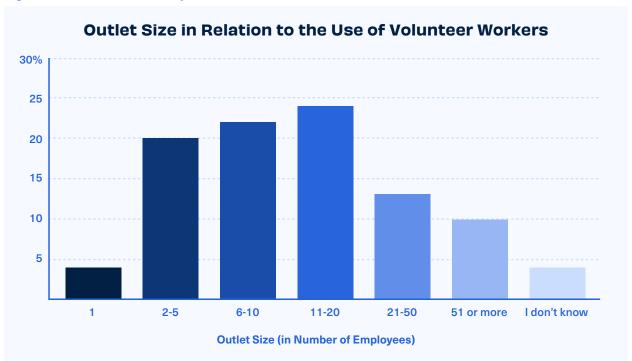


Figure 8. Use of Volunteers by Outlet Size

This is particularly problematic for niche, rural and critical media outlets, which have tiny budgets and limited opportunities for advancement. "Most of our journalists in the past got good and then they were gobbled up by Bangkok," said a journalist whose local media outlet serves northeast Thailand. "It often happens that very talented journalists leave us because they find better salaries or improve their careers elsewhere," said a Salvadorian journalist, encapsulating similar sentiments expressed by others.

Key Findings

The section above outlines the range of challenges highlighted by study participants operating in pressure building contexts, and how these have multiplied as technology enables new forms of digital repression, surveillance and harassment and independent media outlets are denied ad revenues or subsidies directly or indirectly controlled by governments, whilst also losing potential digital ad revenue to digital platforms prioritizing clickbait. They also face a more complex web of legal threats at domestic level, have reporting suppressed by the weaponization of EU and US regulation and encounter the challenge of outcompeting cross-MDM as it moves at speed across platforms. They face direct attacks and efforts to turn public opinion against them.

The recalibration of technical and financial support to better meet these pressures and build resilience at the individual and outlet level is undoubtedly warranted. This may include improved access to legal support, improved preparedness which enables news outlets to design their news operations to better withstand threats, funding which facilitates investment in organizational development and specialist expertise which supports the growth of diverse revenue streams, and financial disbursements which minimize the impact of currency fluctuations. However, other levers must be pulled, including diplomatic action around the broadest range of threats to media freedom and improved engagement with technology platforms. Such approaches are explored in more detail below.

The Importance of International Advocacy, Diplomatic, and Legal Support

Journalists said that statements and attention from international watchdog organizations that monitor press freedom issues are helpful and can help spur diplomatic pressure and make them feel supported. While not surprising, it underscores the importance of supporting these groups as part of a local enabling environment, and reinforces recommendations about how to provide diplomatic support that have been made to the Media Freedom Coalition (MFC), the Community of Democracies, the Freedom Online Coalition (FOC) and individual governments over many years. However, participants said there is a need for such statements to address a wider range of media freedom threats, and for states to "practice what they preach" by improving their own policies and practices. The MFC, for example, tends to make statements only on journalist safety related to cases that are "life threatening" or already high profile. Advocacy and support for journalist facing spurious charges of defamation, terrorism or spreading fake news, for example, can help draw attention and put pressure on authorities. But charges of tax evasion, money laundering, hooliganism and other financial or administrative forms of

intimidation against organizations and individuals can be much harder to mobilize against.

"International pressure and international support can send a message to the government," explained a journalist in El Salvador pointing to Spain and Germany's response to a foreign agents bill, and help delay, if not deter, such restrictions. Maintaining diplomatic vigilance even after an initial uproar subsides or a draft is pulled is essential, say journalists. This is more likely if there are civil society organizations that are monitoring developments and can provide updates as well as mobilize attention from international press freedom groups or legal watchdogs. "I think they have a great role to play and can exert some pressure so that this government does not end up further limiting the work of the organizations and the media," said a media founder in El Salvador. And the other thing is that they don't abandon us, that this is the moment when we most need support."

Media need more than just advocacy; they also need legal support.

Few media organizations interviewed said that they have lawyers on staff and few journalists, much less freelance journalists, have access to adequate legal support. Lawsuits target media but can also threaten personal liability. Yet the legal aspect of safety is not typically part of the "physical, digital, psychosocial" safety trifecta.

Oftentimes legal support is needed over a long period of time and the type of legal support needed evolves as cases progress or new charges are brought. Press freedom groups recently joined forces to respond to this need by establishing the Legal Network for Journalists at Risk (LNJAR) to coordinate their and provide journalists and media with a single-entry point into an ecosystem of various types of legal support. This nascent network compliments existing legal assistance provided by bar associations and pro-bono lawyers around the world and various NGOs, whose assistance is often available on a limited, country-specific basis or provided through emergency assistance funds.

Study participants also said they need US and European governments to protect them from the weaponization of their own laws by malign actors. While not typically thought of as legal support, fixing the DMCA and other notice-and-takedown regimes that erroneously censor independent media could alleviate some of the pressure they feel.

Preparedness

Many independent public interest media outlets are in a state of adapting to and coping with "chronic pressure" and trying to do good quality journalism with minimal and often insufficient

resources. The idea of investing the time and money in basic preparedness is hard to imagine. Yet it is a critical component of supporting media that is often underestimated, underfunded, unacknowledged, or even ignored. Yet it can make the difference between journalists being safe or at risk. It can enable media to keep working, to communicate safely with their sources and teams, to pay the bills, stay connected, or relocate if needed. And it instills best practices for normal day-to-day operations and improves resiliency.

Preparedness frees up bandwidth to deal with a crisis should it emerge.

Most media organizations said that they do not feel well prepared for a disaster or a crisis, whether political, economic, health, or environmental.⁶⁷ In a 2021 survey, one of the few specifically ascertaining levels of preparedness, only 53% of senior media executives in Kenya said their news organization had a disaster plan, while another 13% didn't know whether such a plan existed.⁶⁸ This includes a lack of preparedness operationally, in terms of the ability to continue working if they or their staff must relocate or work without critical infrastructure, and capacity wise in terms of safety and security. Many of them said they would struggle to find legal support. Preparing for digital disruptions requires being able to keep the website and/or social media running; maintain secure communications, archives, and backups; and ensure account security. Preparedness allows journalists and news organizations to feel some agency over elements that they can control while fostering flexibility to respond to unanticipated challenges and navigate a crisis. Donors need to be aware and sensitive to this dynamic and trust their partners on the ground.

Given that elections intensify pressure, SIOs and online harassment and often provoke crack-downs or internet outages, they should be treated as potential crises. Rather than waiting until the election cycle comes up, for example, media should embed preparedness in everything we do: how to prepare for, report on and respond to a crisis, observed a Kenyan journalist.

Planning and preparedness must be addressed before a fast pivot to worsening situation or crisis, or it will be too late, too expensive, or too difficult to provide when a crisis hits. Safety and operational resiliency need to be proactively addressed in all situations and as soon as pressure begins building. A Ukrainian participant advised that organizations should support and prompt media to develop emergency preparedness and risk mitigation strategies. "It's not about training itself, it's about developing a plan with them, and about teaching them risk management," she said, "otherwise they simply will not do this."

Whereas media working in closed or highly repressive states will have some experience with

digital and operational security, this is less likely to be the case elsewhere. This means that mainstreaming safety, security, and preparedness into the work routines of media organizations and journalists in advance is essential and must be funded.

Risk assessments are an important but underutilized tool for preparedness, often reserved for individual journalists and a limited array of reporting assignments, or for media operating in highly restrictive places.⁶⁹ However, they need to be adopted and integrated into the core work of a media organization and done before an emergency breaks out. Risk assessments can also lead to a process of discovery that can be helpful for identifying where their data is stored and located and help media to think about preparedness and resiliency, according to an expert who oversees digital safety and technical support to Internews partners. Often, however, this happens too late or is underfunded. Part of adopting a "duty of care" mindset means that donors and implementing organizations fund and support such foundational work.

Trying to offshore operations or transfer terabytes of data out of a country needs to be done in advance of a crisis. It's hard to get partners or funders to think about this, according to several observations that were reinforced in interviews with media organizations who had given little thought to data security, archives, or risk assessments for their digital operations. Investigative media and media working in closed countries were the exception. "Our server is in the United States to make sure that we are not going to be censored or controlled or infiltrated in Tunisia," explained an investigative outlet, though they experience "difficulties with the exchange and the payment of services" because of foreign currency and exchange limitations. In this case, one of their donors paid for the technical infrastructure for the online news site directly and offered to purchase necessary equipment to avoid issues with cash transfers and currency limits. Study participants thought this could be helpful in other cases where moving money is difficult, volatile, or expensive. Journalists welcome the assistance provided by webhosting, cloud services, and digital security support based outside of their countries, while others said they needed this type of external support.

Putting in place a financial infrastructure outside of the country can be an important safeguard. It is too late when the crisis emerges to figure out how to register in a third country or set up bank accounts and payment systems. Media outlets need help navigating their options for registration abroad and the potential to open external accounts. Not only could such actions open them up to increased scrutiny or prosecution in their home countries, but they often need legal support to figure out the requirements and logistics for doing so, especially in inhospitable countries or when outlets want to stay under the radar. "At the moment we only have (bank) accounts in El Salvador, but our intention due to the political context is that

we also open an account abroad," said the founder of a media outlet that survives largely on donor funding, but "we need contacts and we need to see how all this is put together abroad."

Some media in Myanmar were better prepared for the most recent political crisis because they had been through it before, as were some media outlets in Crimea, which was invaded and occupied by Russia in 2014. "Make a backup now, prepare those documents, prepare emergency steps in case your correspondents will need to relocate or work in occupied territories," a journalist recalled an investigative outlet in Crimea advising other Ukrainian colleagues in their network in the weeks leading up to the 2022 Russian invasion.

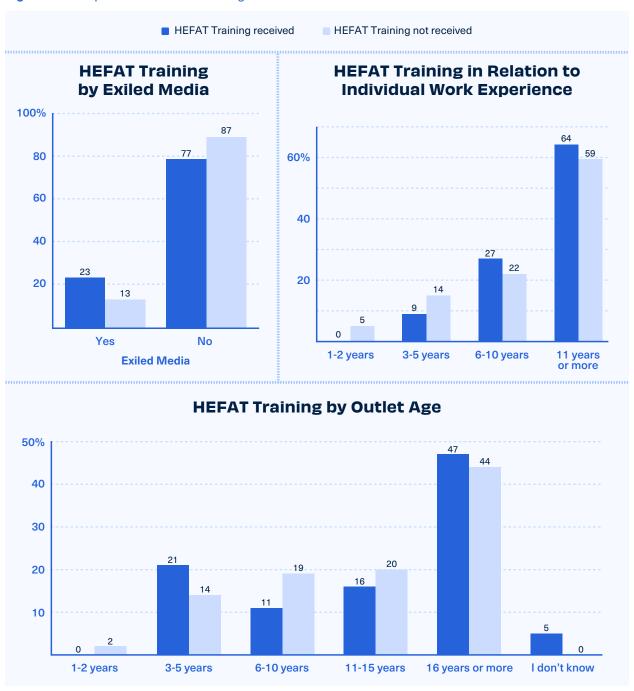
Safety, Training, and PPE

Safety is collective as well as individual, and media are finding that working together can improve their safety. Several journalists and media outlets described how they work collectively and collaboratively to investigate and publish jointly as a form of protection. "Cooperation increases your safety, it's not worth killing me because the story will still come out," said an editor who leads a transnational news organization. In Colombia, said another journalist, "a strategy we have is to travel in a procession, in a group, to places where we know that a journalist is exposed to a very clear risk of violence so that several media outlets go to cover the story as a group and collaboratively, without putting ourselves at risk."

Investigative journalism can be dangerous in countries where pressure is building because it often exposes corruption among those in power. "It's existential to collaborate," said the editor of Coda Stories, a global journalism outlet focused on global crises, "but it's incredibly difficult to do." Working collectively can provide a level of protection as well as access to secure ways of working and capacity building opportunities from the community that supports investigative journalism. Hardening and securing independent, and particularly investigative media, against myriad attacks radiating from rising authoritarianism, tech, economic fallout, and COVID requires dedicated support and money. "Just \$50-\$200K can have a huge impact on one of these niche outlets," estimated an investigative media leader. But media leaders were also careful to caution against donors forcing collaboration.

Newsrooms and journalists say they need more and better safety training, access to personal protective equipment (PPE), and want donors and partners to be responsive when they request security and safety training or support as pressure builds. Most journalists, particularly freelancers, don't have enough preparation or access to PPE to work in war zones, observed several participants, despite important progress made over the past several years.

Figure 9. Completion of HEFAT Training



Very few journalists said they have received hostile environment or first aid training (HEFAT), with fewer than 10% of survey respondents and just a handful of interviewees having received at least one course. In the first few weeks of the invasion of Ukraine, some international organizations provided remote such training, but "providing HEFAT training while bombs are falling is not ideal," observed a Ukrainian participant. In January 2022, a month before Russia invaded Ukraine, a local media development partner in Lviv requested from a donor to reallocate grant money to security training and was denied. After the war started, she was granted

her request, but by that time the war was in full scale and equipment was difficult to get and move across borders. Furthermore, journalists said they need to receive such training more than once if they are to remember and implement it.

Better Digital Security Capacity Building Needed, Not Just Training

Nearly every media professional in this study expressed a need for digital security training, citing the rise of spyware like Pegasus,⁷¹ cyberattacks,⁷² and weaponized influence operations. Protective measures for devices, accounts, and websites as well as secure communications were among the needs identified. The need is particularly acute in countries where pressure is building and spyware is used to target journalists,⁷³ as all the journalists interviewed from El Salvador and Mexico noted a need for improved digital security. However, there were little specifics on what they mean by or what to achieve with such training.

The most successful and positive experiences are where media organizations had an ongoing relationship with a partner or funder and could not only access training as needed but also receive hands-on or inoffice support.

Several journalists described having received a digital security training session, few had received sustained capacity building on digital safety, but did not see one-off or general tool-based training as particularly helpful. Except for the investigative journalists interviewed, who were all part of the Global Investigative Journalism Network (GIJN) and the Organized Crime and Corruption Reporting Project (OCCRP), most participants said they felt overwhelmed or intimidated by the complexity of digital platforms and security tools, many of which are also too heavy to be used effectively much less integrated into their workflows.

This research confirms what is well-known in the field and regularly expressed by journalists and media organizations themselves: training on basic tools and protection through singular training sessions rarely induce behavioral change or get embedded in an organization, leading to few sustained improvements in security practices. "If you just do trainings, tools, or tell them don't use this, use that, nothing will happen," said the head of a Colombian organization that provides digital security capacity building. When it revamped its approach to focus on a risk assessment and understanding the journalist's process and the tools they use, she said, journalists made sustainable improvements to the ways they work without trying to impose burdensome, time consuming, or complex protocols that are likely to be left by the wayside.

Vulnerability to Economic and Political Pressure is Compounded by Platformatization

As discussed, tech platforms provide critical infrastructure for independent media, but journalists described what they often felt were futile efforts to contend with the forcing function of platform policy, design, and algorithmic intermediation. Study participants identified content moderation (COMO) as a constant pain point because it undermines disinformation countermeasures like factchecking, imposes costs in terms of viability and trust, and is being manipulated and weaponized by malign actors (as noted in the discussion on influence operations) to target journalists and hijack news agendas.⁷⁵

Content Moderation (COMO) is experienced by news media through content or account removals, prioritization/de-prioritization, promotion/ demotion, shadow banning, and monetization /demonetization.

The dependency of media outlets and freelance journalists on Facebook, Twitter, and Google, means that when they lose access to or have their accounts or content blocked or removed it can have devastating impacts on their ability to do journalism, on their traffic and monetization, and on their relationship with their audience. "Over removal is now a normal thing," observed a participant. More than 15% of surveyed outlets reported having content removed or their accounts blocked as did several of those interviewed, including those with verified accounts.

Furthermore, US and European legal regulatory frameworks that require tech platforms to identify problematic content, remove it within a very short timeframe, and prevent it from spreading are an increasingly common feature of legislation aimed at combatting online harms ranging from terrorism to hate speech to piracy, and get incorporated into COMO sys-



tems. When and where the detection of content takes place, how and how quickly the assessment is done, the way enforcement takes place, and the access journalists have to contest these decisions or pursue remedy for inaccurate moderation, are all decisions that shape the viability of independent media.





The deep structural inequalities in the global information ecosystem are reproduced in these COMO practices. As "content cartels"⁷⁶ these platforms govern access to the digital public sphere and even coordinate to remove certain types of content.⁷⁷ For example, Meta cut off Facebook services briefly in Australia and threatened to do the same in Canada and the US in retaliation for news-related regulation, which disproportionately impacted small, indigenous and community news outlets as well as those in nearby island states.⁷⁸ The President of the Media Association of Solomon Islands underscored the importance of Australian news in her country and the harmful impact the ban would have on the ability of its citizens to discuss the news and hold their government accountable.⁷⁹

Content moderation systems end up censoring reporting on newsworthy issues, creating additional burdens on news outlets that are already under strain, have limited resources, and are often struggling to evade censorship and repression. These platforms reinforce structural power asymmetries, what some called digital colonialism, ⁸⁰ extending censorship on the very platforms that used to allow them to bypass it. ⁸¹ For example, coverage of US-designated terrorist groups, particularly in Arabic or other non-Latin languages, are regularly censored by algorithms that reinforce American foreign and national security policies in ways that end up impacting and censoring journalism and factchecking. ⁸² "If we write Allahu Akbar for example, a quote for example from someone who witnesses something, it means we will be censored," said the founder of a Tunisian outlet. Every journalist working in the Middle East pointed to

the over-moderation and censorship of Palestinian news outlets.83

Factcheckers in Tunisia and the Philippines said Facebook took down their content presumably because it triggered blacklisted keywords. Outlets covering climate issues face similar issues and are unable to buy ads or featured content because of platform measures to address climate change as a political or misinformation issue, observed an Internews director. 17% of outlets with a verified account had content removed or their account blocked, according to the survey. Some of this could be addressed relatively easily by the platforms, whereas improving Al moderation requires investment in research and development for relatively unlucrative markets and greater coordination with the media support community.

Several interviewees expressed frustration that they have no way to get in touch with anyone at the platforms when their accounts or content is blocked, an issue that steering members of the Global Forum for Media Development similarly identified as a perennial pain point for their members and news partners. Even those with a contact or who had worked with platforms on factchecking said that they remained unresponsive to COMO, verification, and sustainability issues. Several media leaders in multiple countries thought there must be a way to improve meaningful and responsive engagement with the major platforms.

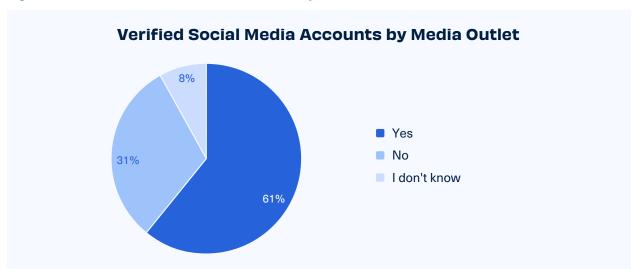


Figure 10. Verification of Social Media Accounts by Media Outlet

Recommendations

To Donor Organizations and Agencies: Funding and Programmatic Requirements

- Recognize that media globally is under unprecedented pressure and commit 1% of Overseas Development Assistance (ODA) to support to independent public interest media.
- Ensure that project-based funding includes adequate resources to support the salaries of both directly relevant staff and support staff. Fund business development and technical staff since the presence of these roles correlates with increased revenue and can also contribute to improved preparedness and adaptability.
- Define the objectives of media support and design reporting metrics accordingly. Ideally, media outlets are able to determine their own success criteria around how they provide value to their audiences and communities and able to gather performance data that is relevant to those criteria. This suggests flexible monitoring and evaluation approaches focused on learning and adaptation, and national-level coordination that enables individual outlets to make their contribution to strengthening the sector. In addition, agree longer term goals that sit outside program funding lifecycles.
- Consider new and innovative ways of channeling resources to local media that also build ownership and trust amongst their audiences. This might involve providing subsidies to local populations to purchase subscriptions or memberships and reorient attitudes towards paying for journalism.
- In countries where pressure is building, carry out joint risk assessment exercises with media development partners and other donors to develop a strategy for continuity and coordination should a crisis emerge.
- Use advertising, public diplomacy and public service messaging budgets to deliberately support independent and exiled media. Require transparency on the allocation



of government (at all levels)/IO funded advertising on both media and social media platforms and ensure an equitable distribution free of political biases. Include provisions in other types of assistance and aid to target government that requires public notices be posted in independent media outlets so that state advertising is not used to favor only some media.

To Governments and Media Freedom Coalition Member States

- Ensure domestic policies are aligned with policies being promoted abroad, such as ensuring copyright and privacy legislation, asylum and immigration policies, do not detract from media sustainability objectives.
- Speak out against laws which negatively impact on independent media and the free flow of information. Maintain diplomatic vigilance even after initial uproar subsides.
- Explicitly assess how local media abroad may be impacted by domestic policies, including those aimed at addressing content moderation, mitigating online harms, and enhancing individual privacy and intellectual property rights. Aim to ensure that these laws do not unintentionally censor independent news media and deter investigative reporting, take steps to mitigate these shortcomings if necessary.
- Enforce legal provisions that criminalize the filing of knowingly false claims under the DMCA and ensure that penalties are imposed on firms that engage in these types of information operations that target or plagiarize news media.
- Governments, official bodies, and public institutions must aim for transparency and open government, providing information and data to the public and through the media proactively, as well as through FOIA or Right to Information laws.
- Commit to regular engagement with the press, including through press conferences and interviews, and the development of professional public affairs staff in government agencies, and encourage diplomatic counterparts to do the same.



 Impose due diligence requirements as well as export licenses or a moratorium on spyware and surveillance technology.

To Implementers, with Donor Support

- Support and engage all actors within the wider information ecosystem in which news media are embedded in low-income countries and those where pressure is building, including professional associations, university journalism programs, organizations which monitor press freedom and legal regulatory developments, human rights, and digital rights organizations.
- Fund, support, and even mandate, country-level and organizational preparedness, and risk planning in contexts where pressure is building. Detailed guidance about organizational preparedness is offered in Annex 1.
- Embed tailored, context-specific digital security training with a psychosocial dimension as a core dimension of support. This should be designed around how journalists do their work, is ongoing and includes hands-on components for newsrooms to build digital security and resiliency into their networked infrastructure.
- Recognize financial viability and sustainability as a key dimension of resilience and provide partners in all contexts with the means to develop sustainable business models where those may exist through the provision of technical support and access to the Media Viability Accelerator. Appendix II provides further guidance.
- Consider increasing the flexibility with which media organizations can use funds, provide unrestricted core funding, and consider funding trusted outlets in advance so they can build cash reserves. Consider providing payment disbursements based on a timeline co-created with the partner that takes into account the possibility of major currency fluctuations.
- Consider providing equipment or training directly as opposed to funding its requisition in places with highly volatile currencies.



- Improve access to legal support, including the creation of a single entry point to a network of legal support improved connections between media and legal and insurance against legal attacks.
- Address news deserts by supporting local media outlets outside of capital cities or major urban centers who serve under-represented audiences in less populous languages.
- Consider supporting journalism initiatives which overcome local pressures on freedom of expression. These might include transnational journalism or journalism distributed on encrypted platforms such as WhatsApp and Telegram or podcasting.
- Identify alternative impact metrics than those which rely on traffic and engagement data, particularly for outlets that serve small or niche communities or which are operating in, or serving audiences in, countries with limited press freedom where VPN usage is likely.
- Offer technical assistance to media organizations to apply to factchecking networks and other news integrity-focused initiatives, and develop the capacity to meet requirements, such as publishing mastheads, codes of ethics and correction policies, and the like.
- Contribute data and resources to a state-of-the-art sectoral research agenda which drives evidence-based policymaking and programming while improving learning in the sector.
- Support partners to understand the potential for generative AI within their work, and to promoting critical reflection, transparency, and further research around its use amongst the wider sector, including its implications for SIOs and MDM.

Fast Pivot to Worsening/Crisis

This section focuses on the needs of journalists and media in countries that experienced a fast pivot to worsening, often triggered by a catalyst event such as a coup or violent conflict and its immediate aftermath. These types of crises often force domestic media to flee, close down, move online only, and/or operate from exile temporarily or permanently. The transnational challenges created by these crises underscore the need for diplomatic leadership and media development strategies to support these transnational media as well as support and solidarity networks.

When pressure is building it can quickly pivot into a rapid deterioration or crisis that leaves no time for preparation or adaptation. Crisis or disaster triggers operational continuity challenges, a complete breakdown in the enabling environment, and severe safety threats caused by security crackdowns, legal restrictions, or emergency law, drastically weakened economic conditions, and infrastructural failure, including limited access to electricity, the internet, and mobile phone networks. Broadcast outlets may find it impossible to operate since they need studios, equipment, and transmission facilities. For example, when, Russian internet providers shut down the website and app of a Russian TV station. "We couldn't just go underground or move abroad," explained a news presenter.⁸⁴ "There was no other option but to close down." Journalists and media workers may decide they must leave the country, triggering a complex transnational challenge that is compounded when large numbers seek to relocate at the same time. Media outlets and journalists must understand their risk and quickly adapt to stressful and challenging new operating procedures, reporting and publication practices, and a rapid deterioration of the enabling environment for independent journalism.

A crisis causes considerable personal toll and trauma, uprooting people and their families, with far broader implications than the professional and sustainability issues outlined in this section. This is important for the media development community and donors to keep in mind throughout their response. Ukrainian journalists described the psychosocial trauma caused by war and relocation, as did journalists working in exile. In the immediate aftermath of the Taliban takeover, most women journalists stopped openly working for media outlets, according to reports and interviews, though some continued under pseudonyms or by adhering to the restrictions imposed by the Taliban. Many of Afghanistan's journalists, especially women, left when the Taliban took over Kabul, scattering across the world.85 Those with some level of

preparedness may be better able to stay safe and cope physically, mentally, and logistically while ideally continuing to operate. "When a coup happens your body and your mind cannot hold this information," said a journalist from Myanmar.

Military action and violent conflict can make it virtually impossible for media to move or operate in the initial days of a crisis because of deteriorating safety and the breakdown in basic infrastructure as well as the rise in repression and/or nationalism that accompanies these situations. Borders may become impassable. Safety is an urgent priority as the situation changes rapidly and there are likely to



Adviser to the Ukrainian Interior Minister speaks to journalists during a briefing in Borodyanka. Credit: Anatolii Siryk/Ukrinform

be acute physical and digital security needs as well as systemic organizational and logistical safety issues. Playing catch up in terms of preparation is virtually impossible, and more must be done to support and reinforce preparedness as a core value and funded aspect of media sustainability support, as outlined earlier in this report. "The safety piece is really important there and probably more importantly than any other context," explained the head of Internews' freedom of expression programs, "because people going from a potentially standard or traditional operating model to having to rapidly change to something else which might require different procedures, different digital security, different workflow, different operating environment."

When the Taliban took over, in Afghanistan, for example, media organizations found that they had to scramble to try to get their staff (especially female) to safety in the middle of a geopolitical catastrophe; navigate a perilously complicated evacuation process; backup and offshore their data and archives (even as they considered whether to delete their public presence online entirely); or figure out how and whether to continue operating. In Ukraine they were somewhat better prepared because several organizations started preparing for a Russian invasion as pressure was building, according to interviews. Media assistance groups and networks tried to prepare their members and partners for the possibility of war, including identifying digital security gaps, making backups of their websites and archives, and taking emergency steps in case correspondents had to relocate or work from occupied territories. Individual journalists may not know or be able to remember in a crisis all the paperwork and things they need, so thinking this through in advance and having quick and easy access to resources like checklists and how-tos is helpful.²⁶ "It was really important to doing their work up to when the full-scale invasion started," said a Ukrainian interviewee.

Emergency law, military censorship and suppression are likely in armed conflict or fol- lowing a coup. Countries that are targeted by external violence experience a "rally around the flag" form of patriotism that can make it difficult to report freely or obtain official information. In Ukraine, for example, journalists said that officials sought to increase control over broadcasting to shape the narrative and would not speak to some media outlets, leading a journalist to say that they felt their government "got a free pass" when the war broke out.

Furthermore, the media become a central actor in the crisis when questions about loyalty and propaganda arise and framing and agenda-setting contests take on geopolitical implications. SIOs are a virtual certainty as is aggressive content moderation by platforms when they come under pressure for not doing enough to stave off propaganda and disinformation,⁸⁷ creating additional challenges for media to navigate. Crisis heightens attention and interest in news from that location and local media play an important role in informing their communities, shaping global coverage, and filling information voids.

Crisis or disaster can trigger:

- Operational continuity challenges, a complete breakdown in the enabling environment, and severe safety threats
- Security crackdowns, new laws and regulations or changes to the legal system more broadly, drastically weakened economic conditions, and infrastructural failure, including limited access to electricity, the internet, and mobile phone networks

Network Shutdowns, Surveillance and Financial Infrastructure Disruption

Fast pivots to worsening situations and crisis may trigger a breakdown in basic infrastructure, from electricity and mobile and internet networks to the financial and banking systems.

- Limited access to reliable electricity and a need for generators
- Network shutdowns or throttling imposed as a form of censorship
- Platform availability since many outlets will need to rely on social media or messaging apps to reach their audience
- ATMs may not work and online or mobile banking may not be an option due to availability or the risk of surveillance and tracking, meaning that access to cash becomes a serious challenge for operational continuity

Intentional internet shutdowns, access, or bandwidth restrictions (throttling), heightened repression, or the destruction of infrastructure can make it impossible to backup archives, obtain remote training or support, much less conduct reporting or disseminate the news. "How do you restore data? Backups? You've got to be really creative and smart in the way you do it because you can lose all you did," observed an investigative Russian journalist who left Ukraine because of the war. It is likely too late to try to backup archives, learn how to securely communicate with sources and staff, and get physical or digital security training (not to mention psychosocial training). Preparedness with respect to the digital infrastructure of each organization and each journalist is therefore essential.

Financial Limitations, Currency Volatility, and the Upending of Business Models

Business models are thrown into disarray and revenue streams quickly dry up when advertising becomes unavailable or financial infrastructures break down. Financial limitations on the movement of money imposed by domestic authorities and/or externally imposed constraints, such as sanctions limit access to global credit and payment systems. Currency exchangeability and volatility, banks closures, and the challenge of moving money can make it difficult to pay salaries and operational expenses and restrictions on moving money in or out of the country may be imposed. Media support organizations were physically unable to send money into Afghanistan via wire transfer due to sanctions and a run on banks in the country that caused a shortage of cash as everyone attempted to retrieve their life savings. While some were able to use informal Hawala networks, they had limited utility as they don't scale, seepage is common, and donors resist letting their grantees use them, according to interviews.

Fast pivots may eradicate the commercial basis for media as the advertising sector is upended and audience needs and identities shift, meaning media will need urgent core support to fill sudden gaps in revenue. Business plans can become obsolete as the ad market evaporates and media are unable to monetize online or receive money from donors or supporters pay expenses, as underscored by journalists from Afghanistan, El Salvador, Myanmar, Ukraine and Venezuela.

Media outlets may drop their paywalls during crisis to provide their reporting and content freely at a time when attention is high. This improves access to information and helps mitigate information voids and MDM, but means the outlet will need to find replacement income. Ukraine's largest independent media outlet *Ukrainska Pravda* (UP), for example, saw its advertising revenue drop 90% after the invasion amid the collapse of the domestic advertising market, according to a media manager.³⁸ Its advertising plummeted even as traffic to its website

skyrocketed 900%, leading the previously commercially viable media outlet scrambling for new types of funding and approaching media development donors for the first time. Media in countries with previously viable commercial media sectors will need help understanding how to access support from the media development community.

Media managers say they needed longer timelines or lighter grant processes to allow them to make the pivot, weather the crisis, and keep their news operations running. "Donor organizations themselves have to adapt to the new reality. For the last months, support has been piecemeal. Creating a budget for every month has been hard for everyone," said the director of a Ukrainian outlet. Study participants from countries in or recovering from crisis described the constant search for funding and reporting to donors as exhausting and time consuming, detracting from their focus on keeping operations up and running while navigating violent conflict and displacement. "Media outlets and especially, the leaders of the teams, are exhausted by the constant need to search for funding and reporting processes," said one participant. "The editor in chief isn't able to write grant applications and to search for funding and to write reports each six months," she said, adding that even in their "normal state" media organizations lack sufficient administrative staff and operational support. These sentiments were echoed by many journalists in worsening, crisis, and exile situation, with media from Myanmar especially vocal on this point.

Providing longer timelines for core support would contribute to sustainability in smaller outlets that lack the staff and capacity to regularly report to donors and do their work. A Ukrainian participant noted that local and hyperlocal media have very small teams of between two and 10 people, meaning that "one person on a team does everything from producing the content, to posting it on social media, to preparing grant applications, and so on.

Amid a fast pivot to worsening situation there is often a need for equipment, staff safety, and basic operational expenses when media outlets shut down or relocate. A participant from the International Institute for Regional Media and Information, for example, said that 22% of Ukrainian media outlets lost access to their offices, with significant reductions in the number of staff (46%) and salary cuts that saw a quarter of journalists working without salaries. In Afghanistan, Syria, Ukraine, and other crisis-ridden markets, core or unrestricted funding helped media and their staff adapt quickly to the loss of revenue sources and address urgent needs, including paying their journalists.

Platformatization and Additional Challenges of SIOs and COMO in Crisis

Platformatization and content moderation issues become particularly acute for media in fast pivot to worsening and crisis situations, where time and visibility are essential, content moderation and advertiser squeamishness intensify, and information operations pose an existential threat. The circulation of propaganda and false information spikes during a crisis. One collective that had debunked more than 900 items a few weeks into the Ukraine war said it had seen an exponential increase in virality. Protecting legitimate, credible news outlets from getting blocked and allowing them to continue to monetize digital advertising is an important part of combatting SIOs and MDM.

Despite years of awareness raising and advocating with platforms to better protect local independent news media, especially the wake of YouTube's massive takedown of Syrian reporting on ISIS due to algorithmic filtering, 1 COMO problems during crisis are unremitting. Coverage of US-designated terrorist groups, particularly in non-Latinate languages, are algorithmically overly moderated yet under resourced when it comes to Al and machine learning. Several journalists said that covering violent conflict, politics, and corruption is challenging on social media platforms because their rules restricting graphic images, disinformation, and terrorism and protecting privacy and copyright either do not include exceptions for newsworthiness or fail adequately provide those in practice. 12

After the coup in Myanmar, some outlets reported that they were unable to monetize their stories and videos on Facebook and YouTube a year later, while Afghan journalists said that common terms to refer to the Taliban triggered account restrictions. Myanmar media outlets said they saw their pages slowed, sharing restricted, and other measures that reduced traffic and reach because of new geographic restrictions imposed by the platforms and because of potential violation of policies against graphic content, which is hard to avoid when covering such crises. One which had generated between \$3000-\$8000 a month on YouTube, saw a two-fold increase in subscribers after the 2021 military coup but was severely limited in its ability to monetize their channel a year later, according to a manager.

When Ukraine became a global story it generated unprecedented global traffic for local media, yet content moderation systems erroneously restricted their content and account shutdowns were major issues. For example, the Facebook page of Ukrainian channel Kanal 5 was deleted and lost more than half a million followers after reporting on abuses by the Russian army. When it was reopened, they were warned their accounts could be restricted and they regularly experienced restrictions resulting from their coverage. If journalism is to be part of

the response to SIOs and MDM during crises, the platforms must find a way to ensure their responses don't inadvertently end up censoring them while ensuring that factchecking and debunking can scale across platforms and languages.

Independent media must be prepared for foreign and domestic state-aligned information operations during a crisis like a coup or violent militarized conflict, and elections. Information warfare was a central element of Russia's offensive, which is why it launched a deadly rocket attack on a Kyiv television tower and cyberattacks against media websites in Ukraine in the first weeks of the invasion. Meta, Google, Twitter, TikTok and other tech platforms founds themselves pulled into a geopolitical crisis as they deplatformed, de-monetized and de-amplified Russian state media and official channels, as they had just a few months earlier when the Taliban retook Afghanistan. Platforms need to improve their crisis protocols and improve their content moderation systems to protect and amplify the accounts of independent public interest media.

A major challenge online news media face when it comes to sustainability is the intersection of digital advertising and content moderation. Advertisers can be particularly squeamish when there is a crisis or fast pivot to worsening situation as they do not want their products to appear next to images of war, famine, terrorism, or a host of other undesirable yet newsworthy content. As a result, news sites have found they are often unable to monetize reporting on critical public interest news. The use of blunt technology like keyword lists and exclusion lists has had devastating effects on revenues for some small news outlets and on their ability to cover some types of news, from politics to climate to health, said study participants.

Yet 2021 industry research report found that brand safety concerns about news content were unfounded and that in fact the reliability of the news source matters more, news is valued, and brand presence in reliable news drives ad effectiveness.⁹⁹

Collaborative efforts by the media development community and publishers to enlist the private sector to proactively support local news are paying off. The homegrown InfoPoint Agency, a collaborative advertising agency whose mission is to support "pro-democracy media" in Eastern Europe, connects responsible international brands and high-quality exiled Belarussian, Ukrainian, and regional media. ¹⁰⁰ Brands4News launched specifically to incentivize brands to support Ukrainian news media and protect independent news outlets from being hurt by advertiser squeamishness. ¹⁰¹ Ads for News, deemed a "World-Changing Idea" by Fast Company, has leveraged this symbiotic relationship for more than 10,000 local news organizations in 53 countries. ¹⁰² Rooted in market-based solutions, these multistakeholder

initiatives are curating lists of verified, trusted, credible, or otherwise certified local media and creating a common infrastructure that links information integrity and media sustainability.

Leaving and Emergency Assistance

Spikes in journalists seeking exile correspond with political crises and conflict in which journalists are targeted, in addition to the steady flow of individual journalists seeking safe refuge because of the threat of imprisonment or violence. The back-to-back crises in Afghanistan (August/September 2021) and Ukraine (February/March 2022), coming on the heels of the February 2021 coup in Myanmar and the ongoing media crisis in Syria, led to a mass exodus of thousands of local journalists, media workers, and their families and decimated local media ecosystems. It also put unprecedented strain on the media support community, which is not set up to deal with humanitarian evacuations, large-scale refugee and visa requirements, and complicated travel and logistics on this scale and scope. The crises put tremendous pressure on their staff and other programming.

Fast pivots and crisis may also affect media in neighboring countries, particularly those operating near the border, as well as exiled journalists. They may also need emergency assistance and relocation support, generating a multifaceted, transnational coordination challenge. The country in crisis garners the lion's share of attention from donors and the public.

The 2022 crisis in Ukraine is illustrative. The impacts of the Russian invasion reverberated in media outlets throughout Eastern Europe and even in Central Asia, where authorities restricted or retaliated against independent reporting on the war. Media organizations in Moldova near the border were worried and wanted safety support and relocation support, for example. Exiled Belarussian media who had resettled in Ukraine suddenly found it was no longer safe and also had to be relocated. "It was a double exile and there were all of these other journalists that also needed assistance, but they had so little international or diplomatic attention," as one journalist explained. Neither the diplomatic community nor the public willing to crowdsource local journalism were focused on those media, said study participants, yet those journalists also needed to be evacuated, resettled, and supported.

Key Findings

The above section sets out the challenges common to a fast pivot to worsening situation, including a tightening of laws, a deterioration of security and increased targeting of media, economic collapse and a breakdown in basic infrastructure that impacts daily operations. A key finding related to fast-pivot to worsening situations is that preparedness can reduce the

negative consequences for independent media once crisis hits, but that preparedness strategies are not in place to the extent that they need to be given the likelihood that such crisis will increase in number.

Donors have a responsibility to help media outlets think about safety, digital security, and preparedness even if the outlet itself is not. Because when a crisis occurs, the people they support will be dealing with it on a personal level as well as a professional one. Whereas digital and operational security are "baked into" media support in closed media environments, this is not the case elsewhere. If they haven't been addressed when the situation in a country quickly deteriorates, it may be too late. "In already closed environment people are already experienced with this," said an Internews director, but in a fast pivot to worsening situation there is often a lot of awareness raising needed as well as direct delivery and adaption, which limits its reach and effectiveness.

In addition to supporting individual journalists and outlets to prepare, the international community can take preemptive action, including positioning to transfer cash into the country quickly and relax standard compliance processes, bolstering basic infrastructure through the provision of satellite internet, assembling vital information about visas or access to PPE in a single place, developing scenarios for evacuation or departure, readying outlets to transition their operations, business models and editorial perspectives — not least by learning from those who have already relocated — and engaging with technology platforms to ensure that high quality media is elevated and not suppressed as the crisis unfolds.

Borders, PPE, and the Need for Diplomatic Support

Borders may be closed or become impassable in a crisis, creating travel and logistical barriers, and making it impossible to obtain assistance, training, or PPE. Journalists need assistance obtaining visas, navigating immigration/asylum processes, and the logistics of relocation, all of which are highly labor intensive and specialized, making it difficult for emergency support groups to resource properly in a large-scale crisis given limited staff capacity and the necessity of diplomatic coordination and support. Journalists who are forced to leave must provide detailed information and documentation to national security and immigration authorities, which can be prohibitively difficult, or even impossible. And they may have to transit third countries and face difficulties obtaining necessary visas even when there are host countries waiting to accept them. Having key documents in order in advance of a crisis can help speed up the process of relocating.

Similarly, searching for PPE during a crisis is challenging and time consuming. Moving

military-grade PPE like flak jackets over borders as a pivot is happening can be virtually impossible (though it is already difficult in any situation). A month after Russia invaded, for example, security issues remained a priority for Ukrainian journalists who needed bulletproof vests, helmets, first aid kits and other essential PPE, said study participants. But moving these types of PPE across international border poses legal and logistical challenges. Media professionals and support groups need a centralized repository for information about how and where to source PPE for the press, and access to regional stockpiles, suggested some participants.

Generators and Satellite Internet are a Lifeline

Generators were essential in Ukraine, Syria, and Lebanon in the immediate aftermath of crises that knocked out critical infrastructure, according to participants. Internet access points may also be needed at the outset of a crisis, and satellite internet is useful for continuing operations but less so for archiving and backing up significant amounts of data, though it can also offer an (expensive) way to avoid government surveillance. For example, two days after Russia invaded, Starlink satellite internet service was activated in Ukraine, and USAID paid for 1,300 terminals and helped get 5,000 terminals into the country.¹⁰⁴ Starlink was already in the works as an internet solution for rural Ukraine when the war broke out and Russian attacks knocked internet service out in several major urban areas. Media outlets serving Myanmar said they wanted the same type of support. "Internet is very important, and we need to not rely or use the infrastructure of the Myanmar military regime," said a journalist from an ethnic minority community, alluding also to the security risks posed by using telecommunications infrastructure owned and operated by a hostile government. This means journalists would need satellite equipment and connections, he said, in addition to the cost of installation for Starlink receivers on the ground and the monthly subscription fee.

Satellite-delivery of internet is helpful, though expensive, and currently reliant upon commercial providers, meaning it would also be of limited utility in countries subject to sanctions.

It seems less likely that Starlink would provide a solution in cases where the crisis is fully domestic and driven by internal repression since much of the infrastructure will be owned and operated by the government. Broader development assistance and access initiatives could lay the groundwork for internet access in conflict situations if they took a coordinated approach that prioritizes countries where pressure is building, particularly with respect to foreign intervention.

Crowdfunding

Crowdfunding has the potential to raise significant funds, help fill critical gaps in funding, and maybe even turn some supporters into subscribers. When a crisis becomes international

news, new global audiences may want to read local coverage or support local outlets, making crowdfunding a potential avenue for raising funds. This is more likely to be effective for media that publish/broadcast in English and other major languages of audiences that are more likely to have disposable income to donate. Crowdfunding has been a lifeline to some media during times of crises to make ends meet, and ideally a media outlet can translate support from one-off donations to sustaining subscribers.

One of the most successful was a consortium of European media outlets led by *The Fix* that launched a multiplatform crowdfunding campaign to collectively raise money for more than a dozen Ukrainian outlets to provide emergency support to help newsrooms relocate and cover the increased operational costs of covering the conflict as safely as possible. "Our main goal is to help save lives, first and foremost, and then safeguard Ukraine's independent and ethical media," wrote *The Fix* advisory board in an open letter on its website.¹¹06 Using a combination of major Western crowdfunding platforms and direct donations including via cryptocurrency,¹¹07 it raised more than €3.2 million by the end of August for 13 leading national media and helped some of them launch their own crowdfunding and membership efforts.¹¹08 *The Fix* GoFundMe campaign raised more than a million dollars from more than 16,000 donors around the world, and continued to garner support through the end of the year.¹¹09

The Fix also worked with the Kyiv Independent, a new outlet registered by the founders of The Fix, to raise nearly €1.7 million in a stand-alone GoFundMe campaign from more than 28,000 people and similarly continues to attract supporters. It got a lot of one-time donations because people were interested in the topic of Ukraine, said one of its journalists, but it also was a way to convert supporters into patrons through monthly recurring subscriptions on Patreon. In the days before the Russian invasion, it had 700 subscribers.¹¹¹⁰ At the time of writing the outlet was generating more than \$85,000 a month from more than 9,800 individuals willing to pay between \$5 and \$30 a month.¹¹¹¹ These campaigns generated coverage by leading global media outlets in the US and Western Europe and many of them donated money, time, equipment, and publicity to the efforts.¹¹²

Crowdfunding is also used by the media support community to raise money to help NGOs provide services to media in crisis, including PPE, security training, and other types of assistance. Several media support groups launched crowdfunding campaigns in conjunction with the crises in Afghanistan and Ukraine, which can provide helpful supplemental funding while providing the public with a way to show their support.

But crowdfunding not a panacea and comes with significant risk. External campaigns may make promises about how the money will be spent that are unrealistic or restrictive, funds may not be immediately available, and well-meaning efforts may complicate emergency coordination, as was the case in Afghanistan.¹¹³ It is risky and likely to have limited efficacy as a sustainability solution and is largely unavailable to media outlets in low-income countries or those with limited financial gateways, especially without an intermediary.

News Agenda & Audience Shifts

The news agenda and audiences shift during a pivot or crisis and may mean adapting and reconfiguring editorial and operational plans. "The range of topics that I work on the changed drastically since the invasion," said a Ukrainian journalist working from Europe. In some cases, journalists and media outlets said they could no longer reach their local audiences, and if they leave their country as part of a bigger exodus, they may shift their attention and objectives to serve the migrant community or diaspora, who might be willing and able to pay for news. A Venezuelan journalist in exile in Colombia described launching a media outlet to serve the migrant community at the border, for example, because of their distinct information needs and susceptibility to MDM, especially on social media and messaging apps. Also, being able to geo-target audiences based on language is an advantage.¹¹⁴

Some media that weathered a fast pivot to worsening situation said they shifted to target Western audiences and started publishing (more) in English. In interviews with Myanmar media, participants described pivoting to "the international community" and publishing in English because there was a heightened interest after the coup, and it became increasingly important for media from Myanmar to inform the geopolitical situation. "Burmese and other media languages are not reaching the international community, and particularly governments, or particularly the US international organizations," observed an exiled journalist. An outlet covering women in Afghanistan used funds raised to help her expand coverage of Afghanistan

to include English because the supporters she attracted through crowdfunding were largely English-speaking. 115 Using English or another major language helps improve search engine optimization and discoverability, which can be important for evading local language COMO restrictions and to improve various types of revenue generation. It also improves search engine optimization and discoverability.



Recommendations

To Donor Organizations and Agencies: Funding and Programmatic Requirements

- Invest in preparedness and support flexibility around funding when pressure is building.
- Relieve the burden of reporting requirements and recognize the limitations posed by the challenges of transferring money e.g. providing hard copies of documentation, communicating securely with reporters still in the field.
- Provide core financial support to partners where revenue streams don't exist, erode, or need time to reconfigure.
- Plan on a crisis affecting not only the media in the target country, but also media and journalists in exile in the country and possibly neighboring countries. Provide support to those journalists and newsrooms as well.

To Governments and Media Freedom Coalition Member States

- Establish agreements to allow the transport of PPE across borders.
- Prepare to provide high level coordination and support in anticipation that journalists, including those from neighboring countries, may need to relocate or evacuate, and transit multiple countries.
- Call attention to the situation for media in neighboring countries, who may be experiencing ripple effects and will also need support.
- Recognize media workers as a vital, at risk group in need of explicit protection.



To Implementers, with Donor Support

- Work with tech platforms to establish an emergency mechanism to protect and elevate independent media during a crisis, and, more broadly, improve conditions for independent public interest journalism globally. Such work may include curating legitimate, quality journalistic accounts and working with social media platforms so that they are protected against weaponized or overzealous content moderation and to brands so that they can direct advertising towards reputable, 'brand-safe' news sites. Examples include Brands4News and Ads for News.
- Continue to develop and scale out forecasting initiatives such as <u>Machine Learning</u> for Peace, an early warning system that helps identify when building pressure is likely to pivot into worsening repression or an acute crisis, <u>Social Media 4 Peace</u>, and the Online Harassment Early Warning System.
- Adapt operational systems to support swift cash transfers and increased flexibility in how partners can use funds, and to advocate for an increase in unrestricted core funding.
- Provide equipment to overcome shutdowns, including generators, satellite phones and internet, SIM cards, and data subscription costs.
- Create or provide a central database of emergency visa, journalist support mechanisms, and PPE by country so that when a crisis emerges there is a central repository for the community to use.

Exiled Journalists, Media, and Their Migratory Hosts

An unprecedented number of journalists have been forced to relocate, seeking refuge temporarily or permanently in a third county as media organizations grapple with the challenge of figuring out whether they can continue operating. While there are no reliable statistics on precisely how many journalists have been forced to leave their homes or where they end up resettling, media support groups described the 2021 Afghanistan crisis as unprecedented, eclipsing the *previously* unprecedented effort to evacuate a group of 70 journalists and their families under imminent threat from Syria that started in July 2018 but took several months to get just two dozen journalists out.¹¹⁶ "Afghanistan was Syria on steroids," as a participant from a media support group put it, and was followed by the Russian invasion of Ukraine just six months later.

This report uses the term exile to refer to journalists or media outlets who seek refuge by relocating their work or operations temporarily or permanently, and focuses on immediate, acute needs, which are similar irrespective of one's intent to return to their country or not.

When individual journalists needs to be urgently evacuated because of threats or fear stemming from their work, temporary and short-term refuge is often enough and can be organized through an array of emergency assistance funds coordinated through the Journalists in Distress network. ¹¹⁷ However, when large groups of journalists and their families need to be urgently evacuated or relocated during a crisis and entire swaths of the media reconstituted in a third country, there are significant acute and longer-term logistical and coordination challenges. These cases require sustained and strategic support but also robust diplomatic support as well as a visa and immigration system that is better prepared for these increasingly frequent situations.

Journalists need immediate assistance on a personal level while media organizations need support to transition to remote operations or relocate to a third country.

Journalists forced into exile are likely to be exhausted and traumatized and need all types of support including psychosocial and relocation assistance for them and their families. Women



journalists, especially, are unlikely to leave without their children and all remain concerned about the impact of exile on family members left behind. In addition to a thicket of administrative, legal, and logistical needs, journalists need help to continue working in journalism. Although there are no statistics available about how many journalists are able to keep working in journalism following a crisis, much less for how long, a decade-old report by CPJ found that over a five-year period, 25% of the journalists it helped through its Journalist Assistance program remained in journalism.¹¹⁸

To stay in journalism, they need to figure out how to operate and report remotely, reach, or redefine their audiences and language/s of publication, and what viability looks like before pursuing a new business strategy. As noted, the language of publication, use of VPNs, and content moderation all affect these business choices. Study participants said they need support to figure all of this out, but also warned that there simply may not be a sustainable business model in exile. "Efforts to transform journalists into entrepreneurial, market-oriented managers have had limited success" given that they tend to be purpose-driven and "have a palpable lack of interest in business management." 119

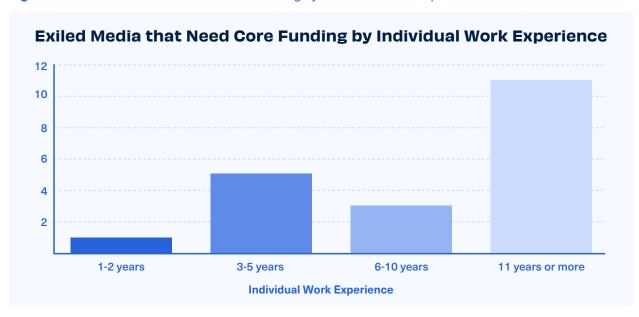


Figure 11. Exiled Media that Need Core Funding by Individual Work Experience

Interviews with exiled media for this report echo those of a foundational report by exiled Zamaneh Media based on an expert convening of exile investigative media from around the world. 120 It covers the unique challenges of managing exiled, decentralized new operations in different regime contexts, including specific guidance about circumvention tools, strategies for accessing blocked audiences and maintaining safe operations, and should be a key reference

document. It examines sources of financial support and business models and recommends core, long-term funding that all exiled journalists interviewed and 95% of those surveyed for this study said was their number one need. A participant observed that "[e]xiled media organizations with professional standards, and multiple donors tend to survive," as is the case with several of Myanmar's exiled outlets, some of which have been operational for more than 20 years and navigated multiple relocations.

Media and journalists alike need the ability to register as a legal entity in the country they end up in. This impacts their ability to establish legal residency, open a bank account, receive donations or grants, and obtain accreditation, particularly in countries where the government is involved in the process. If they want to continue working in migratory host countries, they need journalism work visas so they can function as journalists, not just as migrant workers, and forced to keep a low profile, said a Burmese journalist, echoing similar comments from exiled Ethiopian journalists. Navigating these logistics is challenging for media forced into exile, who say they often lack the requisite linguistic and legal expertise and just trying to stay safe and survive, dealing with psychosocial trauma, and trying to continue covering the place they left.

Many European countries allowed displaced Ukrainian journalists to cross their borders relatively easily, relocate and continue working. "I was granted temporary protection status, as were the majority of Ukrainians who'd like to work," said a Ukrainian journalist who was residing in Portugal after leaving Poland. Portugal provides access to medical services and a social



security number that permits local employment and remote work. Similarly, in Colombia the temporary protection permit is granted for 10 years and allows the holder to open a bank account and register with tax authorities, according to a Venezuelan journalist in exile there. But this is not the norm. Afghan journalists who resettled in the US said they were unable to work or even receive honoraria for speaking events.

In some cases, the only or best relocation option is to migratory host countries with relatively inhospitable press freedom conditions for domestic media. Exiled journalists working in Mexico, Thailand, and Turkey, for example, describe keeping a low profile or carefully

navigating legal registration issues to avoid drawing attention to their presence. Countries that receive a large influx of refugees or migrants, or which serve as a major transit point, may be less hospitable and housing can be expensive and difficult to find. Journalists may find that they are not welcome in their country of relocation, which limits their ability to register or operate legally and has forced some to work in ambiguous grey zones, putting them further at risk. But countries that allow entry without a visa or provide easy residency permits are attractive options, explained a freelance journalist living in exile in Turkey.

Relocation is easier to do when people can remain relatively close to their home country. But amid rising transnational repression, individual risk assessments are critical since journalists can become highly vulnerable targets even if they leave the county.¹²¹ Several journalists in Africa, Asia and the Middle East who relocated to nearby countries in the face of domestic threats have been murdered, arrested, and forcibly repatriated, to prison.¹²²

Importance of Solidarity and Networking

Across the board journalists working in exile who were interviewed and responded to the survey want opportunities to connect with media in the areas where they reside, and many would like opportunities to meet other media professionals like themselves to exchange experiences and feel less isolated. They said they need opportunities for network building with the local media community and among other exiled journalists as well as training to hone their skillsets and improve their capacity to continue in their profession. These needs could easily be addressed in the short-term through existing programming in migratory host programs and invitations to conferences or training workshops, for example.

Belarusian media working in exile established a network to build solidarity and provide common infrastructural and organizational support to independent media. This type of collective approach aimed at building solidarity should be supported in a wider range of contexts where there are local actors driving it.



Press freedom advocates protest in front of ABS CBN headquarters in the Philippines.

In Istanbul, local exiled journalists established a volunteer collaborative for media practitioners employed by foreign media in Turkey (including freelancers), and open to Turkish journalists working for foreign media. It helps newly arriving journalists who need assistance with residency and press credential applications and connects them with legal assistance. When Russian journalists exiled arrived in Istanbul, the network helped them navigate how to get emergency and visa assistance, and even hosted them in their homes when the international organizations it sought to connect them with had different priorities, like helping Ukrainian journalists, or were too slow. It has provided members with digital security training, the training need participants interviewed for this study said was most needed and wants to offer sessions on a regular basis if it had funding and administrative support to do so. To supplement the meager membership fees it collects, the association has sought out external funding from local embassies and other donors but has struggled to obtain funding because they don't fall into a "normal bucket" said one of the founders, a freelancer herself.

Journalists and media who remain in exile over long periods of time will transition from crisis-mode to post-crisis mode, which shares many similarities with high-pressure contexts in terms of multidimensional aspects of precarity and vulnerability.

Key Findings

This research is predicated on the expectation that the exodus of journalists and media workers recently experienced will continue as domestic pressures on freedom of expression increase. As set out above, immediate needs include diplomatic assistance with visas; direct, practical assistance to navigate the new environments to which they have relocated, and psychosocial support for themselves and their families. In addition, and in the longer term and even as global attention wanes, those media outlets which can reconfigure and continue in exile need financial and technical support to do so. They may find themselves operating within a host media sector itself facing political and economic pressures, or subject to transnational repression. Whilst such repression may be enabled by technology, technology also provides outlets opportunities to safely operate a distributed newsroom, maintain links with and report on their countries of origin, reach audiences and even hold authorities to account there — thereby playing a vital role even from afar.

Recommendations

To Donor Organizations and Agencies: Funding and Programmatic Requirements

- Recognize exiled journalists and media outlets as a group with specific needs that is growing in size.
- Support efforts to share information about what those needs are and how they can be met.
- Target support in a way that meets those needs without alienating the media sector in the host country, which may also be experiencing chronic pressure and precarity.
- Support the establishment of regional hubs for the relocation of journalists in distress and exiled media workers that provide logistical and legal assistance as well as opportunities for community building, training, and access to shared resources that support their ability to continue working. Such hubs would require technical input from a range of different organizations.

To Governments and Media Freedom Coalition Member States

- Develop a coordinated diplomatic approach to crises that result in a major news exodus, including evacuation, transit, immigration and asylum processes, as well as domestic programs to allow them to continue working.
- Adopt emergency visa provisions for journalists under threat that will allow rapid relocation and the ability to continue working as a journalist. Implement related recommendations from the High Level Legal Panel on Providing Safe Refuge for Journalists at Risk.



- Create a longer-term visa category for journalists under threat or for temporary protection that grants the right to work, bank, and register. Recognize that these programs will need to include family members.
- Work with neighboring countries or regional hubs to provide emergency transit visas for journalists and their families.
- Explore the feasibility of setting up a global "registration" system to allow media organizations to access international support regardless of domestic legal status.

To Implementers, with Donor Support

- Support journalists in exile, including relocation assistance, psychosocial support, networking opportunities and access to shared resources.
- Increase access to legal support for navigating national registration requirements in all cases but particularly journalists and media in exile as language and system may be new.
- Provide support for outlets to transition to remote operation and re-imagine their business models, including: how to build a digital-first operation, reach sources and communicate safely with those still in country; and how to reengineer editorial and publishing processes. This can include advice and guidance on circumvention technologies and strategies for accessing blocked audiences, both of which are addressed by investigative journalists working in exile here.
- Develop and scale up programming explicitly designed for exiled journalists, including training, networking, access to reporting assignments with international media and collective bargaining opportunities created with each other and representatives from media sectors in host countries.



Coordination & Collaboration

A constellation of coordination networks connects press freedom, media development and journalist support groups, the most effective of which have engaged over the years on acute and longer-term coordination and enjoyed sustained donor funding, as in Syria, Tunisia, and Ukraine. The Global Forum for Media Development conducted a must-read, in-depth assessment and case study analysis of coordination in the media development field that offers detailed recommendations to improve effectiveness and durability, and notes how important it is in the wake of conflict or crisis. Some of the journalists interviewed for this study said they would like to see better coordination among donors and implementers in terms of programming and core support, and that they needed better coordination among the media development community to streamline or use joint reporting processes to lessen the burden on media navigating worsening or crisis situations. Although there is a lack of agreement and clarity in the media assistance community about what coordination means and what its objectives are in the short versus medium and long term, most agree that more and better coordination is needed. Donors need to be part of these efforts in addition to funding them.

Interviews and analysis attribute the success of Ukraine's media sector to the Ukrainians who were on the front lines of advancing a vision for reform, the European institutions that helped define and guide this agenda, as well as the sustained engagement of international donors, such as USAID which has provided consistent support since the 1990s, and media assistance organizations, which remained invested despite limited progress at times, and could thus take advantage of new openings for reform during this tumultuous period. "Ukraine's experience demonstrates the importance of long-term support for media reform," according to an analysis by the Center for International Media Assistance. "For international donors and media assistance actors, the major lesson from Ukraine is that funding for civil society is a long-term investment that requires years of patience and persistent engagement to reap sustainable dividends."

Crisis Coordination

Crises that result in hundreds of journalists needing emergency evacuation and assistance in a short period of time have compelled media support groups to conduct humanitarian rescue operations that demand diplomatic support. Yet a lack of coordination among diplomats

and national security services means that media assistance NGOs have become responsible for lobbying their home governments as well ensuring that states and the UN communicate among themselves while trying to navigate the labyrinth of national immigration laws and visa challenges in host countries and transit countries. The challenge of vetting documents with the security services of potential host and transit countries, figuring out how to move media workers and their families safely to a border, and then how to get them across that first border and onto the final recipient country are intensified by the complexity of dozens of different immigration systems and the mercurial willingness of states to host them.

There are also a range of issues that were raised by study participants that would benefit from coordinated State-level and multilateral advocacy: Emergency visas and asylum; cross-border transport of PPE; registration and legal support for exiled media and journalists; and sustained support for exiled media forced to permanently relocate. The Media Freedom Coalition (MFC) and the



UN Focal Points on Safety of Journalists would be natural venues for coordinating these types of geopolitically challenging diplomatic interventions and assistance and developing a joint strategy, yet have not yet responded to the challenge, according to interviews and observation.

Temporary, emergency visa programs were identified as a priority by the MFC and the Summit for Democracy Media Freedom Cohort. 126 In the wake of recommendations made to the MFC by the High Level Legal Panel in 2020 on improving frameworks for safe relocation, there has been some limited progress in a handful of member states but the consecutive crises over the past two years underscored that far more is needed. 127 However, although the MFC would be the natural place to develop a more strategic approach and provide better diplomatic coordination, its focus on "speaking out" on specific cases rather than holding its members accountable for program delivery has limited its effectiveness and utility. 128 It should emphasize internal accountability and state support for journalists under threat and media needing to relocate through meaningful structural changes rather than just making occasional statements on the most visible cases, according to experts.

A Sectoral Approach to Coordination and Collaboration

As news production has been severed from news distribution and monetization, audiences have shifted online and become accustomed to free content, and digital advertising has replaced much traditional advertising. Media development has focused largely on figuring out how to adapt media to these conditions rather than creating common infrastructure required for public interest media to thrive. This is not because of a lack of awareness, but because donors and ODA tend to be focused on relatively short-term, project focused impacts that can be easily measured and are primarily country focused. The full potential of media development will only be achieved by working collectively to created shared data, learning and research infrastructure to power collective resources, forecasting, and solutions that benefit the sector as a whole and accrue outsized advantages to media partners and policymakers alike.

Adapting to and influencing the information ecosystem means that media assistance must have the data, analyses, and collaborative strategies to not only respond to current challenges but to design for a future in which journalism flourishes. There are nascent efforts underway to develop data collectives, such as the Media Viability Accelerator; ¹²⁹ collective policy learning, such as the Global Forum for Media Development's IMPACT initiative; ¹³⁰ and a proposed Institute for Research on the Information Environment, ¹³¹ but too often the funding and ongoing support needed to make these initiatives durable and effective is not forthcoming. A common infrastructure requires far more investment, strategic and long-term commitment, and trust, and would take time and political will to create and show results.

Yet if one looks to the investments in collective infrastructure made among networked investigative media, the potential impacts are unmistakable. Investigative media have invested in creating shared data repositories, analytic tools, and support services that have resulted in journalism that holds those in power to account, improves democratic discourse and budgets, and reduces corruption, turning such journalism into "a crucial weapon in the defense of democracy." Mounting evidence underscores the effectiveness of this transnational, cross-sectoral, collaborative journalism. From the millions of dollars recovered by investigations like the Panama and Paradise Papers to the revelations about high-level officials and media organizations targeted by Pegasus spyware, to continuing the reporting of murdered journalists, the impacts continue to be felt years after a project concludes. 133

Recommendations

To Governments and Donor Organizations

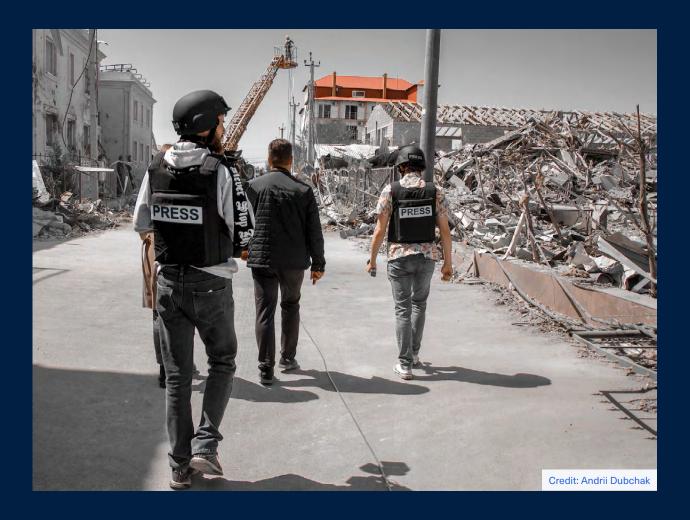
- Fund coordination among the media development and journalism support community using existing mechanisms to avoid creating new or duplicative efforts as coordination takes time, resources, and trust.
- Attend and actively participate in coordination strategy and planning meetings to inform their efforts and provide information to others.
- Allocate significant funds to create collective infrastructure and resources for the sector.
- Consider how domestic policies and regulations, especially with respect to technology, could impact public interest news media.

To Implementers, with Donor Support

- Actively participate in crisis and other media sector coordination groups.
- Create a single centralized and searchable repository of data on press freedom, safety and training, and assessments that are currently buried in reports, academic studies, and proposals or reporting so that it can be analyzed and turned into insights by media outlets and the wider sector and put into conversation with outlet and sector level data to develop better insights into how these factors interrelate.
- Support small media to "combine forces or join existing media marketplaces that aggregate traffic from multiple media companies."¹³⁴ This type of publisher-led news aggregator could similarly aid revenue growth without expecting outlets to develop the expertise or hire dedicated staff.



Create a single repository or partner with an existing one such as Harvard's Lumen database, Access Now's digital security helpline, or another academic institution to receive takedown notices and reports from media outlets to improve understanding of how content moderation impacts news media and how to mitigate these effects. This repository can be cross-referenced with the transparency reports from platforms.



Conclusion

The journalists that media development assistance supports are often driven by a sense of purpose and service as well as a desire to tell stories, particularly of underrepresented people and perspectives. In some cases, the purpose is to inform and serve local communities, such as rural locals, refugees and migrants, or women and minorities because they are not represented, nor their issues and perspectives addressed, in other news media. The passion and dedication of the journalists and media founders interviewed for this report is admirable and inspirational. But democracy cannot run on the fumes of passion.

The media assistance community must prepare urgently for the forthcoming global election cycle and transformational technological changes that have accelerated the need to figure out what generative AI means for the practice of journalism and the threat of MDM, SIOs, and information integrity. It must grapple with the rising threat of generative digital authoritarianism while doubling down on support for independent public interest media. Most media outlets receiving overseas development assistance are still struggling to adapt their business models to the platform era and are unprepared for the imminent generative AI revolution. New safety measures, skill sets, and business models will be needed.

If platforms don't improve the identification of quality journalism sources and incorporate this data into the design of algorithmic systems, the scourge of disinformation, poorly calibrated content moderation systems, and SIOs will overwhelm many of them. And if the main journalism platforms don't help the journalism sector remain financially viable — whether directly through grants or licensing fees or indirectly through improved ad revenue sharing and better content moderation — it seems unlikely that many of the media interviewed for this report will achieve sustainability. Indeed, there is a tension expressed by some of the founders of independent media outlets who have had long careers in journalism: how to reconcile business imperatives with the ultimate goal of practicing journalism in the public interest?

Donor governments must advocate with their diplomatic counterparts to push back on closing civic space, repressive laws, and attacks on journalists and independent media. But they must also advocate internally for emergency visas and ensure their own government and policies are not inadvertently putting additional pressure and restrictions on media freedom and sustainability.

This means addressing the role that US and European policies play in the global information ecosystem and adopting a more comprehensive approach to foreign assistance that includes addressing domestic immigration and technology policy frameworks. But creating emergency visas for journalists, updating rules on cross-border transfer of PPE, or getting regulators to mandate that platforms protect independent public interest media from being caught up in algorithmic content moderation systems will require a great deal of political will and a strategic, whole-of-government approach to creating an enabling environment for public interest journalism around the world.

This research contributes to a growing body of evidence that sustainable, public interest news media are a public good, meaning that policy solutions need to grapple with the fact that public goods are typically not adequately provided for by the market (absent compelling government-mandated incentives). Furthermore, with few exceptions, public service journalism has rarely been provided in an economically sustainable way without significant subsidies, concessions and/or protections. "Who wakes up in the morning and says I want news from marginalized communities?" asked the founder of an Indonesian media outlet. "You don't often come across people who wake up in the morning saying I want to make a better decision in the next election coming up," observed another study participant.

As the media assistance community grapples with how to create healthy information ecosystems that make free, representative politics possible and foster just economic conditions, it must also acknowledge that independent sustainable news media systems are the exception in most of the world, not the rule. Public interest media provide a dual public service — informing and educating while also creating a space for discussion that can also inform the wider media system and public policymaking. Turning these endeavors into sustainable revenue-generating businesses is likely to remain a challenge without significant investment in shared infrastructure, collective resources, and improved relationships with tech platforms.

Media assistance must design for the future problems not just those of today. Without bold strategies, more money, and a collective infrastructure for research and development, independent public service media could wither away in many countries. The resulting news deserts will mean a less informed public, less accountable people in power, and less democratic governance.

Acknowledgments

This research is informed by two decades working with journalists and media organizations around the world. It is grounded in scholarship based on a commitment to empirical, human-centered, feminist research that centers the Majority World.

The author wishes to thank the journalists, freelancers, and media founders who agreed to be interviewed for this report, many of whom asked not to be identified, and the following organizations for providing access to their staff and experts for interviews, informal discussions, assistance distributing the survey, and/or key documents and research for this report:

Access Now, ACOS Alliance, Ahval, Al-jumhuriya, Al Qatiba, Alliance of Independent Journalists, Association for Media Women in Kenya, Association of Caribbean Media Workers, Association of Participatory Programs and Radios of El Salvador (ARPAS), Association for Progressive Communications, ARTICLE 19, Azerbaijan Internet Watch, BBC Media Action, Burma News International, Caribbean Investigative Journalism Network, Center for International Media Assistance, Centre for Law and Democracy, Coalition Against Online Violence, Coda Story, Committee to Protect Journalists, Communication and Information for Women (CIMAC), Counter Academy for Arab Journalism, Derechos Digitales, Deutsche Welle Akademie, Dream FM, En Frontera, Enab Baladi, European Journalism Center, Factum, Falso, Febrayer Network, Foundation Hirondelle, Free Press Unlimited, Freedom House, Frontline Defenders, Frontline Freelance Registrar, GFMD, GIJN, Global Network Initiative, Hashtag Our Stories, Homosensual, INK Centre for Investigative Journalism, International Center For Journalists, International Centre for Not-For-Profit Law, IFEX, International Federation for Journalists, Index on Censorship, International Journalism Festival, International Media Support, International Press Institute, International News Safety Institute, Internews, Institute for War and Peace Reporting, Irawaddy, IREX, Isaan Record, iStories, IWMF, Karisma, Knight Center, Kickstarter, Kyiv Independent, La Silla Vacía, Lviv Media Forum, Maharat Foundation, Media Defense, Media Foundation for West Africa, Media Institute of Southern Africa, Mizzima, MLDI, Namibia Trust, New Narratives, Organized Crime and Corruption Reporting Project, Oxford Internet Institute, Pakistan Press Foundation, Panos Institute Southern Africa, Pen America, Project Multatuli, Revista Gato Encerrado, Reuters Institute for the Study of Journalism, Rory Peck Trust, Reporters Sans Frontières, Southeast Asia Freedom of Expression Network, Sahara Reporters, Sembra Media, Skeyes, Splice Media, Syrian Female Journalists Network, Tempo, The New Humanitarian, The Source, Thomson Reuters Foundation, Union Tunisienne des Médias Associatifs, WAN-IFRA, Zamaneh Media.

Special thanks to Isabelle Schlaepfer for her assistance with the survey and survey analysis, Rosie Parkyn, and other Internews colleagues who provided helpful feedback and suggestions.

This research was supported by Internews and benefitted from complimentary research conducted over the past year by the author that was supported by the ACOS Alliance, the Center for International Governance Innovation, GFMD, and the National Endowment for Democracy.

Glossary

DMCA: Digital Millennium Copyright Act which criminalizes production and dissemination of technology, devices or services intended to circumvent measures that control access to copyrighted works.

Financial gateways: components of the digital infrastructure that supports international trade, commerce, and financial transactions that provide secure and reliable payment processing capabilities, enabling them to participate in the global economy and access financial services across borders and accept or make payments in multiple currencies.

Influence operations: a collective term for contemporary propaganda, disinformation, and online harassment campaigns that leverage the design of information communication technology platforms and the Al-fueled content moderation systems that undergird social media.

MDM: Mis-information (information that is false, but not created with the intention of causing harm), Dis-information (information that is false and deliberately created to harm a person, social group, organization or country, and Mal-information (information that is based on reality, used to inflict harm on a person, organization, or country).¹³⁶

Overseas Development Assistance (ODA): government aid that promotes and specifically targets the economic development and welfare of developing countries.¹³⁷

Platformatization: the penetration of digital platforms and their economic, political, and infrastructural logic into the information ecosystem in ways that fundamentally affect the operations, business strategies, and editorial choices of the journalism field.

Participants: inclusive of interviews, survey respondents, and others who contributed to the research.

Right to be Forgotten: the right to have private information about a person removed from Internet searches, currently in practice in several jurisdictions.

Appendix A: Tech Policy Recommendations

The viability of local media and the extent to which communities have access to high quality information at community level is impacted across all three contexts by the digital infrastructure in which local media are obliged to operate, the actions and choices of global technology platforms, and the decisions of those who regulate them. Given this, actions that platforms and regulators would ideally take to minimize negative impacts cut across all three contexts and are therefore included here as an appendix.

To Platforms

- Improve the identification of quality journalism sources and incorporate this data into the design of algorithmic recommendation and ranking systems. Incorporate better labeling, hashing, and other improvements to algorithmic automation by platforms to protect journalistic coverage and expand the impact of factchecking initiatives. These efforts should be based on civil society-led, multistakeholder initiatives to identify quality or trustworthy news media and existing frameworks such as professional associations and press councils.
- Improve content moderation and recommendation systems to improve findability online
 of local and independent media, including elevating local news to global audiences
 when their communities are in the news.
 - Use these signals to provide a suite of safety and optimization benefits.
 - Protect legitimate, credible news outlets from getting blocked and allow them to continue to monetize digital advertising.
 - Ensure that all partners and funding recipients receive verification on their platforms and access to core news publisher services and products.
- Improve copyright protection and enforcement on behalf of news media and to deter fake news farms.
- Ensure appropriate resources are devoted to each country in which a company operates, including AI and ML resources, language and country experts, and trust and safety expertise.
- Reduce the vulnerability of automated systems to abuse by political actors and for-profit

- companies and improve verification systems for claims alleged against news media organizations.
- Take proactive measures in advance of national and local elections to deter coordinated state-aligned campaigns, online harassment, and other information operations.
- Provide notice-and-takedown requests in the local language of the alleged violation.

To Policymakers and Regulators

- Policymakers should require the tech industry to provide data, research support, and greater transparency, which would serve a broad range of goals including those related to media sustainability.
- Mandate transparency of DMCA and other types of takedown requests to enable research and analysis (see recommendation in common infrastructure).
- Require platforms to provide greater transparency about all types of advertising and paid content promotion, not just about political advertising in a handful of Western countries. This could be implemented through existing election laws and paid advertising regulations, and should apply to both the supply side and the platforms.
- In the absence of meaningful improvement of content moderation and recommendation systems regulators should step in to require platforms improve measures to prevent the weaponization of their platforms to target journalists and news media.
- Require more information about the allocation of platform resources to support content moderation in relevant languages on their platforms, and commit to improving natural language processing and Al systems for underrepresented languages in countries where they operate profitably.
- Impose more robust transparency requirements on social media platforms with respect to content moderation and curation, algorithmic decision making, use of AI systems and the datasets and languages, and country operations. This would include requirements related to the sharing of internal research as well as a framework for external independent research and audits.
- Require that social media platforms report takedown and DMCA requests to the Lumen research database and report on news-related content moderation in their transparency reports.

Appendix B: Expanded Recommendations for Financial Sustainability

This report finds that there is no single business model for media that can be affective across different political environments and markets — and there are markets in which no business model is viable. Nonetheless, it is possible to provide technical support, create and make available generic tools and resources, and support processes which help to improve the business performance of different types of media outlets across a wide variety of contexts, including the three examined in this report. More detail is offered below:

Foster a better understanding of market and organizational characteristics so that relevant performance benchmarks and targets for local media can be better understood by donors.

New initiatives are currently emerging that enable local media to participate more effectively in the global marketplace, adapt to market changes and attract technical and financial support that better meets their specific needs and objectives. The Media Viability Accelerator will provide media outlets with data on their business performance, benchmarking which shows how this compares with their peers and actionable insights which enable them to improve performance. It will also raise their visibility with funders, media development organizations, software providers and consultants who can identify and support to achieve their goals.

Support processes to embed data into strategic and operational decision-making wherever beneficial to a media outlet or information provider to do so.

Media outlets have access to audience and business data that can help strengthen their business strategies and understand the relationship between audience scale, engagement, retention, and monetization, but many find themselves without the resources and capabilities to apply insights from these data. Why are media outlets not prioritizing data practices that could help them become more sustainable? The provision of training and ongoing support in utilizing tools to measure and monitor audience channels (e.g., search engine, social media, print and broadcast) and business performance (e.g., organizational capabilities and financial tracking) is strongly desired and should be integrated within a holistic package of support, which includes ensuring media outlets can institutionalize these behaviors post-intervention.



Support to use products and services and adapt quickly when those change.

Whilst the URGENT report stresses the disadvantage of collective over-reliance on a small number of technology platforms with whom highly unequal power relations exist, as well as the risk to quality journalism of the need to play to the algorithm, news media must also be pragmatic and take full advantage of new products and services available to them, such as <u>Google's Accelerated Mobile Pages</u> (AMP) and the <u>Meta Journalism Project Accelerator Program</u>.

Staying ahead as these products and services evolve at rapid pace requires specialist expertise not typically found in-house in small and medium-sized media outlets. Donors could invest in organizations who can provide such expertise across media sectors, supporting outlets to gain access, enroll and register in the first instance, also funding the creation of collective resources in multiple languages.

Provide core funding that enables flexibility and investments which will support resilience and growth.

Business development, tech and innovation, audience or marketing, analytics and administrative roles are essential but often under- or unfunded in donor-supported media, with many participants in the research listing these types of roles as a priority should they gain access to unrestricted funding. Such roles also pay off: SembraMedia found that news startups led by journalists in Asia, Africa and Latin America that had at least one dedicated sales or business development person on staff earned six to nine times more revenue than those who did not.¹³⁸

In addition, building consumer-driven revenue streams such as donation, subscription and membership programs takes financial and technical infrastructure. Both require Customer Relationship Management (CRM) systems and ongoing administrative and technical support to work effectively, a logistical and budgetary hurdle that also carries its own safety considerations. Selecting and budgeting for CRMs can be complicated and needs the ongoing support of all staff to be effective, ¹³⁹ but is fundamental to building community and audience independently of social media platforms.

Support the development of diverse revenue streams to increase resilience, and adaptation of the business model when crisis emerges.

Each outlet will have different revenue opportunities available to them depending on their size, target audience, editorial perspective and the market and political context in which they operate. These are evidently more limited in low income or highly repressive settings, and



may disappear or require adaptation when crisis hits. In addition, the local legal framework and financial infrastructure including the availability of payment platforms will play a significant role. Nevertheless, there are some tried and tested revenue streams that outlets can be supported to experiment with. The most common include:

- commercial advertising (increasingly, this is digital advertising)
- sponsorship and paid-for content
- membership and subscription models, and less reliable offshoots crowdfunding, tipping and one-off or irregular donations
- the provision of consultancy and content production services
- an increase in factchecking activity
- experiential programming (ticketed or community-focused events with the attendant benefit that they create opportunities to strengthen relationships with audiences)
- government funding: tax breaks, subsidy, and advertising
- engagement in publisher-led news aggregators

Dedicated expertise which helps outlets to discover and realize these opportunities can be provided as part of a holistic package of support and is a key aspect of building resilience beyond funding provided on a project-by-project basis. In addition, donors could support small media to "combine forces or join existing media marketplaces that aggregate traffic from multiple media companies." This type of publisher-led news aggregator could similarly aid revenue growth without expecting them to develop the expertise or hire dedicated staff.

Support dedicated efforts to explore how the next generation of the internet, including Artificial Intelligence and the Metaverse, will impact independent media, and how they can create new opportunities in these areas.

The media development community should be partnering with technologists, local journalism practitioners and academics to explore how recent advances in generative AI can be leveraged by small newsrooms and to power collective resources and solutions, and also how risks to local language information production can be understood and addressed. From research and collective learning to article generation and data analysis, advances in AI may pose huge opportunities whose full potential can only be achieved by working collectively to create shared data, learning and research infrastructure across and among independent media restricted contexts.

Endnotes

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- 7 See author note and acknowledgments.
- 8 Abbas Tashakkori and Charles Teddlie, *Mixed Methodology: Combining Qualitative and Quantitative Approaches.*, Mixed Methodology: Combining Qualitative and Quantitative Approaches. (Thousand Oaks, CA, US: Sage Publications, Inc, 1998).
- The author reviewed recommendations from media development and journalism organizations drawn from reports that were based on the perspectives of journalists and media organizations as well as a review of the academic literature on media viability/sustainability and qualitative country/regional studies that were largely based on qualitative data gathered from journalists and media organizations in aid recipient countries to capture additional perspectives from journalists and media workers.
- Initially the research was conceptualized with three categories of countries as the starting point for enquiry and guiding framework for data collection and analysis: 1) pressure building 2) fast pivot to worsening and 2) regional influencer/lynchpin. However, early on interviews revealed that the third category was not salient and that exiled journalists and acute crisis were more relevant, meaning that these categories must be treated as highly porous, interrelated, and not entirely helpful as an analytical framework with respect to the third category. In particular, Indonesia was originally classified as lynchpin, but interviews indicated that it belonged in the pressure building category, while a category of exile/migratory hosts proved to be more accurate and relevant. Furthermore, fast pivot to worsening and crisis were too similar and interrelated to be distinguished as separate categories.
- 11 These were: Colombia, El Salvador, Kenya, Indonesia, Mexico, Thailand, Tunisia, and Ukraine.
- 12 The exiled research focused on 2019 onward due to a foundation report by exiled media.
- 13 For example, journalists who work under the three condition types or who work with journalists in those three country types.
- 14 A special thank you to the Committee to Protect Journalists, the Global Forum for Media Development, the Global Investigative Journalism Network, the International Women's Media Foundation, the Organized Crime and Corruption Reporting Project, SembraMedia, and Tempo Group.
- 15 Not every respondent answered each question due to skipping logics in the survey.



- 16 33 were from priority countries.
- 17 These included the International Journalist Festival in Italy, RightsCon, and the International Press Institute World News Congress.
- 18 See Author's Note.
- For more on the methodology of embodied and virtual ethnography, see Courtney C. Radsch, *Cyberactivism and Citizen Journalism in Egypt: Digital Dissidence and Political Change*, Information Technology and Global Governance (Palgrave Macmillan US, 2016), https://doi.org/10.1057/978-1-137-48069-9.
- 20 Such as fully public, semi-anonymous, or fully anonymous.
- 21 For example, there are many stand-alone reports on specific countries, countries in crisis, exiled journalists, coordination, business models, technology and journalism, and the like. Most of these tend to be around 30 pages.
- Although participants were interviewed independently, any many expressed critical perspectives, the power dynamics involved in this relationship may have influenced some people's willingness to provide candid responses.
- 23 Interviews were conducted in English, Spanish and French and the survey was conducted in Arabic, English, French, Spanish, Ukrainian, and Russian.
- 24 Just under 40% of survey respondents freelance for multiple outlets and 70% identified as staff.
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Annex I:

Expanded Recommendations and Guidance for Digital and Organizational Preparedness

Preparing an organization or individual for crises both digitally and organizationally is a complex task that must consider their unique context and threat landscape. However, some general guidance for crisis preparedness can be useful to begin generating a plan of action and to focus limited resources on those essential tasks or high-risk areas. The recommendations noted above and expanded upon below are based on industry best practices as well as the National Institute of Standards and Technology's Common Security Framework (NIST CSF)¹⁴⁰ and the Center for Internet Security's Controls (CIS Controls V8).¹⁴¹ Most organizations around the world, both big and small, base their information security programs on either the NIST CSF or the CIS Controls.

Hardware and Software Asset Management

Managed control of all organizational assets plays a critical role in security monitoring, incident response, system backup, and recovery. Organizations should know what hardware and data are critical to their work. Proper asset management will help identify those assets that hold or manage this critical data, so that appropriate security controls can be applied. Additionally, the asset management discovery process will identify all assets that require monitoring and protection as well as rogue or unmanaged assets that require removal or support. Furthermore, this process will help ensure only authorized software is installed and that unauthorized software is identified and prevented from installation or execution. Identifying and documenting critical assets and data, prior to a crisis, prepares the organization to efficiently prioritize these assets in the case of a data security incident, business disruption, or disaster.

A complete software inventory is critical for system recovery following a crisis as well as preventing cyber-attacks. Threat actors scan target organizations looking for vulnerable software to remotely exploit. For example, if a user accesses a malicious website or open a malicious file with a vulnerable application, an attacker could install malware giving them long-term control of the system. Threat actors can then begin moving laterally through the network accessing files and folders throughout the organization. Without a complete inventory of software assets,

an organization cannot determine whether they have vulnerable software.

A complete software inventory includes the following:

Data Mapping

Draft a document that enumerates all user accounts, file storage locations along with the data criticality and type stored therein, web domains, and other digital assets. Note where they exist, who accesses those assets, and how they are accessed.

Implement "Secrets Management"

All passwords, encryption keys, backup security tokens, and other methods to ensure secure access to organizational assets are both maintained and limited to only correct stakeholders.

Backup and Store Vital Software Components

Create a secure data storage repository to store and backup software license information and data recovery keys and methods.

Data Protection

Data has expanded beyond the organization's brick and mortar infrastructure. An organization's data may be stored in the cloud, on mobile phones or laptops, and is often shared with partners or online services located anywhere in the world. In addition to sensitive data related to finances, intellectual property, and customer data, there may be international regulations for the protection of personal data.

Data security and privacy have become increasingly important and complex. Data must be appropriately managed through its entire life cycle. Security and privacy regulations and controls are complicated for organizations of any size; however, there are fundamental best practices applicable to organizations of all sizes.

Establish and Maintain a Data Management Process

In the process, address data sensitivity, data owner, handling of data, data retention limits, and disposal requirements, based on sensitivity and retention standards for the organization. Review and update documentation annually, or when significant organizational changes occur.

Configure Data Access Control Lists

These are lists based on a user's need to know. Apply data access control lists, also known as access permissions, to local and remote file systems, databases, and applications. This can be established through models such as Using Role-Based Access

control (RBAC), and — possibly for more elevated administrator user levels — Attribute Based Access Control (ABAC).

Set and enforce Data Retention Policies

Retain data according to the organization's data management process. Data retention must include both minimum and maximum timelines.

Securely Dispose of Data

Securely dispose of data as outlined in the organization's data management process. Ensure the disposal process and method are commensurate with the data sensitivity.

Encrypt Data on End-User Devices

Encrypt data on end-user devices containing sensitive data. Example implementations can include: Windows BitLocker®, Apple File Vault®, Linux® dm-crypt.

Malware Defense

Malware is ever evolving, but its sole function is to capture credentials, steal data, identify other targets, and encrypt/destroy data. Organizations must deploy malware defenses at all possible entry points and enterprise assets to detect, prevent spread, or control the execution of malicious software or code.

Most organizations implement "defense in depth" security controls to further reduce the likelihood of an attack. This layered defense approach includes technical controls such as firewalls equipped with Intrusion Detection Systems (IDS) or Intrusion Prevention Systems (IPS), email security, web proxy, VPN, as well as administrative controls such as policies and security and awareness training. Given the limited budgets of some organizations, this layered approach isn't a possibility unless funding and technical support is provided by a third party. Therefore, at a minimum, the organization must require an antivirus or Endpoint Detection and Response (EDR) application installed on every laptop, desktop, and server.

Data Backup Policy and Procedure

The following is a non-exhaustive list of elements that should be included in a Data Backup Policy and procedure. This policy must then be operationalized through a procedure to help ensure data is backed up and restored in accordance with policy requirements.

Backup data specifications

Classify data by criticality (i.e., High, Medium, and low). Classifications can be based on the sensitivity of the data or the importance the data has to the business whether

that be intellectual property or business operations.

Schedule and frequency

The frequency between your backups shouldn't be more than the time you are willing to spend on any rework due to the lost data. Backup schedules can and should be in line with the criticality of data. For example, data classified as critical may be backed up every 24 hours whereas data classified as low is backed up every seven days.

Roles and responsibilities

Assign clear roles and responsibilities to ensure backups are run as per schedule, backup jobs are validated, backup status is reviewed, and retention requirements are met.

Backup method

Backup you data using the Full/Differential/Incremental method.

Security controls

Implement data encryption and Role Based Access Control to restrict unauthorized access.

Storage locations

Ideally, an organization should have both on-site and off-site backups (cloud) as a part of its strategy. The organization should the risks to personnel and the business when decided backup storage locations.

Failover solution

In the event that the primary data backup solution becomes unavailable (internet shutdown, technical failure, etc.), a backup process automatically switches to a standby system (possibly local hard-drive backup).

Retention periods

The retention period determines the period for which a backup is maintained. Organizations should consider business requirements, type of data, and industry compliance and regulations before determining retention periods.

Recovery procedures

Recovery point objective (RPO): The RPO is the maximum amount of data an organization can stand losing following an outage or data loss.

Recovery time objective (RTO): The RTO is the maximum time an organization sets before it restores normal operations in the case of an outage or data loss.

Business Continuity Plan and Disaster Recovery Plan

A Business Continuity Plan (BCP) involves assessing the risks to organizational processes and

creating policies, plans, and procedures to minimize the impact those risks might have on the organization if they were to occur. The BCP is used to maintain the continuous operation of a business in the event of a business disruption. The goal of the BCP is to have a process in place so that a potentially disruptive event has as little impact on the business as possible.

The BCP focuses on maintaining business operations with reduced or restricted infrastructure capabilities or resources. If the continuity of the organization's ability to perform its mission-critical work tasks is maintained, the BCP can be used to manage and restore the environment. The BCP process has four main steps:

- 1. Project scope and planning
- Business impact analysis
- 3. Continuity planning
- 4. Approval and implementation

Drafting a BCP requires buy-in from individuals and departments across the organization. The BCP is often championed by IT and facilities management with the assistance from third party consultants or partners.

The Disaster Recovery Plan (DRP) is the technical complement to the business focused BCP. It includes the technical controls that prevent disruptions and facilitate the restoration of service as quickly as possible following a disruption. Together, the Disaster Recovery and Business Continuity Plans guide the actions of emergency-response personnel until the end goal is reached — the business restored to full operating capacity in its primary operating facilities.

The DRP should consist of the following requirements at a minimum:

- 1. Roles and responsibilities
- 2. Team communications (call tree, out of band communication methods, etc.)
- 3. Restoration Procedures (the most critical assets will be restored first).
- 4. Recovery facilities (where the organization will meet to continue their work)
- 5. Testing mechanisms of the Plan

Risk Assessment

Asset Based Risk Assessment

Once an inventory of threats and assets (human, hardware, or software) is developed, then each threat and asset pair must be evaluated, and its related risk calculated or assessed. There are two primary risk assessment methodologies: quantitative and qualitative. Quantitative

risk analysis assigns a financial value to the loss of an asset. Qualitative risk analysis assigns subjective and intangible values to the loss of an asset. Both methods are necessary for a complete perspective on organizational risk. Most environments employ a hybrid of both risk assessment methodologies to gain a balanced view of their security concerns.

Contextual Based Risk Assessment

Contextual risk assessments refer to events, factors, or dynamics occurring in the broader environment which affect programming or operations. These risks are beyond the control of organizations or individuals. This type of risk assessment examines the operational environment and the underlying political, social, cultural, and economic factors that define it. This environment then looks to the risks faced to an organization or individual operating in that environment. Areas of analysis may include, legal/regulatory risk, state surveillance, censorship, and targeted attacks on the media. As with all risk assessments, the analysis focuses on the impact and likelihood of the event occurring.

Incident Response Plan

The Incident Response Plan provides the methodology and process for responding to an incident. The response varies depending on the severity of the incident. Many organizations have a designated incident response team — sometimes called a computer incident response team (CIRT) or computer security incident response team (CSIRT). The organization activates the team during a major security incident but does not typically activate the team for minor incidents. A formal incident response plan documents who would activate the team and under what conditions. Team members are trained on incident response and the organization's incident response plan. Typically, team members investigate the incident, assess the damage, collect evidence, report the incident, and perform recovery procedures. They also participate in the remediation and 'lessons learned' stages and help with root cause analysis.

The below information is a summary of what should be included in an Incident Response Plan. Organizations should consult NIST's SP 800-61 Rev. 2 Computer Security Incident Handling Guide or a trusted third party to draft their plan.

Designate Personnel to Manage Incident Handling

Designate one key person, and at least one backup, who will manage the organization's incident handling process. Management personnel are responsible for the coordination and documentation of incident response and recovery efforts and can consist of employees internal to the organization, third-party vendors, or a hybrid approach. If using a third-party vendor, designate at least one person internal to the organization to oversee

any third-party work. Review annually, or when significant enterprise changes occur.

Establish a process to respond to an incident

The incident response process, generally, includes the following phases — (1) Preparation; (2) Detection and Analysis; (3) Containment, Eradication, and Recovery; and, (4) Post-incident activities. Each one of these phases requires trained personnel to perform.

Establish and Maintain Contact Information for Reporting Security Incidents Establish and maintain contact information for parties that need to be informed of security incidents. Contacts may include internal staff, third-party vendors, law enforcement, cyber insurance providers, relevant government agencies, Information Sharing and Analysis Center (ISAC) partners, or other stakeholders. Verify contacts annually to ensure that information is up-to-date.

Establish and Maintain an Enterprise Process for Reporting Incidents

Establish and maintain an organization process for the workforce to report security incidents. The process includes reporting timeframe, personnel to report to, mechanism for reporting, and the minimum information to be reported. Ensure the process is publicly available to all of the workforce. Review annually, or when significant enterprise changes occur.

Recommendations for Digital and Organizational Preparedness for Emergency and Disaster Situations

- To reduce the threat of a data security incident (e.g., ransomware, data breach, etc.), the organization must prevent or control the installation, spread, and execution of malicious applications, code, or scripts on its assets.
- Maintain inventory and control of organizational assets (both hardware and software) by actively managing (inventory, track, and update) all organizational assets (e.g., end-user devices, network devices, Internet of Things (IoT) devices, servers, operating systems, and applications) connected to the organization's infrastructure. Establish appropriate data protection for the organization, develop processes and technical controls to identify, classify, securely handle, retain, and dispose of data.
- Draft and approve a Data Backup Policy that takes into consideration data type and criticality of hardware/software, schedule and frequency of backups, roles and responsibilities, backup method, security controls, storage locations, retention period, and recovery procedures. Drat and approve an Incident Response Plan that addresses how the organization will respond to data security incidents.
- Draft and implement Disaster Recovery and Business Continuity plans that address

the preparation, processes, and practices required to ensure the preservation of the organization in the face of major disruptions to normal organization operations. Perform qualitative and quantitative risk assessments to identify risks (organizational, operational, human, asset) and rank them in order of criticality. Risk prioritization will guide the organization to optimize the use of limited resources to address the most significant threats prior to those just above the risk acceptance threshold. Include disaster preparedness in tailored digital security trainings.

- Registration, banking & other logistics: Consider opening a bank account and obtaining registration in another country, noting the following potential challenges: that either or both may take many months to obtain from outside the target country and may require significant resources and expertise in banking, media law and taxes, and that media may face restrictions on their ability to register abroad. Ensure that essential organizational and individual paperwork is in order (see GIJN list).
- Make sure you have a valid passport.