

Review of the implementation of the  
Beijing Platform for Action in the EU Member States.  
**Advancing gender equality in decision-making  
in media organisations**

# Malta



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# Introduction

EIGE's Report 'Advancing gender equality in decision-making in media organisations' reviews the implementation of the Beijing Platform for Action (BPfA) in the Member States and introduces the first indicators to measure the progress of gender equality in the area of women and the media. The report was prepared to support Irish Presidency of the Council of the EU (the first half of 2013). The report is available online at [www.eige.europa.eu](http://www.eige.europa.eu)

The report explores the extent to which women occupy decision-making positions across a sample of media organisations in the 27 Member States and Croatia. It also aims to identify the extent to which these media organisations have developed gender equality policies, the mechanisms that are in place to monitor such policies and the kinds of specific initiatives which exist to further support the career development of women within the sector. Studies of women's employment experiences suggest that organisations that have adopted positive action strategies such as mentoring, leadership programmes and the formalisation of monitoring mechanisms, including equality committees, are also more likely to recruit and promote women into senior level positions. In other words, there seems to be a positive link between policies developed within media organisations to promote gender equality, and the proportion of women in decision-making roles, providing a rationale for looking at both of these elements together. In addition, insights into what helps and what hinders women's career prospects are important issues to explore. The report draws on some of the testimonies provided by senior women media practitioners who were interviewed for the study.

The following document presents the collected data and is available for Malta compared to EU-27 in average.

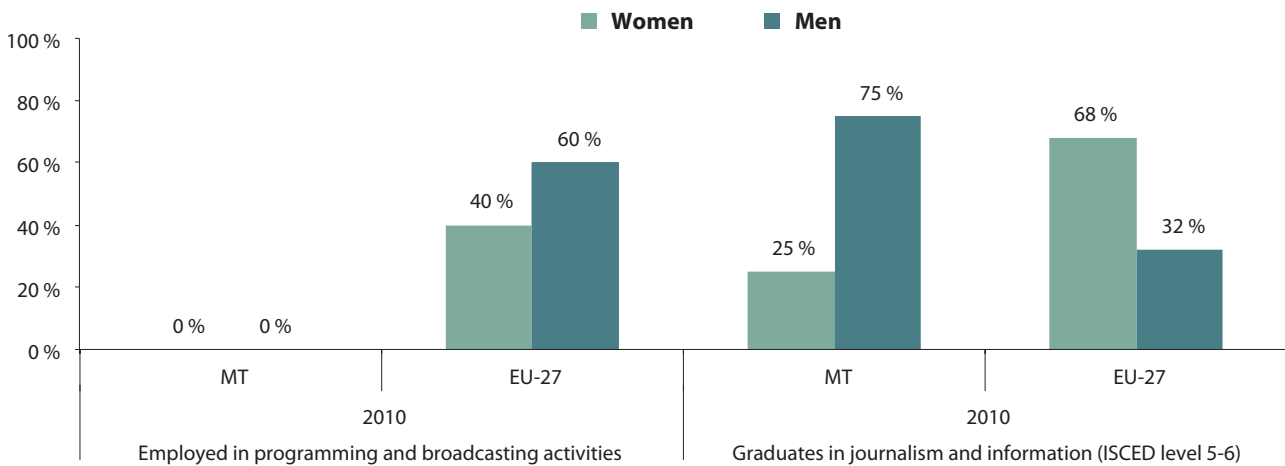
# 1. Research findings

## 1.1. Women in the media challenging the glass ceiling

Proponents of gender equality have long understood that media access is important and can serve as a key resource to promote the advancement of women. It is believed that this can be achieved, in large measure by increasing the number of women professionals working in the sector.

Looking at the recent employment trends at the EU level, one can see that, on average, women make up nearly half the workforce within media industry and account for more than half of tertiary level graduates for media-related careers. Despite of this positive trend among women's presence in the media sector, it continues to be male-dominated in most of the EU Member States and Croatia.

**Figure 1: Women and men employed in the media sector and graduates in journalism and information**



Source: Eurostat, LFS (lfsa\_egan22d), Eurostat, Education Statistics (educ\_grad5) (See Fig. 1.1 and Fig. 1.2, p. 16-17 in the main report).

NB: Employment data are not available for MT.

Looking at the recent employment and educational attainment trends in Malta, 25 % of tertiary level graduates for media-related careers are women.

In spite of the increased number of women employed in the media sector, persistent patterns of inequality in the form of under-representation, glass ceiling barriers to advancement, and low pay (in relation to men) still remain firmly embedded within the media sector.



## 2. Data Collection and Analysis

### 2.1. Methodology for data collection

The data collection was carried out by a team of selected senior researchers from each Member State and Croatia and coordinated by the three senior researchers and managers of the project. National researcher that ensured the data collection for Malta is Brenda Murphy (University of Malta).

In total, 96 media organisations were surveyed across the 27 Member States and 3 in Croatia. The survey sampled the public service broadcasters, together with a range of large-scale private media organisations.

The private media organisations chosen were based on: the size of the organisation (in terms of workforce), popularity of service or product (e.g. audience ratings for TV and radio; circulation for newspapers) and importance (e.g. in terms of opinion-forming). Also, due to the necessity to limit the number of organisations from one country, a selection was done based on multiple criteria. For example, when a newspaper had a high circulation but a small workforce, or where several TV stations claimed to be the 'most popular' but where verifiable data on ratings was impossible to obtain.

The sample for any one country had to contain the public service broadcaster and up to three private organisations, depending on media density. In most countries, the private media selected comprised of at least one newspaper and at least one TV station. Radio stations were included in countries where radio was particularly popular, in high-media density countries, or where the public service broadcaster split TV and radio into two separate operational structures.

**Table 1: Media organisations surveyed in Malta**

Organisation	Type	Funding	Source of data	Rationale for Inclusion (private)
ONE TV	TV	Private	<a href="http://www.one.com.mt/index.php-id=2067">http://www.one.com.mt/index.php-id=2067</a> ; <a href="http://www.maltesering.com">http://www.maltesering.com</a>	Largest private TV station (audience)
Radju Malta	Radio	Public	Head Research & Communications, Broadcasting Authority	
TVM	TV	Public	<a href="http://gov.mt/en/Government/Government%20of%20Malta/Ministries%20and%20Entities/Officially%20Appointed%20Bodies/Pages/Companies/Public-Broadcasting-Services-Ltd-(PBS)-.aspx">http://gov.mt/en/Government/Government%20of%20Malta/Ministries%20and%20Entities/Officially%20Appointed%20Bodies/Pages/Companies/Public-Broadcasting-Services-Ltd-(PBS)-.aspx</a>	
The Times	Newspaper	Private	<a href="http://www.financemalta.org/content.aspx-id=272502">http://www.financemalta.org/content.aspx-id=272502</a> ; Fiona Galea Debono; HR Manager Matthew Naudi;	Highest circulation

### 2.2. The gender equality of decision-making in media organisations

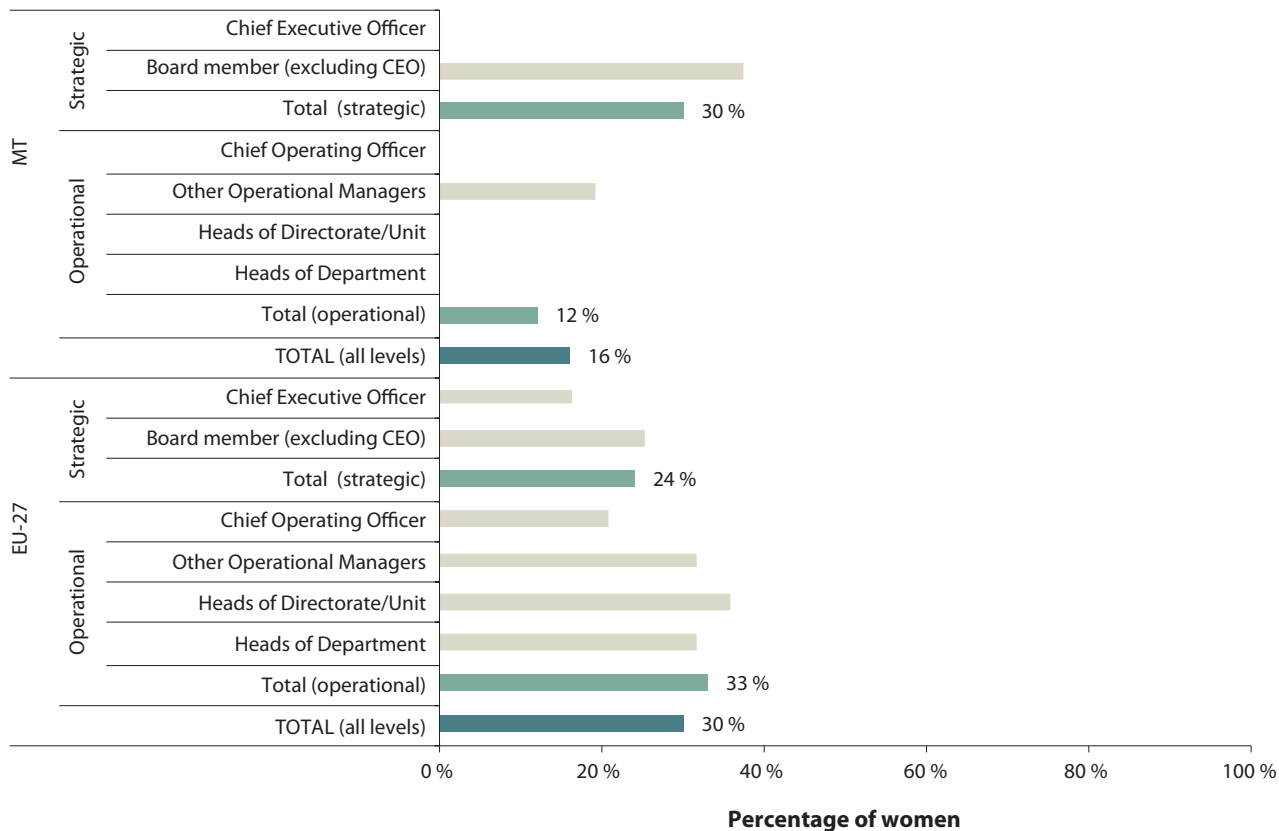
The influential nature of the media industry informing public opinion underlines the need to address the representation of women in high-profile, decision-making posts. Substantial progress has been made in the area, with women occupying the field in greater numbers, and often out-numbering men on journalism courses. However, the issue of representation of women at the top levels remains a key concern.

Collected data provide an overview of the degree to which women held decision-making positions in media organisations. The five different levels of management structure identified within the organisations were categorised as strategic level (Chief Executive Officer and members of the board) and operational level (Chief Operating Officer, other Operational Managers, Heads of Directorate/Unit and Heads of Department).

The data show that overall, in the selected media organisations from the Member States, across all management levels, women constitute around one-third (30 %) of senior staff placed in decision-making positions. However, when this

composited figure is disaggregated into its component parts, it is clear that the representation of women in decision-making posts increases as the level of the position decreases.

**Figure 2: Percentage of women in decision-making positions and on boards, 2012**



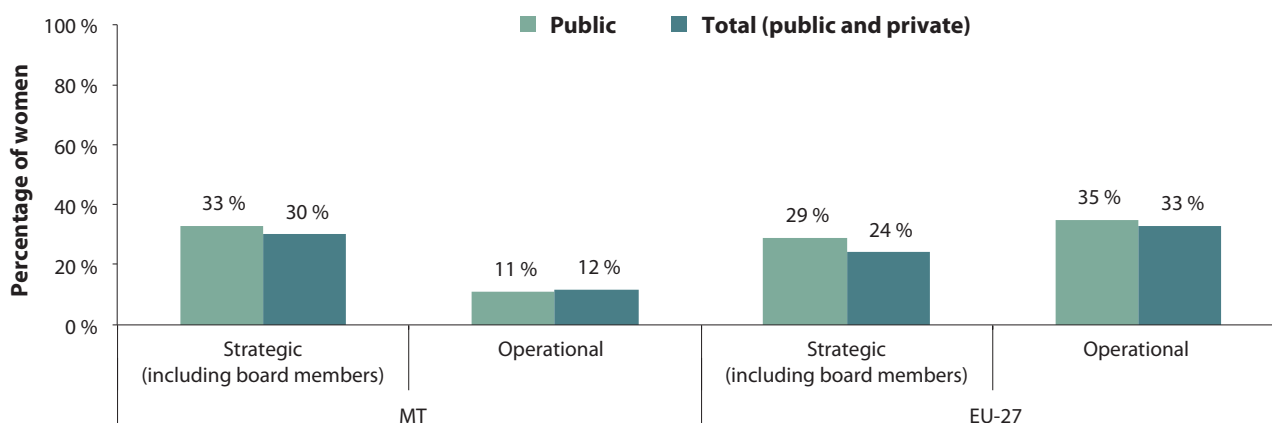
Source: Data were collected in July-September 2012 (See Fig. 2.1, p. 26 and Table 1, p. 91 in the main report).

NB: The risk of double-counting individuals who could have had more than one role within the organisation was avoided by counting the person and not the position. Cognisance must be taken of the fact that the sample size was small and therefore the findings are indicative. For BE, no positions identified at level 5.

In Malta, the data show that overall, in the selected media organisations, across all management levels women constitute 16 % of senior staff placed in decision-making positions.

Within the media sector, there are notable disparities between public and private media organisations relating to their commitment to gender equality. Public service companies, in general, can be expected to comply more fully with national codes and legislation in the area of promoting gender equality in decision-making positions than private organisations.

Data on EU-27 level show that women are much more likely to be recruited or promoted to senior positions in public media organisations than in the private sector.

**Figure 3: Percentage of women in decision-making positions and on boards by sector, 2012**

Source: Data were collected in July-September 2012 (See Fig. 2.2, p. 28 and Table 1, p. 91 in the main report).

NB: The risk of double-counting individuals who could have had more than one role within the organisation was avoided by counting the person and not the position. The mixed organisations (public and private) have been included under public. Cognisance must be taken of the fact that the sample size was small and therefore the findings are indicative.

In Malta, similarly with EU-27 average, women are much more likely to be recruited or promoted to strategic positions in public media organisations.

## 2.3. Gender equality in the media regulatory bodies

For the purposes of comparison, the extent to which women participate on the boards of national media regulatory bodies in the EU Member States and Croatia was also considered and Table 2 below shows that of the 213 board member positions across the EU independent media regulators presented, 31 % are occupied by women.

**Table 2: Women and men on the boards of independent media regulatory authorities <sup>(1)</sup>**

EU-27 and HR	Name of Independent Media Regulatory Authority	Percentage of		Total positions
		Women	Men	
MT	Malta Broadcasting Authority	20	80	5
EU-27	Total	31	69	213

Source: Data were collected in July-September 2012 (See Table 2.1, p. 36 in the main report).

## 2.4. Gender equality policies and measures in media organisations

In addition to exploring the positions that women have attained within the management hierarchies of the organisations surveyed, data was also collected on the extent to which those organisations have responded to gender equality outside of binding national legislation. This is done through the establishment of codes and policies, mechanisms for implementing and monitoring gender equality and practical measures that organisations have put in place to support women's career progression.

In 13 Member States, including Malta, media organisations did not have any type of gender equality policy, code of conduct or monitoring mechanism to promote gender equality (a gender equality policy or code of conduct, equal opportunities or diversity policy, a committee responsible for equality policy issues, a Diversity Department, Diversity Officer).



In selected media organisations in 13 Member States, including Malta, none of the practical measures to promote gender equality (a policy on sexual harassment in the workplace, a Dignity at Work policy, a policy relating to maternity leave, a policy relating to paternity leave, a policy relating to parental leave, harassment advisers) were reported.

## 2.5. Gender and the media in national legislative contexts

The national legislation on gender equality existing in Member States and Croatia represents another nuance through which to analyse the gender balance of decision-making in media organisations. It also influences the ways in which media organisations respond to the gender equality agenda by establishing internal policies and codes. In several organisations, the internal policies addressing gender equality follow the requirements of the national legislation; therefore specific policies have not been adopted.

**Table 3: Examples of research, legislation and media-monitoring organisations in Malta**

National government: examples of research, legislation and media-monitoring organisations
<b>a) Research conducted into any aspect of gender and media:</b> no examples provided for MT
<b>b) Legislation on any aspect of gender and media:</b> no examples provided for MT
<b>c) Formal media-monitoring organisations:</b> no examples provided for MT
<b>d) Formal media &amp; gender-monitoring organisations:</b> no examples provided for MT
NGOs, Civil Society, Professional Media Unions and Organisations: examples of monitoring organisations
<b>a) Monitoring organisations which focus on the media:</b> Media monitoring in Malta is the responsibility of the Broadcasting Authority, established in 1961 to monitor and regulate all radio and television broadcasts originating from the Maltese Islands. It is an independent statutory body consisting of a Chairman and four other members appointed by the President of Malta acting in accordance with the advice of the Prime Minister given after consultation with the Leader of the Opposition. <a href="http://www.ba-malta.org/home">http://www.ba-malta.org/home</a>
<b>b) Monitoring organisations which focus on gender and media:</b> no examples provided for MT

Source: Data were collected in July-September 2012

## 2.6. Journalists' professional associations and unions

Important actors in the promotion of gender equality are the various professional associations and unions connected with different aspects of media professional practices. A key association amongst those at the global level is the International Federation of Journalists (IFJ) and its various regional sub-organisations such as the European Federation of Journalists (EFJ). The IFJ/EFJ recently (November 2012) published a handbook on good practice in gender equality amongst European journalists' unions. It includes a number of strategies that could be taken up by a variety of organisations, not just unions or professional associations (?).

**Table 4: Examples of professional media unions in Malta**

<b>a) Professional media unions with a women's officer post:</b> no examples provided for MT
<b>b) Professional media unions with a women's council:</b> no examples provided for MT
<b>c) Organised groups of women media professionals (journalists, filmmakers, etc.):</b> no examples provided for MT

Source: Data were collected in July-September 2012



## 2.7. Strengthening gender equality policies and practices

Although organisations have their own internal policies, and some EU Member States and Croatia have passed their own legislation, there have still been a number of high profile cases where employees have taken their employers to court on the grounds of sex discrimination. There have been several such cases within the media sector and these cases are often very visible in the media because of the high-profile nature of some of the accused organisations. Such cases act as a reminder of the consequences for organisations who ignore the legislation which exists to protect their workforce and especially those members of staff who are women.

**Table 5: Examples of research and high profile cases of media professionals taking their employer to a tribunal on the grounds of gender discrimination in Malta**

a) **Examples of research undertaken or commissioned into any aspect of gender and media:** no examples provided for MT

b) **Examples of high profile cases of media professionals taking their employer to a tribunal on the grounds of gender discrimination:** no examples provided for MT

Source: Data were collected in July-September 2012.

### 3. Indicators to follow up the Beijing Platform for Action: Women and the Media

Proposed indicators are aimed at measuring objective J1 of the BPfA, which is to 'increase the participation and access of women to expression and decision-making in and through the media and new technologies of communication'. The outcomes of the literature review, the collected data and the analysis of collected data served as the basis for the development of the indicators.

Three indicators have been developed and proposed. The first two indicators address decision-making directly, and the data present the numbers of women occupying high-level positions in media organisations, in both internal and external decision-making bodies. The third indicator is of a qualitative nature and it charts the existence of policies and measures in the media organisations promoting and supporting gender equality in decision-making. This indicator does not analyse or evaluate the policies and measures, it shows the number and range of the policies and measures identified within the media organisations.

#### **Indicator 1: The proportion of women and men in decision-making posts in media organisations in the EU**

This indicator measures the extent to which women occupy positions associated with senior decision-making across a range of management and operational functions within media organisations, incorporating both strategic and executive decision-making, so as to include both policy-makers and media content makers.

The indicator encompasses four different decision-making levels, from the highest strategic roles to middle managers as follows:

**Level 1:** The highest decision-making level covering all strategic decisions related to the organisation. The titles that may be covered under this level are: Chief Executive Officer, Chairperson, President, Director or similar positions. The person holding this position is likely to chair the most senior strategic or policy-making board or committee/s of the organisation.

**Level 2:** The chief senior operational managerial position that operates at the top decision-making level and has budgetary control, overseeing programmes and editorial policy under her/his responsibility. The titles that may be covered under this level are: Director General, Executive Director, Editor-in-Chief or similar positions. The person holding this position is likely to chair the most senior operational decision-making committee/s.

**Level 3:** The senior operational management positions that operate as decision-makers and have oversight of specific programmes/media content and execution of budgets. The titles that may be covered under this level are: Heads of Departments, Acting Directors, Management team members or similar positions. These positions are likely to be members of the operational decision-making committee/s.

**Level 4** <sup>(?)</sup>: The managerial positions that entail responsibility for one of the main operational units of the organisation – for example, television, radio, sport, entertainment, news or significant areas of responsibility, e.g. digital services, finance, HR. The titles that may be covered under this level are: Heads of Divisions which are responsible for sub-areas: Head of News, Head of Sport, Head of Culture, Head of HR and Head of a Management Unit, etc.

Different position titles may be contained within the same decision-making level according to the responsibilities performed. Titles are provided only on an indicative basis as they are subject to considerable national variations.



Women occupy only 16 % of the highest level decision-making positions within selected media organisations (both public and private) in the EU. In general, the indicator demonstrates that women's participation in decision-making is higher at the lower levels of decision-making power, but still only reaches an average of 32 % at EU level.

**Table 6: The proportion of women and men at all decision-making levels (levels 1 - 4) in media organisations, 2012**

Country	Type of media organisation	Number of companies	Level 1			Level 2			Level 3			Level 4			TOTAL		
			Percentage		Number of positions	Percentage		Number of positions	Percentage		Number of positions	Percentage		Number of positions	Percentage		Number of positions
			Women	Men		Women	Men		Women	Men		Women	Men		Women	Men	
MT	Public	2	0	100	1	0	100	2	14	86	7	na	na	0	10	90	10
	Private	2	0	100	1	0	100	2	21	79	14	0	100	8	12	88	25
	Total	4	0	100	2	0	100	4	19	81	21	0	100	8	11	89	35
EU-27	Public	42	22	78	41	26	74	27	34	66	325	36	64	864	35	65	1257
	Private	54	12	88	51	18	82	50	30	70	403	32	68	504	29	71	1008
	Total	96	16	84	92	21	79	77	32	68	728	34	66	1368	32	68	2265

Source: Data were collected in July-September 2012 (See Table 3.1 and 3.2, p. 50-51 in the main report)

NB: 'na' indicates 'not applicable'; the mixed organisations (public and private) have been included under public; due to the small number of private media organisations surveyed in each country generalisations should not be made on a country level, however, the data are still indicative on the EU level.

In Malta, in the 4 media organisations analysed, from the 35 positions analysed, only 11 % were occupied by women. In the public media organisations analysed (2), women occupy even less high-level decision-making positions (10 %).

Having only 4 media organisations analysed for one country might not be representative for the entire landscape of existing media organisations. Still, one needs to consider that the 2 public media organisations are the national broadcasters, and the largest media organisations in the country. Also, among the 2 private media organisations, the newspaper has the highest circulation and another is the largest private TV station (audience). These aspects are relevant when considering the representation of the sample.

Taking into account these reservations, data show that women's participation in decision-making positions within selected media organisations in Malta is lower than on average at EU level. Also, women's participation is not higher in public media organisations and quite low in all levels.

## Indicator 2: The proportion of women and men on the boards of media organisations in the EU

This indicator provides information on the proportion of women and men on the boards of media organisations. Boards are generally the strategic decision-taking bodies of the media organisations, and in some also responsible for executive decision-making part of the organisation. The members of the boards form the most senior external oversight committee, either of the organisation or of its parent company, and are in most of the cases unpaid employees of the media organisation. The indicator includes both the chairpersons and the members of the boards.

The indicator shows the share of women in positions in the top strategic decision-making bodies of the media organisation.

The figure includes the members and the chairperson of the decision-making boards of the surveyed media companies. In general, the indicator demonstrates that women's participation in decision-making bodies in media organisations is higher in public media organisations than in private ones. On average, in the media organisations surveyed, the proportion of women in decision-making bodies is 25 %.

**Table 7: The proportion of women and men in the decision-making bodies of public and private media organisations, 2012 (including boards)**

Country	Public and private				Public organisations				Private organisations			
	Number of organisations	Percentage of		Number of positions	Number of organisations	Percentage of		Number of positions	Number of organisations	Percentage of		Number of positions
		Women	Men			Women	Men			Women	Men	
MT	4	38	62	8	2	38	62	8	2	na	na	0
EU-27	96	25	75	924	42	29	71	495	54	21	79	429

Source: Data were collected in July-September 2012 (See Table 3.5, p. 55 in the main report).

NB: 'na' indicates 'not applicable'; the mixed organisations (public and private) have been included under public; due to the small number of private media organisations surveyed in each country, generalisations should not be made on a country level, however, the data are still indicative on the EU level.

In Malta, women occupy 38 % of the positions in decision-making bodies in selected media organisations.

### Indicator 3: Policies to promote gender equality in media organisations

This indicator tracks the extent to which media organisations address the issue of gender equality within their internal policies. It reviews the presence of codes of conduct, mechanisms for implementation and monitoring gender equality, and also practical measures adopted by organisations in order to support women's career development and to improve the gender balance.

It encompasses:

- **Policy measures** including policies on gender equality/codes of conduct; equality opportunities/diversity (to include gender); sexual harassment in the workplace; dignity in the workplace; maternity, paternity and parental leave;
- **Implementation and monitoring mechanisms;** committees on equality policy issues, harassment advisers; Equality/Diversity Department or officers;
- **Practical measures** to foster women's advancement and the portrayal of women in the media including trainee positions specifically for women; leadership/management training for women; equality awareness training for staff.

The indicator shows that almost half (47 %) of the selected media organisations in the EU have at least one policy/code for gender equality. A quarter of media companies have at least one implementation and monitoring mechanism in place. Finally, 9 % of media companies have at least one practical measure in place.

**Table 8: Policies to promote gender equality in the media organisations**

EU-27 and HR	Name of the media organisation	Type: Private/public	Gender Equality Policy/code of conduct	Equality opportunities/Diversity Policy	Policy on sexual harassment in the workplace	Dignity at Work policy	Policy relating to Maternity Leave	Policy relating to Paternity Leave
MT	ONE TV	Private						
MT	Radju Malta	Public						
MT	TVM	Public						
MT	The Times	Private						
<b>Total: MT</b>	<b>4 media organisations</b>	<b>Private: 2 Public: 2</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>
EU-27	96 media organisations	Private: 42 Public: 54	26 %	21 %	23 %	18 %	17 %	16 %

Source: Data were collected in July-September 2012 (See Table 3.6, p. 56 and Table 10, p. 100 in the main report)

NB: Due to the small number of private media organisations surveyed in each country generalisations should not be made on a country level; however the data are still indicative on the EU level.

**Table 9: Measures to promote gender equality in media organisations**

EU-27 and HR	Name of the media organisation	Type: Private/public	Trainee positions specifically for women	Leadership/management training for women	Equality awareness training for staff
MT	ONE TV	Private			
MT	Radju Malta	Public			
MT	TVM	Public			
MT	The Times	Private			
<b>Total: MT</b>	<b>4 media organisations</b>	<b>Private: 2 Public: 2</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>
EU-27	96 media organisations	Private: 42 Public: 54	3 %	6 %	8 %

Source: Data were collected in July-September 2012 (See Table 11, p. 103 and Fig. 2.14, p. 40 in the main report)

NB: Due to the small number of private media organisations surveyed in each country generalisations should not be made on a country level; however the data are still indicative on the EU level.

**Table 10: Bodies (practical measures, mechanisms, codes) to promote gender equality in the media organisations**

EU-27 and HR	Name of the media organisation	Type: Private/public	Committee responsible for equality policy issues	Harassment advisers	Equalities/Diversity Department	Equalities/Diversity Officer
MT	ONE TV	Private				
MT	Radju Malta	Public				
MT	TVM	Public				
MT	The Times	Private				
<b>Total: MT</b>	<b>4 media organisations</b>	<b>Private: 2 Public: 2</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>	<b>0 %</b>
EU-27	96 media organisations	Private: 42 Public: 54	16 %	4 %	9 %	14 %

Source: Data were collected in July-September 2012 (See Table 12, p. 106 and Table 3.6, p. 56 in the main report)

NB: Due to the small number of private media organisations surveyed in each country generalisations should not be made on a country level; however the data are still indicative on the EU level.

Various types of policies (for example, policies on gender equality/codes of conduct; equality opportunities/diversity; sexual harassment in the workplace; dignity in the workplace; maternity, paternity and parental leave), practical measures (including trainee positions specifically for women; leadership/management training for women; equality awareness training for staff) or implementation and monitoring mechanisms (committees on equality policy issues, harassment advisers; Equality/Diversity Department or officers) to promote gender equality have been implemented in media organisations in Member States. Malta is one of the nine Member States where none of the media organisations reported having at least one above mentioned policy, practical measure or implementation and monitoring mechanisms.

# Conclusions

The report marks the first effort in the framework of the implementation of the Beijing Platform for Action (BPfA) to propose indicators – measuring the progress of gender equality in media organisations in the EU. It explores the extent to which women occupy decision-making positions across a range of major media organisations in the 27 Member States and Croatia and identifies the extent to which those same organisations have developed gender equality policies, the mechanisms that are put in place to monitor such policies and the kinds of specific initiatives taken to further support women's career development. The existing consensus at the EU level on the need to promote gender equality in the media could be strengthened by regular monitoring and use of the proposed indicators.

EIGE's report reveals that much of the media sector in the EU Member States and Croatia has, on average, women as nearly half the workforce and account for more than half of tertiary level graduates for media-related careers. Despite of this positive trend, the media continues to be male-dominated in most of the EU Member States and Croatia. Looking at the recent employment and educational attainment trends in Malta, 25 % of tertiary level graduates for media-related careers are women, but data are not available about employment within media industry.

Three indicators have been proposed for measuring objective J.1 of the Beijing Platform for Action on increasing the participation and access of women to expression and decision-making in and through the media, as well as new technologies of communication. Two of these indicators analyse the representation of women in decision-making positions in media organisations and on the decision-making boards of media organisations. The third indicator assesses the existence of policies specifically developed in media organisations for the promotion of gender equality.

The first indicator shows that in Malta, women occupy only 11 % of the decision-making-posts in the media organisations and this is lower compared to EU-27 average. The women's participation in the decision-making posts is also not higher in the public media organisations.

The second indicator provides information on the proportion of women and men on the boards of media organisations. In Malta, women occupy 38 % of the positions in decision-making bodies in selected media organisations.

And finally, the third indicator, about existence of policies shows that Malta is one of the nine Member States where none of the media organisations reported having at least one policy, practical measure or implementation and monitoring mechanisms.

## Recommendations:

- Organisational cultures and structures that prevent women's advancement in decision-making positions should be tackled by internal policies and practical measures in the media sector.
- National policy-makers should be more encouraging in fostering change from a passive commitment towards a more pro-active approach to gender equality in media organisations.
- Good practices should be shared as they are an important prerequisite for change.
- Professional media organisations and associations should act as role models by striving for gender equality in their own internal structures.



# Endnotes

- 1 There may be other regulatory authorities that monitor media in the EU Member States and Croatia, but we do not have data on those bodies, so these data are indicative rather than comprehensive: some Member States have more than one regulator.
- 2 EFJ/IFJ, *A Handbook on Gender Equality Good Practices in European Journalists' Unions*, Brussels, I/EFJ, 2012.
- 3 In Chapter 2, the decision-making structures of the media companies were analysed at 5 levels. The analysis of the collected data along these levels showed big similarities between level 4 and 5. Based on this, Indicator 1 should be structured only at 4 levels of decision-making.



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