

Sida-funded International Training Programme  
“Media Development in a Democratic Framework”

# ITP Media – Georgia

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FINAL REPORT – 2023/2024

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# Table of Contents

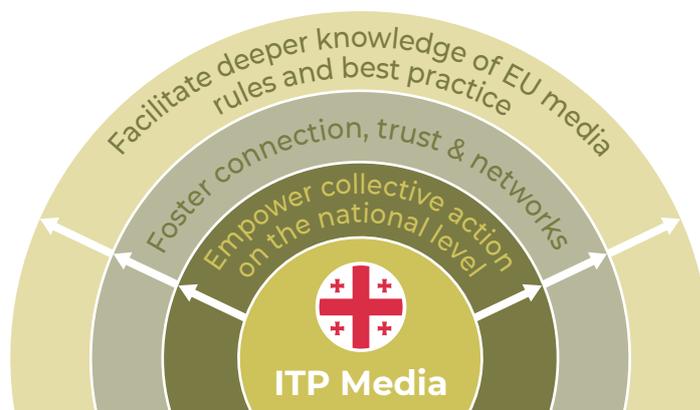
<b>1. INTRODUCTION</b>	<b>4</b>
<b>2. METHODOLOGY</b>	<b>6</b>
<b>3. CONTEXTUAL ANALYSIS -CURRENT MEDIA TRENDS IN GEORGIA</b>	<b>8</b>
<b>4. MAIN ACTIVITIES THROUGHOUT THE PROGRAMME</b>	<b>14</b>
<b>5. KEY ACHIEVEMENTS AND CHANGES THANKS TO THE PROGRAMME</b>	<b>22</b>
5.1 Programme outcomes (both intended and unexpected results will be reported upon)	23
5.2 Participants' key learnings (output level)	27
5.3 Summary of the change initiatives (what has been done so far)	31
5.4 Testimonies from participants on learnings, results and spin offs	37
<b>6. CONCLUSIONS, LESSONS AND SUGGESTIONS</b>	<b>38</b>
6.1 Conclusions and lessons learnt - programme management's reflections	39
6.2 Suggestions how to build further on the ITP both for participants themselves and for the Swedish Embassy in Georgia	40
<b>ANNEX 1: Results framework</b>	<b>42</b>
<b>ANNEX 2: List of participating organisations</b>	<b>45</b>
<b>ANNEX 3: Phase 2, Study visit to Sweden</b>	<b>47</b>
<b>ANNEX 4: Phase 4, Study visit to Brussels</b>	<b>51</b>
<b>ANNEX 5: Survey questions</b>	<b>55</b>
<b>ANNEX 6: Survey results after study trip in Sweden (November 2023)</b>	<b>60</b>
<b>ANNEX 7: Survey results after study trip in Brussels (April 2024)</b>	<b>61</b>

# 1 INTRODUCTION

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This final report is a summary of the activities and achievements in the International Training Programme Media (ITP Media) for 20 participants from Georgia. The programme was called off by the Swedish Embassy in Georgia within the framework contract “Capacity Development Programme ITP 295: Self-Regulating Framework for Democratic Media Development” between Sida and NIRAS Sweden AB, in consortium with International Media Support (IMS), Linnéuniversitetet (FOJO Media Inst), and Global Reporting Sweden AB<sup>1</sup>. The primary focus of this programme was to promote and strengthen free, reliable, independent, and inclusive professional journalism, as well as to support media reform features relevant to Georgia’s alignment with European Union (EU) standards. The underlying assumption is that independent and trustworthy media, along with an open public debate, are crucial pillars of democracy, serving as safeguards against disinformation and propaganda from various sources. In that sense, the programme recognises the significance of countering actions that undermine democratic principles, and infringe upon fundamental human rights, as part of the broader agenda of the EU and Swedish (geopolitical) priorities, the recently adopted reform agenda and the reform cooperation strategy 2021-2027.<sup>2</sup>



The programme has been designed as a *fellowship initiative*, offering an opportunity for influential individuals and organisations from the relevant fields to acquire specialised knowledge and skills to gain comprehension of the principles and procedures involved in driving complex change projects. The programme empowers participants to collectively advance the agenda for enhanced self-regulation. Change initiatives have evolved through participant interactions and insights gained from study visits and webinars. Since Georgia previously only had 6 participants from the previous cohort, the additional 20 participants now brings the network size in line with other regions where ITP has operated. Two of the organisations, the Communication Commission and The Georgian Charter of Journalistic Ethics, also had participants in the first cohort.

The purpose of this final report is to share the results and achievements thanks to the programme as well as a brief analysis of lessons learnt<sup>1</sup>, conclusions and suggestions for the Swedish Embassy and the participants. The report includes: a) a brief contextual analysis highlighting the current challenges under which the media operates, b) a description of the main activities carried out in the programme, c) key results and changes identified thanks to the programme, and d) conclusions, lessons learned, and recommendations for the Swedish Embassy on how to further support and promote the network that has been built up thanks to the programme.

<sup>1</sup> The roles and responsibilities between partners are further detailed in the Inception report and the also in the staff manual, which have been prepared by the consortia. In general, NIRAS, as the lead partner, holds the project management responsibility for the implementation process, including contractual issues and the follow-up of results and learning as well as dialogue with the client. Meanwhile, the partners IMS and Fojo Media Institute are primarily responsible for ensuring that the core content of the programme is up-to-date and relevant for the target group, as well as maintaining dialogue with international media experts.

<sup>2</sup> <https://www.government.se/reports/2024/02/development-assistance-for-a-new-era-freedom-empowerment-and-sustainable-growth/> and <https://www.regeringen.se/contentassets/bd9ca35b1bb548a999bc67aab348acb5/strategi-for-sveriges-reformsamarbete-med-osteuropa-20212027.pdf>

# 2 METHODOLOGY

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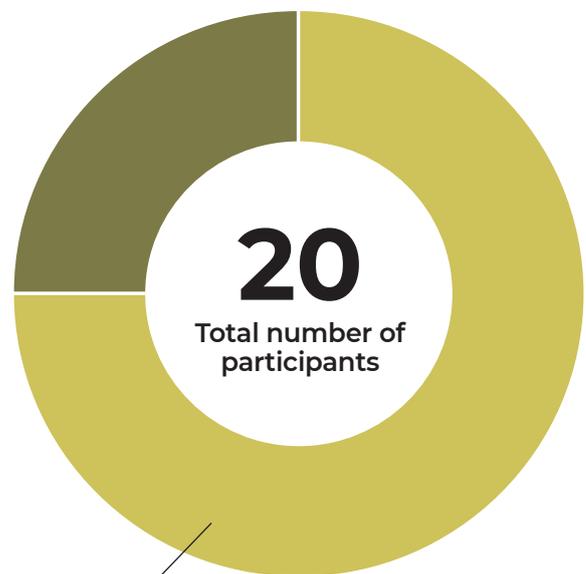


The reporting of results and lessons learned have described and analysed results on the levels as outlined in the programme objectives (see results framework in Annex 1). As described in the Inception Report, we have mainly followed up on outputs and outcomes but also, in parallel, made use of outcome harvesting to capture complexity of unintended results. Based on previous experience, some outcomes/changes in this type of programme may take several years to materialise. In other ITPs, change projects evolve over 4-5 years. In this programme, we only had 1+1 year, making us more vulnerable to contextual changes. The assessment of the outcomes primarily took place towards the end of the programme and has understandably been highly depended on the types of processes and contextual / political context that unfolded in Georgia during the year of project implementation. The participants in this programme consisted of change makers representing a broad palette of key organisations influencing the regulatory and self-regulatory framework in Georgia (see Annex 2 for more information). Although we strived for a better gender balance, we ended up with 4 men and 16 female participants. According to the participants, a clear majority of active people in mid-level positions in the media sector are female.

At the output level, the assessment is based on our (as organisers) continuous professional reflections as well as progress reports by national facilitators, self-assessment, surveys, and discussions with the participants. Stories of change have been utilised to capture the participants’ learnings (outputs) and the changes they have implemented within their respective organisations. These are collected under our YouTube channel that can be accessed at: <https://youtu.be/P2Whog4B3ag>.



A final survey was used to collect reflections from the participants. A total of 15 participants (out of 20) completed the final survey (11 female, 4 male). Three of the respondents were from a state agency, 5 from the media sector, 6 from CSOs and 1 is a media influencer/citizen.



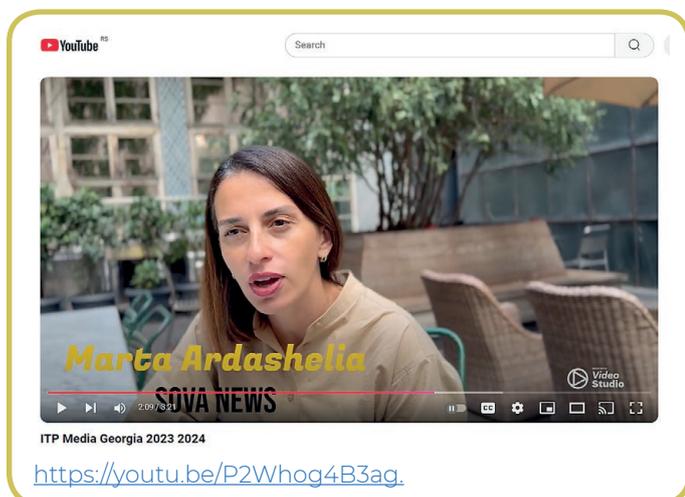
**15** Participants completed the final survey

**3** from state agency

**5** from media sector

**6** from CSOs

**1** Media influencer/citizen



# 3

## CONTEXTUAL ANALYSIS - CURRENT MEDIA TRENDS IN GEORGIA

**Figure 1:**  
EU and Georgian flags,  
Tbilisi 2024  
Photo: Ezz Gaber



In the post-Soviet area, Georgia continues to navigate its path toward democratisation and European integration, contending with significant challenges from Russia as well as anti-democratic forces within its own borders. These struggles have been exacerbated by the ongoing Russian war in Ukraine as well as Russian occupation of Georgia’s regions of Abkhazia and South Ossetia. Amidst this complex landscape of regional instability, political and economic uncertainty, civil society and the media are finding innovative ways to remain engaged and uphold democratic values.

### Legal framework for media freedom and free speech

The Constitution of Georgia and related laws on free speech and media freedom largely align with internationally accepted standards. Article 17 of the Constitution promotes a diverse and pluralistic media environment by safeguarding journalists’ independence and enabling media outlets to operate without undue influence or censorship. Additionally, the Constitution implicitly guarantees the right of individuals to access the internet without unjust interference from state or non-state actors. Following amendments introduced in 2017, access to the internet was explicitly established as a constitutional right in Georgia. As a result, the country maintains a status of free internet, with no evidence of government-imposed blocking or filtering of online content.

The Law on Freedom of Speech and Expression provides a comprehensive framework for protecting fundamental rights related to expression, including provisions on defamation, privacy, and professional secrecy. It upholds journalistic integrity by offering absolute privilege for protecting confidential sources. Similarly, the Law on Broadcasting sets guidelines for media service providers and video-sharing platforms, defining obligations, licensing requirements, and regulatory oversight by the Communications Commission. The aim is to foster a competitive and transparent media environment while ensuring media pluralism and consumer protection. The General Administrative Code of Georgia regulates access to public information.

### Recent legal changes impacting media and freedom of assembly

In recent years, several controversial legal changes have been introduced, directly impacting Georgia’s media landscape. These include amendments to the Law on

Broadcasting, the Law on Meetings and Demonstrations, and the proposed Law on Transparency of Foreign Influence.

In October 2023, amendments to the Law on Meetings and Demonstrations were enacted, explicitly prohibiting the assembly of “temporary structures,” such as tents and stages, during public demonstrations. Reputable non-governmental organisations (NGOs), including Transparency International Georgia and the International Society for Fair Elections and Democracy (ISFED), have criticised these changes, warning that they represent a significant regression in human rights protections.



**Figure 2: Pro-European March in Tbilisi, October 2024**  
**Photo: Ezz Gaber**

In September 2022 and October 2023, the Georgian Parliament adopted amendments to the Law on Broadcasting, which expanded the powers of the Communications Commission. These changes allow the Commission increased authority to monitor content, marking a shift from self-regulation to more direct regulation of hate speech. Previously, media outlets were responsible for addressing hate speech or incitement to terrorism through their own self-regulatory bodies. However, the amendments enable decisions of these

self-regulatory bodies to be challenged before the National Communications Commission, which now has the authority to impose substantial financial penalties. Human rights advocates have raised concerns that these amendments could restrict freedom of speech, providing the Government with tools to penalise critical media. Although the Government has stated that these changes aim to align the law with the EU's Audio-visual Media Services Directive (AVMSD), a legal opinion issued by the Council of Europe indicated that the amended Law on Broadcasting does not fully conform to the AVMSD.

### The Law on Transparency of Foreign Influence ("Foreign Agents" Law)

Another significant development affecting the media landscape was the introduction of the Law on Transparency of Foreign Influence, often referred to as the "Foreign Agents" or "Russian Law". The bill was initially withdrawn from Parliament in March 2023 following widespread protests but was reintroduced in April 2024 and adopted in May 2024, despite ongoing mass protests. Modelled after Russia's restrictive "foreign agent" legislation, the law imposes stringent requirements on NGOs and media outlets receiving foreign funding, effectively stigmatising them and threatening their financial sustainability. The passage of this law has raised serious concerns both domestically and internationally, as it is seen as undermining media freedom, journalistic independence, and the broader democratic health of the country.

These legal reforms have drawn strong condemnation from Georgia's international partners. In particular, the adoption of the "foreign agents" law has led to the suspension of Georgia's EU membership process and significant reductions in foreign aid, raising questions about the country's commitment to democratic values. The law is a culmination of gradual shrinking of civic space, which started ten years earlier and has been characterised by increased challenges for civil society in Georgia including a lack of access to public information, illegal surveillance, non-inclusion in policy decisions and defamation. The parliamentary elections in October 2024 will be a crucial indicator of how these legal changes and the political climate will shape Georgia's future direction.

As Georgia continues its efforts to solidify democratic governance and pursue European integration, recent legal changes highlight the tension between government control and democratic freedoms. While the

constitutional framework ostensibly supports media freedom and freedom of expression, the legal amendments introduced over the past two years have raised serious concerns about the erosion of these rights. The long-term effects of these changes will be determined by both domestic and international responses, and the outcome of the forthcoming elections will likely play a pivotal role in shaping Georgia's democratic trajectory.



**Figure 3: Pro-European March, Tbilisi October 2024**  
Photo: Ezz Gaber

### Media environment in Georgia

While there are no formal legal or institutional barriers to entering the media market or practicing journalism in Georgia, informal norms and editorial practices can undermine press freedom. Media experts have observed that journalists working in politically affiliated outlets often engage in self-censorship, which limits the diversity of viewpoints in the media landscape.

There have been numerous recent incidents involving threats, physical attacks, and blackmail against journalists in Georgia, with investigations often being inadequate. Independent media outlets have faced significant challenges, including the blocking of web addresses and the spread of fake news under their names, raising concerns about external propaganda efforts.

Political challenges persist, with notable arrests of opposition media figures drawing criticism for potential political motivations. While international pressure has led to some releases, the safety of journalists still needs improvement. Incidents of violence against journalists have raised concerns about accountability and justice, with some offenders receiving light penalties and others avoiding legal repercussions entirely. A significant obstacle to media sustainability in Georgia is the small and declining advertising market, affected by factors such as underdeveloped small and medium-sized enterprises (SMEs), currency fluctuations, tax legislation, and shifts in technology. Advertising revenue is a critical source of income for many TV stations. However, the limited market size is insufficient to sustain a diverse range of outlets. As a result, many media organisations rely on support from private owners, who often use these platforms as tools for political influence rather than genuine business investments.



**Figure 4: Tbilisi view, Autumn 2024**  
Photo: Ezz Gaber

Georgia has a vibrant yet fragile independent online media sector that offers alternative narratives in a highly partisan environment. These outlets, though limited in audience reach compared to television and social media, mainly rely on donor funding to operate. Social media advertising has seen growth, particularly on platforms like Facebook, which allows media outlets to target specific groups. However, the small size of the Georgian-speaking audience on these platforms limits the revenue potential.

Unlike many post-Soviet states, Georgia does not have state-owned media. The Georgian Public Broadcaster (GPB) is publicly funded but operates independently of direct state control and is governed by a board selected by the Parliament. However, the overall media environment remains highly polarised, with significant TV stations owned by businessmen affiliated with either the Government or opposition. Support for media projects comes from various sources, including EU programmes, individual European countries, USAID, and several NGOs. Civil society organisations (CSOs) like the Media Advocacy Coalition (MAC), the Institute for Development of Freedom of Information (IDFI), and Transparency International Georgia actively advocate for media reforms and freedom.

### Media regulation

Concerns about the independence of the Georgian National Communications Commission (ComCom) have been on the rise. Though officially an independent regulatory body, ComCom has faced accusations of engaging in discriminatory licensing practices, unexplained delays, and blocking allocations for radio and TV spectrum licenses. In contrast, the Georgian Charter of Journalistic Ethics (GCJE), founded in 2009, serves as an independent self-regulatory body. The GCJE works to raise professional and ethical standards and provides mechanisms for self-regulation. While it receives complaints and issues rulings on journalistic standards, its decisions are non-binding, and adherence is voluntary for media organisations and journalists.

Georgia finds itself at a crossroads between a pro-Western public sentiment and political elites perceived as Kremlin-friendly. Although most of the population views Russia as a threat, pro-Kremlin narratives persist, promoting traditionalism, scepticism of Western integration, and various conspiracy theories. According to the Centre for Strategic and International Studies, Russia employs hybrid tactics with three primary goals: (1) discrediting the West and reversing Georgia's

European and Euro-Atlantic ambitions, (2) weakening Georgia internally by supporting radical nationalist and pro-Kremlin groups, and (3) portraying Georgia as a problematic state with limited value to the West.



**Figure 5: Demonstration in Tbilisi against results of the Parliamentary elections, October 2024**  
Photo: Ezz Gaber

## Political tensions and European integration

In September-October 2023, Georgia's ruling party initiated an unsuccessful impeachment attempt against President Salome Zurbishvili, following uncoordinated visits to Europe and meetings with leaders from the European Council, Germany, and France. As a parliamentary republic, the President's powers are largely symbolic, yet the opposition and President Zurbishvili have accused the ruling party of stalling European integration and failing to fulfil the 12 conditions set by the European Commission for obtaining EU candidate status.

Amidst ongoing impeachment efforts and the tightening of laws affecting freedom of speech, the pre-election period leading up to the October 2024 parliamentary

elections saw heightened political polarisation. Public support for European integration remains robust, with various polls showing nearly 80% of Georgians favouring closer ties with the EU. Journalists continue to play a crucial role in advocating for these aspirations, providing hope that despite the tense political climate, the process of European integration will progress.

The media environment in Georgia is marked by vibrant but fragile independent outlets, partisan ownership, and challenges in regulatory independence. While the legal framework nominally supports free expression, incidents of violence against journalists, political pressure, and recent legislative actions have raised concerns about press freedom. As Georgia approaches a crucial election, the tension between the public's pro-European aspirations and the actions of political elites will shape the country's democratic trajectory. Media and civil society's continued resilience in advocating for free expression and transparency remains critical to Georgia's progress toward its European integration goals.

Despite significant pro-democratic support and progress since the early 2000s, Georgia has experienced a decline in democracy, human rights and freedom of expression in recent years. Georgia is often described as a "hybrid regime" or a competitive authoritarian state, meaning it shifted from an authoritarian system by introducing elections but did not fully transition to a democratic model. Instead, it remains a mix of competitive elections with certain authoritarian elements. The situation in Georgia is worsened by a broader global crisis in democratic governance, where democracy is declining worldwide, with the average person's experience of democracy regressing to levels seen in 1985, and most people now living in non-democratic nations. While nearly all aspects of democracy are deteriorating globally, freedom of expression has been among the hardest hit. Nevertheless, the most recent survey shows increasing support of the Georgian population to democracy ([Democracy is preferable to any other kind of government" – 67%](#)), EU ([Trust towards EU – 58%](#)) as well as Georgia's membership in EU ([Support Georgia's membership in EU – 71%](#)).



# 4

## MAIN ACTIVITIES THROUGHOUT THE PROGRAMME

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In this section, we briefly describe the main activities that have been implemented. As with all programmes under this framework agreement, this followed five phases during implementation:

## Phases



**Phase 0: Preparatory phase**  
**Selection of participants and preparation**  
 (June – September 2023)



**Phase 1: Start up meeting, team building and introductory webinars**



**Phase 2: Study trip to Sweden, division into change initiative teams**  
 (November – December 2023)



**Phase 3: Webinars, work on change initiatives**  
 (January – March 2024)



**Phase 4: Study trip to Brussels, work on change initiatives**  
 (April 2024)



**Phase 5: Implementation of change initiatives**  
 (May – August 2024)

tives from NGOs who are actively engaged in advocacy for legislative reforms that enhance press freedom and protect the rights of journalists (e.g. Georgian Democracy Initiative providing strategic litigation support for media personnel in courts), fact-checking programmes as well as members from both central and regional media outlets, such as Radio Marneuli working with a focus on ethnic minority communities. The participants were nominated as representatives of their respective organisations, and it is therefore expected that their learning will be brought back to their organisations, which has been communicated by ITP Georgia programme team throughout the entire project. Even though the focus of this programme is more on collaboration between different types of stakeholders, changes within organisations often becomes important added value of the programme and was one of the outcomes of the programme (see section 5.1. and outcome 2 for more details). A full list of organisations is included in Annex 2.



**Figure 6: Regional Team-building meeting in Mtskheta, Georgia 2023**

### Phase 0 (June – August 2023)



ITP participants were selected according through a process that included pre-selection based on the criteria in the call for applications. Pre-selection meetings were held with relevant potential individuals and organisations in Georgia as well as in-person meeting in Copenhagen between representatives from NIRAS, IMS, and the National Advisor for the ITP Georgia programme.

As a result, 20 participants were selected from diverse sectors including the state agency responsible for media regulation, the ComCom, as well as representa-

### Phase 1 (September-November 2023)



A startup meeting was conducted in Tbilisi on September 12 with 19 ITP Media participants, 3 graduates from a previous cohort as well as project managers and representatives from the Swedish Embassy and the European Council in Georgia. The goal of the meeting was to present the ITP Media objectives. Thematic mentors from a previous programme, ITP Media Eastern Europe, shared their global experiences and shed light on the challenges and issues within the realm of self-regulation and media regulation. Moreover, the graduates of the previous programme offered insights into

their personal experiences and the outcomes of their participation. Finally, the participants conducted a political, economic, sociological, technological, legal and environmental (PESTLE) analysis of the media sector in Georgia, delving into the various pertinent aspects of the country’s media landscape.

During October, the programme facilitated four thematic webinars for the group, taking place on October 5, 12, 19, and 27, each focusing on crucial aspects of media regulation and self-regulation and related topics. These included discussions on:

- the self-regulatory framework and institutions in Eastern Europe, led by expert Roman Kifluk;
- an exploration of international and regional standards with an emphasis on freedom of expression, human rights, and democracy, led by expert Antonina Cherevko;
- an analysis of media politics in a rapidly evolving media landscape, led by expert Oleg Khomenok; and
- an in-depth examination of the Swedish media system and its key institutions, led by expert Ola Sigvardsson.

On October 27, the national facilitators arranged a *face-to-face group meeting* in Mtskheta, a city near Tbilisi. Apart from actively participating in the webinar, the team dedicated time to reviewing the PESTLE analysis and engaged in a comprehensive stakeholder analysis. The meeting lasted the whole day and was a great opportunity for team building and discussing the practical aspects of their upcoming study visit to Sweden.

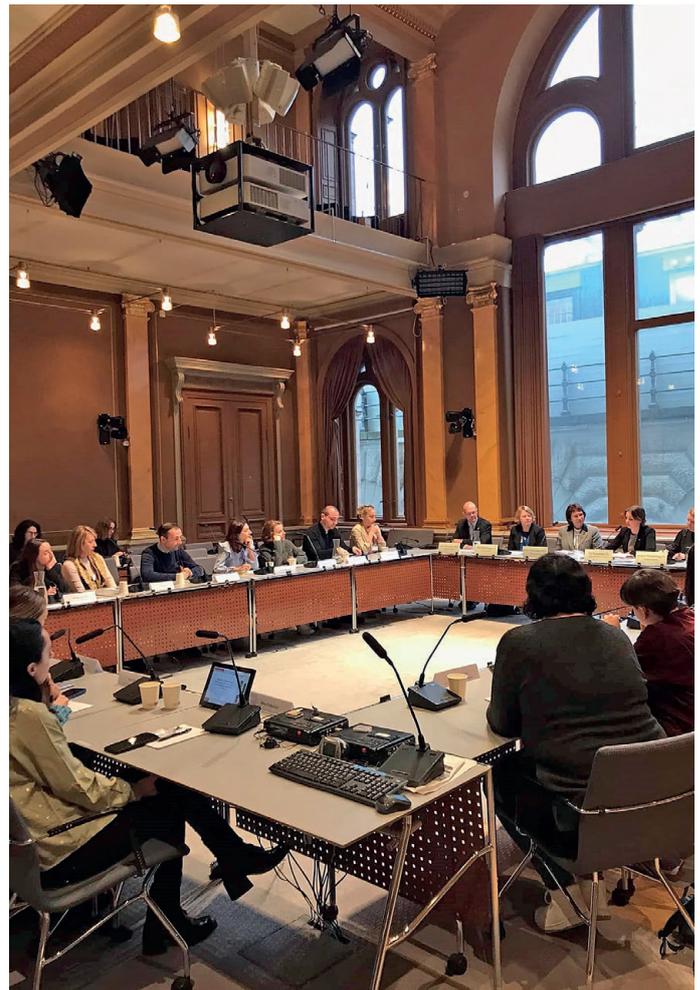
## Phase 2 (November 2023) Visit to Sweden



From November 5-15, the participants had a 10-day study visit seminar/workshop in Sweden, focusing on getting inspiration from Swedish experts and organisations, as well as starting to develop the change initiatives. Another important objective with the visit to Sweden was that the participants promote the network and trust among the group.

During the study visit, the participants had opportunity to participate in workshops on the following topics: Swedish media landscape - regulatory and self-regulatory systems; freedom of media and freedom of expression in Sweden including challenges ahead (histor-

ical, legal and practical/journalistic; gender, regulation and self-regulation; how to make change happen; and team building and project design. The seminar/workshop was planned with several visits to relevant stakeholders in Sweden showcasing various aspects of media regulation and self-regulation. Visits were made to the Swedish Parliament (on constitutional aspects of media’s role in society); Swedish Radio (its public service mandate and role and how it is affected by EU regulations); the Schibsted Group Headquarters / Aftonbladet (adaptation to EU regulations and self-regulation in practice); the Swedish Media Publishers’ Association (Tidningsutgivarna) [to discuss e.g. the EU Digital Services Act (DSA), Digital Markets Act (DMA) impact on industry]; the Swedish Press and Broadcasting Authority (on regulatory aspects and how to implement EU directives) and NIRAS’ Stockholm office (see Annex 3 for more information of the programme in Sweden).



**Figure 7: Georgian participants attending a meeting with members of the Constitutional Committee in the Swedish Parliament, November 2023**

After spending a week in Stockholm, participants transitioned to Uppsala, where they concentrated on developing change projects. This phase involved outlining the design of each initiative, including establishing timelines, identifying necessary resources, and determining the organisations and tasks required for successful implementation. Participants organised themselves into four groups, each tasked with formulating a concept for a change initiative. The focus was made on strategic selection of groups based on where we believed their contributions would be most valuable. Notably, representatives from the ComCom participated in three of the four groups, which enriched the discussions and brought diverse perspectives to the table. This dynamic collaboration likely improved the quality of the proposals, fostering a more comprehensive approach to the challenges at hand and facilitating knowledge exchange, all contributing to the overarching goal of breaking down silos.

The four change initiatives were:

- **Change Initiative #1: Entertaining with Media Literacy** – Creating a media literacy model for Georgian kindergartens (participants: Georgian Public Broadcaster, Georgian Media Group, ComCom, NGO Open Borders/Jnews and TOK TV). The goal was to create audio-visual content/cartoons for increasing media literacy in kindergartens of Georgia.



*Figure 11: Workshop in Stockholm, November 2023*

- **Change Initiative #2: Press Freedom Guard** – Developing a legal toolkit for journalists in Georgia (participants: Georgian Democracy Initiative (GDI), Media Development Foundation, Sova News, Project 64/Mediachecker and Journalism Resource Center). The goal was to create a concise guideline that will explain the essence of relevant legislation to broadcast media representatives.
- **Change Initiative #3: Establishing an appeal mechanism out of regulatory institutions, improving the existing system and promoting the creation of self-regulation where there is none** (participants: Media Development Foundation, Community Radio Marneuli, On.ge, ComCom and NEO TV). The goal was to upgrade self-regulatory mechanisms of at least three media organisations.
- **Change Initiative #4: Enhance internal self-regulatory mechanisms** (participants: The Georgian Charter of Journalistic Ethics, iFact, Chai Khana, ComCom and The Georgian Charter of Journalistic Ethics). The goal was to create and support self-regulatory mechanisms for online media outlets who do not have internal self-regulation or are not obligated by law to do so.



*Figure 9: The Georgian group visiting Swedish Radio, November 2023*



*Figure 10: Visit “Schibsted” publishing house in Stockholm, November 2023*

The majority of the participants believed that the study trip met or in some cases even exceeded their expectations. According to the participants, the study trip (1) increased their knowledge and capacity in terms of understanding the new EU regulatory directives and how they could be implemented in a Georgian context, (2) increased their understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy, (3) improved national networks, (4) increased awareness of the various parts of the self-regulatory framework and (5) increased their knowledge and capacity to initiate a structured, long-term transformation work within and outside the respective organisations. Overall the majority of the sessions were found to be relevant or highly relevant for the participants, especially the ones on Swedish media landscape and Swedish values as well as freedom of media and freedom of expression. The participants especially highlighted study visits to Swedish Public Service (Swedish Radio), the Swedish Media Publisher Association (TU), Schibsted and Aftonbladet and the Committee on Constitution at Swedish Parliament (see more details in Annex 6).

Following the study visit to Stockholm, where participants gained inspiration and established networks with local actors from organisations, agencies, and independent companies essential to the media environment and its operability—ensuring press freedom and freedom of speech—the ITP Media participants convened for a group meeting on December 12 in Tbilisi. During this meeting, they discussed specific plans for implementing their projects, focusing on challenges, opportunities, and responsibilities. This follow-up meeting was crucial in keeping project implementation on track, fostering a culture of continuity and progress, and promoting regular collaboration.

### Phase 3 (December 2023 – March 2024)



During this phase, participants continued to refine and adjust their change initiatives, testing their ideas with stakeholders and decision-makers. They engaged in regular meetings with experts both local and foreign, colleagues from other media organisations, NGOs,



Figure 12: The Georgian group in front of the Swedish Parliament, Stockholm 2023

municipal governments, and community representatives. These interactions aimed to present their ideas and foster collaboration among diverse stakeholders paving the way for implementation of the change projects. By actively seeking feedback and building partnerships, participants enhanced the viability of their initiatives, ensuring that they addressed the real needs of the communities they serve. This collaborative approach not only strengthened their projects but also deepened their understanding of specific issues within Georgia’s media landscape. It helped raise awareness of the often-overlooked self-regulatory practices in the media, enabling more effective implementation of their initiatives.

On February 23, 2024, ITP participants held a meeting at the Swedish Embassy with Eva Atterlöv Frisell, Counsellor and Deputy Head of Development Cooperation, and Erik Illes, Head of Development Cooperation and Deputy Head of Mission. This meeting was organised at the participants’ request to enhance communication with the Swedish Embassy, the programme’s donor and a supporter of various initiatives in Georgia aimed to foster and advance development and strengthening of democratic institutions that align with overall EU agenda. The participants aimed to present their projects, outlining their status, needs, and the challenges they face. Representatives from four groups shared their project implementation plans and progress.

Additionally, the meeting served as a platform for exchanging opinions, allowing participants to update the Embassy on key national issues, including the complexities of collaborating with various government agencies. They discussed the implications of these challenges in light of the upcoming elections and other politically

significant events, striving to convey a comprehensive picture of the persistent issues in Georgia’s media landscape.

Over February and March, ITP participants had three webinars on the topic of media capture (experts Andrei Richter, Mamuka Andguladze and Marius Dragomir), as well as de-oligarchising (Grainne McMorrough from the Venice Commission).

## Phase 4 (April 2024) Visit to Brussels



During April 7-14, the participants went on a study visit to Brussels, Belgium, with the aim of increasing the understanding of EU requirements from key informants/experts located in Brussels. Another purpose of the visit was to further build the network and get new inputs for the change initiative. During the study visit, the participants presented their change initiatives and received feedback from experts invited by NIRAS.



**Figure 13: Meeting with representatives of DG Connect, European Commission in Brussels, April 2024**

During the visit, the participants had a number of meetings with the European media regulatory authorities in Brussels, including the Secretary General of the Conseil de Déontologie Journalistique (CDJ); the Conseil Supérieur de l’Audiovisuel (CSA) for Audiovisual Media Services (ERGA); the Center for Democracy and Technology (CDT); representatives of the European Commission (DG Connect); META and Google (on their DSA compliance efforts); and Stratcom (European External Action Service) about the EUvsDiSiNFO project.



The visit included a number of workshops and discussions, such as the European experience in European Digital Observatory (EDMO) hubs and case study of EDMO hub BELUX; EU legislation (AVMSD, EMFA, DSA, AI Act), as well as lobbying and EU integration. See Annex 4 for more information on the Brussels’ programme. On April 29, the ITP Media participants held an additional meeting in Tbilisi facilitated by Jean-François Furnémont, an independent consultant specialising in public affairs, policy, regulation and strategy, in order to further reflect on the lessons learned during the study trip to Brussels.

Participants highly appreciate the study trip and said it met their expectations. Similar to the study trip to Sweden, the participants positively assessed their increased knowledge in various fields including the new EU regulation directives and how they could be implemented in a Georgian context, understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy, improved national networks, awareness of the various parts of the self-regulatory framework as well as knowledge and capacity to initiate a structured, long term transformation work within and outside the respective organisations. The participants reported significant knowledge gains in areas like building trust among institutions, the EU law-making process, combating disinformation, addressing violent language, media regulation/self-regulation, hate speech legislation, and key EU directives (AVMSD, EMFA, DSA) as well as CSO advocacy with EU institutions and the operations of Meta and Google under DSA and GDPR (see more details in Annex 7).



**Figure 15: Workshop at European Regulations Group for Audiovisual Media Services (ERGA) in Brussels, April 2024**



**Figure 17: Meeting at Google Office in Brussels, April 2024**



**Figure 14: At Meta Office in Brussels, April 2024**

## Phase 5 (May – August 2024)



During phase 5, participants tested and re-evaluated some of their ideas. Most change projects required review and adjustment due to the shifting political landscape and escalating tensions between civil society and the Government, particularly following the adoption of the so-called “Foreign Agents” law. This law has created significant uncertainty for many NGOs and media professionals, who are grappling with existential challenges, including financial sustainability, potential fines for non-compliance with registration as foreign agents, increased censorship, negative portrayals of the media, acts of hostility toward offices and organisations, and psychological harassment etc. In order to assist

the participants navigating this uncertainty and better plan strategic communications around their change initiatives, ITP Media has provided expert assessment of the situation with practical tips for the participants on how to better promote their change projects.

The tightened environment for media has, of course, also impacted this programme. The introduction of the Russian-style law has hampered the implementation of change initiatives, as participants have struggled to dedicate their time and resources to the programme leading to timelines being extended significantly. Consequently, programme management needed to reassess its intervention strategy.

Through ongoing communication with the Swedish Embassy, which has been actively engaged and seeking regular updates, the focus has shifted based on participants' requests. The Embassy agreed to prioritise specific activities within the four change projects to advance their implementation, moving away from predominantly learning sessions and workshops. At the participants' initiative, the project's outline and activities were rethought and rescheduled to better support their change initiatives. Participants specifically expressed the need to redirect focus toward activities that directly advance their projects, seeking funding for critical tasks essential to the success of their initiatives.

The Embassy recognised this adjustment as timely and relevant, leading the programme to concentrate

on planning and organising targeted activities including broader workshops that would include specific stakeholders, conferences, production of communication materials, and awareness campaigns that would advance the change initiatives. This shift included disseminating information about the change projects being launched and those already underway with the aim to partly promote the change projects, ITP Media and self-regulatory frameworks, and partly engage more actors, stakeholders and other enablers of the change into the process. By doing so, the programme has been able to maintain its momentum and ensure progress, effectively redirecting efforts and resources toward areas where meaningful change remains achievable despite the challenging circumstances.

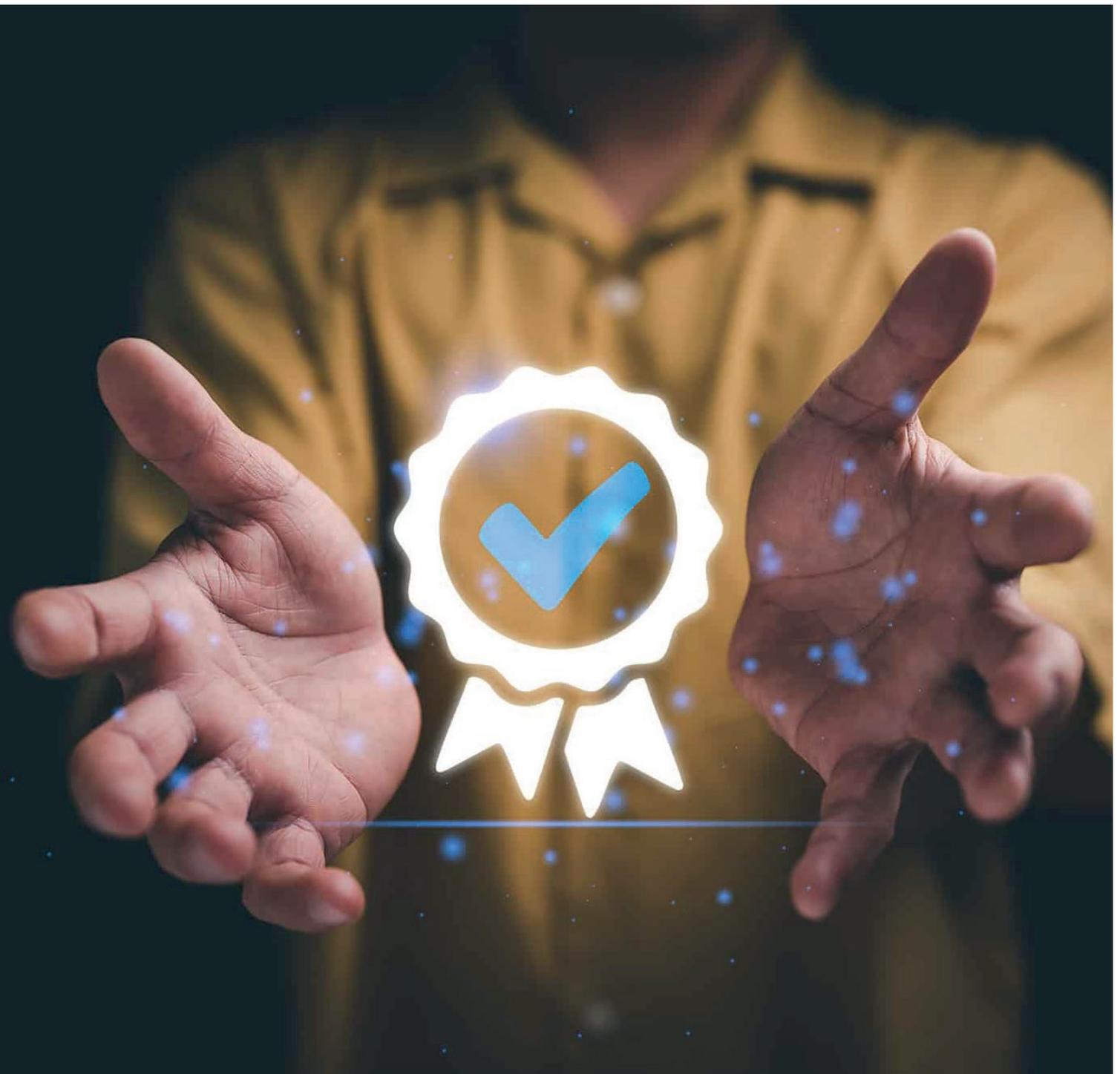
In addition, during phase 5, ITP Media still provided capacity building opportunities for the participants. On June 17, a training was held on AI use in media, exploring best practices and lessons learned of using AI tools in newsrooms and understanding technological, ethical and legal aspects that AI brings to the media production and consumption. The training was led by Oleg Khomenok, Senior Media Advisor at Internews, Board of Directors Member at the Global Investigative Journalists Network (GIJN), an International Fact-Checking Network expert. As the concluding event of phase 5 and the entire ITP, a full day final seminar was held in Tbilisi on September 28 summarising key learnings and achievements from the programme. The seminar also served as an important source of data for this report.



# 5

## KEY ACHIEVEMENTS AND CHANGES THANKS TO THE PROGRAMME

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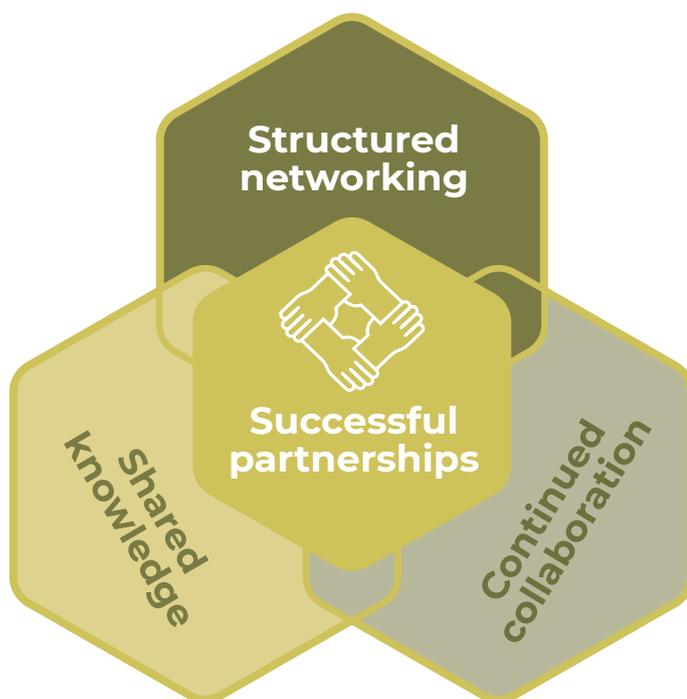


In this section, we will describe key achievements and learnings thanks to the programme. The section follows the structure of the results framework in the Inception Report.<sup>3</sup>

## 5.1. Programme outcomes (both intended and unexpected results will be reported upon)

### General overview

Based on the collected data and profile of the participants, it can be said that the ITP Media design is relevant and, under more favourable circumstances, has the potential to contribute to free, trustworthy, independent, and inclusive professional journalism in Georgia, which is the overall objective of this programme. However, the extent to which newly acquired knowledge has been used in practice, including the implementation of change initiatives, was significantly affected by the critical political situation caused by the initiation and adoption of the Law on Transparency of Foreign influence in Georgia, as well as the decisive parliamentary elections in October 2024.



Despite these challenges, the ITP experience is assessed as a valuable and relevant contribution to Georgian media, providing a better understanding of existing best international practices in EU countries. Most respondents believe that the ITP Media met their expectations (“to some extent” – 6 respondents, “to a large extent” – 9 respondents). They assessed the programme as well-organised, with diverse yet coherent topics and helpful examples from other countries. This provided a valuable opportunity to rethink and reflect upon media self-regulation and government regulation.

The programme was positively received for broadening perspectives and facilitating communication and collaboration among participants. One participant expressed that the ITP itself “... actually was a window of new opportunities”. However, it should be noted that some participants felt the relevance of the programme decreased due to the ongoing political crisis in Georgia (created by the so-called “Russian law”).

An overwhelming majority of respondents (14 out of 15) believed that the ITP experience was different from other training programmes they have attended. The key factors that make it stand out include its focus on real problems through change initiatives, the diversity of backgrounds among participants, experience-based learning and field visits, and the topic of media self-regulation.

When asked to describe their ITP experience in keywords, the most frequently mentioned words were

**“experience,”**  
**“knowledge,”**  
**“interesting,”** and  
**“productive.”**

National facilitators also confirmed that the ITP was unique and relevant due to its content, practice-oriented approach, and applied learning, in contrast to purely theoretical sessions. The thorough planning of events, including additional cultural activities, was also highly appreciated.

<sup>3</sup> With “outputs,” we refer to learnings and products such as change initiatives that have been produced in the programme. Meanwhile, with “outcomes” we refer to how the participants have made use of their learnings, i.e. all the changes we observe happening in participating organisations, in changed behavior among key stakeholders and changes in rules and regulations, thanks to the programme.



## OUTCOME 1

Individuals and organisations participating in the programme derive benefits and utilize international and national networks within the realm of media's regulatory and self-regulatory framework.

The ITP Media served as a platform for dialogue between home organisations of the participants and other key stakeholders for discussion about media regulation and self-regulation, however the extent varied – from a small extent (3 respondents) to medium (6 respondents) and high extent (6 respondents).

The participants positively assessed the inclusion of ComCom and GPB in the programme. Despite increased pessimism about cooperation with the Government due to the existing political crisis, the programme was seen as a unique opportunity to engage in dialogue with the Government stakeholders. Furthermore, through the change initiatives, ITP Media promoted cooperation and team building among different stakeholders. This was confirmed by observations from national facilitators throughout the programme, seeing how scepticism of NGOs about cooperating with the government agency was slowly transformed into mutual teamwork around change initiatives.

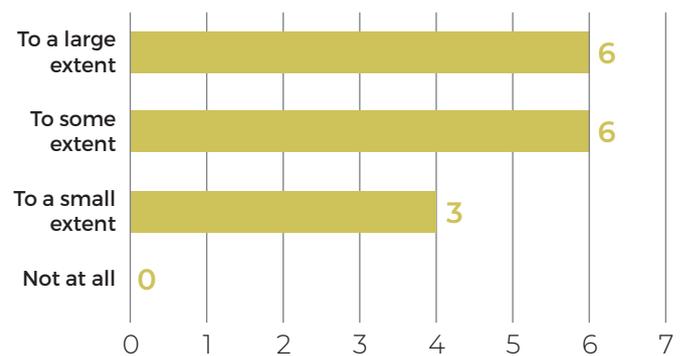
A good example of how networks established during the ITP were utilised in practice was an additional event titled "Hate Speech and Media Practices in the Pre-2024 Context" on September 24-25, 2025, which an ITP participant organised. It brought together media professionals, NGOs, and regulatory bodies from Georgia to discuss hate speech regulation and media practices ahead of parliamentary elections. The event, facilitated by networks established through the ITP Media, enabled open dialogue and collaboration among diverse stakeholders, including regional media, national broadcasters, NGOs, and the ComCom. This collaboration was crucial given the tensions between government actors and independent media. The event highlighted the importance of self-regulation mechanisms for media independence and accountability, fostering cooperation as well as increasing understanding of participants of the legal landscape and regulatory requirements. By engaging stakeholders who might not typically collaborate, the event demonstrated the ITP Media's value in enhancing cross-sector understanding, improving self-regulation capacity, strengthening media resilience, and aligning Georgian media with European standards.

**"The ITP Media included members from an already existing self-regulatory body. The programme has achieved to facilitate a stronger connection and understanding between me and my colleagues and representatives of these self-regulatory bodies."**

*Participant comment*

All 15 respondents have contact with the participants they met during ITP Media programme in Georgia. Of these, 10 meet with other participants at least once a week, while 5 respondents meet with other participants at least once in 3 months.

### ITP as a Platform for Dialogue



When asked about the most significant result that happened thanks to the ITP, more than half of respondents named networking opportunities within the country, underlining the importance and uniqueness of having common understanding between the media and ComCom as well as GPB. Participants report that the ITP Media has fostered a unique environment for dialogue between state and non-state representatives, who would not typically collaborate. ITP Media has provided external facilitation which enabled different stakeholders to get to know each other, get joint experiences and start working on joint initiatives.

**"Collaboration between government institutions, media, and NGOs was previously quite problematic, but through the programme, we were able to find a way to engage in productive dialogue."**

*Participant comment*



## OUTCOME 2

Increased knowledge and capacity to initiate and implement structured, long-term transformational work within their respective organisations.

The understanding of participants towards media self-regulation has substantially increased as a result of the ITP Media. Before the ITP Media, only 5 respondents felt they had an understanding “to a large extent”; this increased to 12 respondents after the programme. Due to the participation of highly qualified individuals, some already had a good understanding about media self-regulation before the ITP, however the programme was still considered an added value in terms understanding successful European examples in depth.

**It was important to learn about different self-regulation models in order to harvest new ideas that can be implemented in Georgia.”**

*Participant comment*

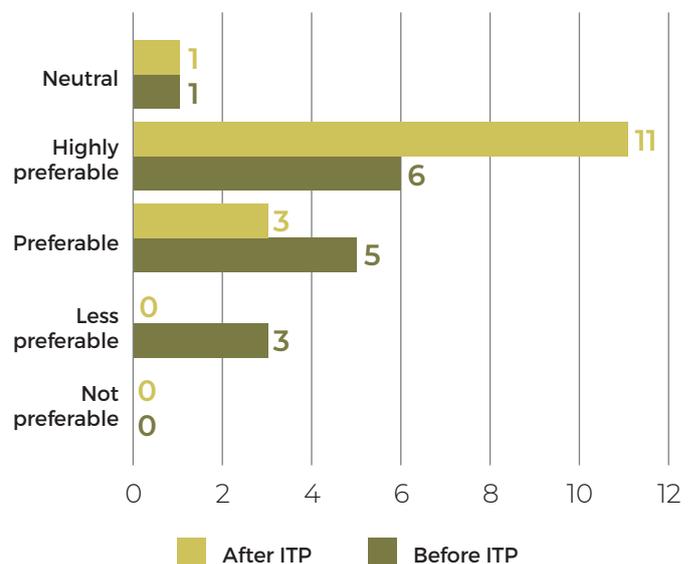
Accordingly, overall media self-regulation as a method for achieving media freedom has become more preferable among respondents, compared to before ITP. Before the ITP, only 6 participants believed media self-regulation to be highly preferable for media freedom, while afterwards the number increased to 11.



**There is no way media can be free without a strong self-regulation mechanism in the countries like Georgia. I always thought this however the ITP Media convinced me even more.”**

*Participant comment*

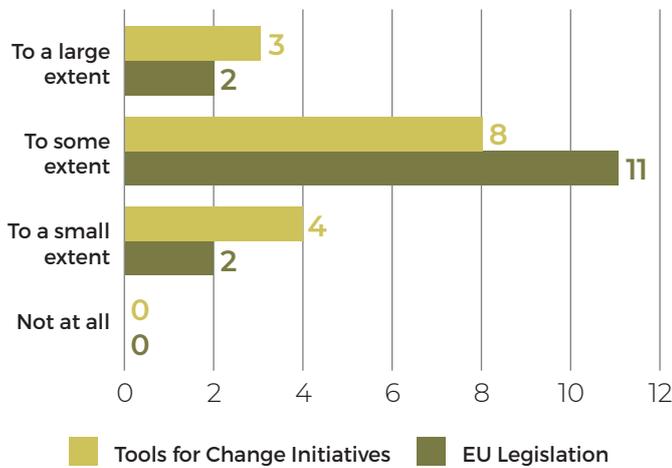
### Media Self-Regulation as a Method for Media Freedom



Understanding how media functions in developed democracies and increased commitment towards media self-regulation mechanisms was also named as one of the most significant results that happened thanks to the ITP. The experience-based learning and field visits directly to relevant institutions were especially appreciated.

Also, a clear majority of the participants have been able to use the acquired knowledge, for instance when monitoring the activities of ComCom. The upcoming elections and generally political situation in Georgia were named among the factors affecting more active use of the knowledge.

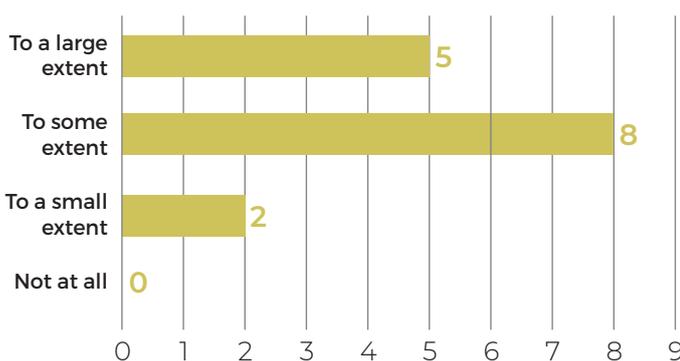
### Using knowledge in practice



At the same time, more than half of respondents are sharing the information, practice and experience from ITP participation with their organisations, local partners or networks.

Furthermore, most respondents believed that the newly learned competencies are beneficial for their organisations, and they are encouraged within their organisations to apply new knowledge and skills in practice.

### Are new competencies beneficial for your organisation?



Most respondents also thought that the ITP Media has led to a concrete change within their organisations, such as bridging a gap between home organisation and other stakeholders or adopting a self-regulation document. The organisational changes inspired by the ITP Media vary significantly across participants' institutions, with most reporting positive impacts on their workplaces. For media organisations and journalists, the programme has led to shifts in editorial

policies, emphasising self-regulation. Drawing from the expertise and international perspectives gained in Sweden, Brussels, and beyond, participants are implementing best practices that empower their teams to safeguard journalistic independence and better withstand potential censorship or governmental interference. For example, ComCom saw a direct benefit as its representatives were in the early stages of drafting regulatory documents when joining the programme. Through ITP Media, they gained strategic insights and technical knowledge on regulatory frameworks, positioning them to shape impactful policies aligned with international standards. For NGOs and media lawyers, ITP Media has enhanced their advocacy, strategic communication, and public engagement skills, enabling them to refine their messaging and amplify their impact. Many participants have brought back best practices in transparency and ethical communication, strengthening their credibility and resilience against external pressures.

At the same time, the political crisis in Georgia was named as the major obstacle for more integration of the knowledge learned through ITP within the organisations. In addition, participants have expressed the need for additional support to better apply the knowledge acquired through the ITP Media. The need for additional support included additional education [e.g. more insights about EU instruments (DSA, EMFA) in terms of their practical implications], consultant support to assess the opportunities for introducing changes based on the training, as well as access to funds to support the activities related to training topic.



### OUTCOME 3

**Participants individually and together as a team, through a multi-stakeholders/collaborative process, generate and develop ideas, and action points which will align with the recommendations put forth by the European Commission on Georgia's EU candidacy.**

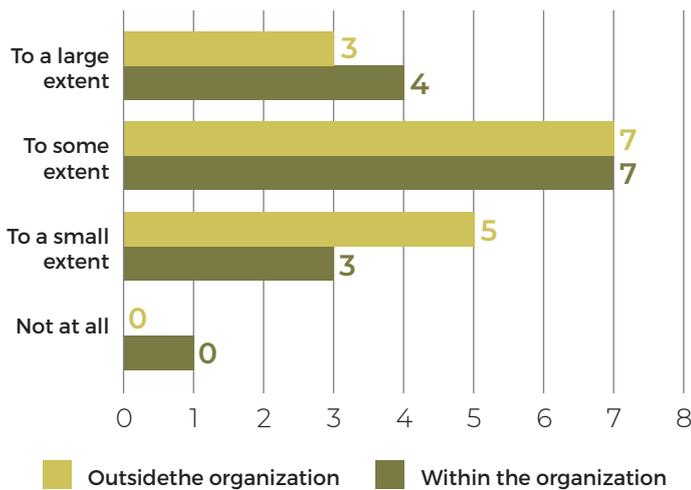
The implementation of change initiatives is currently the least visibly changed aspect of the ITP Media. The respondents found it feasible to implement change initiatives to some extent both within their organisations and outside, however the extent of implementation was seriously affected by ongoing political crisis and changed priorities for media organisations. Most respondents (11 out of 15) faced challenges when implementing change initiatives, mostly related to the tense political situation and pre-election period in

Georgia. The change initiatives were developed as long-term ideas which could be followed up by additional grant opportunities, however the feasibility is hampered by overall uncertainty around foreign assistance in Georgia.

**“The main challenge we face now is the adoption of the so called “Russian law”, which poses an existential threat to the media and no single media outlet had a will or time, or opportunity to think other things rather than that.”**

*Participant comment*

### How feasible was it to implement the change initiative?



## 5.2 Participants' key learnings (output level)

In this section, we focus on the learnings gained by participants and their organisations. The information is mainly based on surveys and interviews with a selection of the participants.



### OUTPUT 1

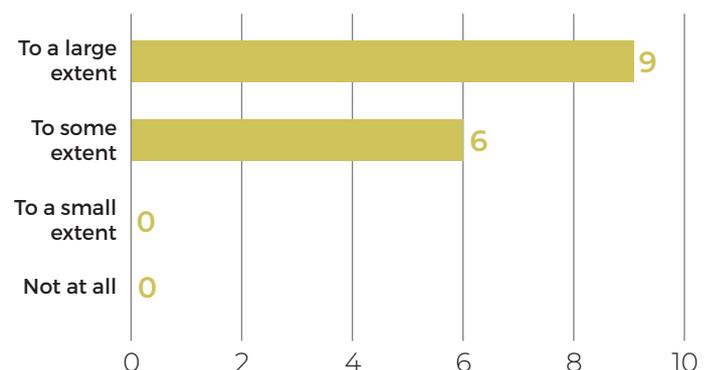
Improve the understanding of recent/proposed legislation in the EU to promote a better implementation in the respective country: AVMSD, Copyright Directive, EMFA, DSA, Political Advertising Regulation, Code of Practice on Disinformation.

The respondents have considerably increased their knowledge about relevant EU legislation, which was understood as important for both the media environment and their professional growth. Some aspects of EU legislation were explicitly noted several times as especially helpful due to their implications for digital and media sectors, such as the DSA, the DMA, the AVMSD, and EMFA. The respondents also appreciated learning about the rationale behind the legal regulations as well as their practical application by key stakeholders.

**“I had some knowledge of EU legislation, but thanks to the programme, I have deepened my expertise and can now apply this knowledge more professionally.”**

*Participant comment*

### Increased knowledge on EU legislation

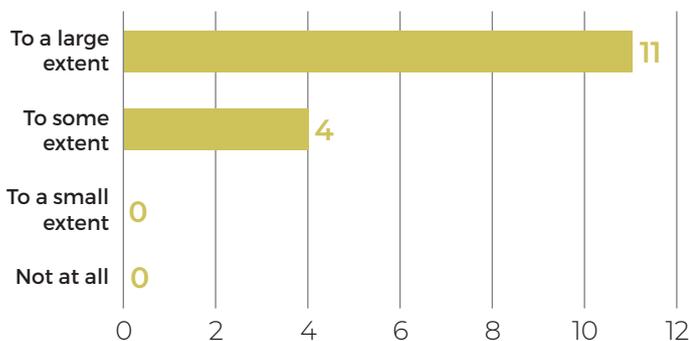


**/// ITP was helpful to see how these acts (especially DSA and EMFA) are perceived in practice and why they matter for stakeholders (e.g. publishers associations, media outlets why they advocate for protection from big platforms and how EU legal instruments might be helpful)"**

*Participant comment*

The respondents also believed that ITP Media increased their understanding about what Georgia needs to do to live up to EU standards in terms of media regulation. The important aspects from lessons learned included media pluralism, transparency, independence, protection of journalists and strong democracy in general, and practical examples were appreciated. Some participants believed they already had good understanding of EU standards and what Georgia needs to do, so they did not learn as much. Furthermore, the respondents thought that the tense political environment created substantial threat towards Georgia's European future as well as adherence to EU standards in media.

### Increased understanding about EU Media standards



### OUTPUT 2

**Participants gain an understanding of the intersection between media, freedom of expression, human rights including gender equality, and democracy.**

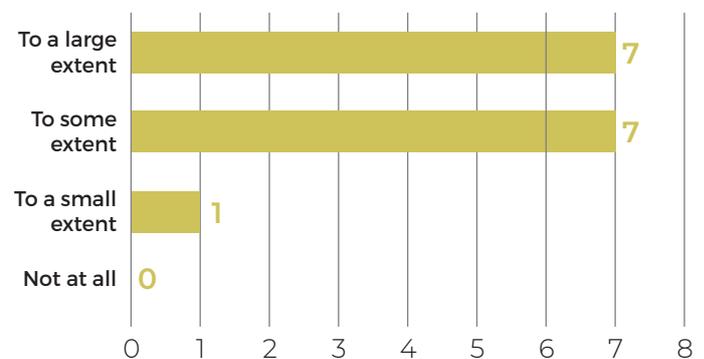
The ITP has increased respondents' understanding about connection between media and freedom of expression, human rights including gender equality and democracy by underlying the importance of allowing diverse and independent voices in the media. Some respondents already had a solid understanding

of these topics, nevertheless it was considered a valuable part of the programme which allowed for deeper understanding.

**/// This is another issue that we were well informed about before, but this direction was interestingly presented in the programme, and it was good to share experiences."**

*Participant comment*

### Increased understanding of the connection between the media and human rights



### OUTPUT 3

**Participants have access to expanded international and national networks as support for effective work with regulatory and self-regulatory frameworks.**

The respondents have considerably expanded their networks, both nationally and internationally, although the national impact was slightly higher.

Networking within the country was perceived as one of the biggest advantages of the programme and a rare opportunity for the government and non-government stakeholders to collaborate. A great value was seen in these new connections as a key for effective work on media self-regulation and the majority felt positive about the national network.

**/// I gained great friends and allies with whom I continue to cooperate in other capacities too"**

*Participant comment*

At the same time, the current political tension was still seen as a considerable obstacle towards national network, as it hinders effective collaboration across different sectors. In this regard the ITP Media was seen as a valuable source of information about how sectors cooperate in other European countries, as the goal towards which Georgia is still striving.

**“[...] given the political realities of our country. We are still on different sides.”**  
*Participant comment*

The respondents also appreciated ITP Media for giving them the opportunity to connect with international experts working on media regulation and self-regulation, which increases learning opportunities for Georgia. Some respondents noted that they are still in touch with the experts met during the ITP Media. At the same time, the intensity of international network was understood to be much lower than national network and was more perceived as a useful additional resource when needed rather than as a more immediate part of their daily work.

**“Participation in the programme made possible to get to know established professionals in this field internationally and it was very helpful.”**  
*Participant comment*

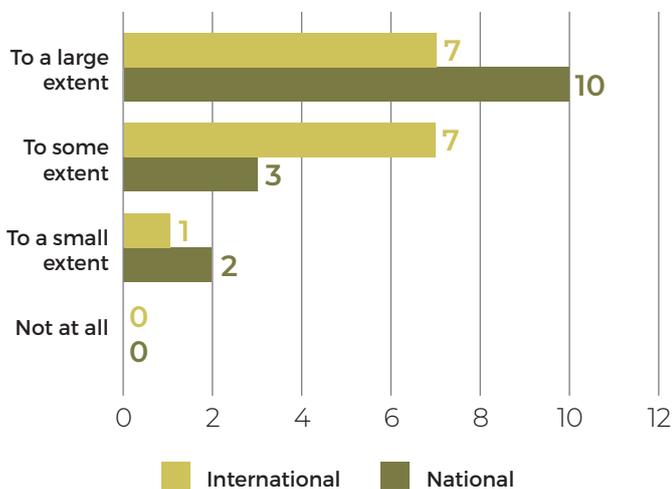
**“[...] we have the contacts of the people we met, so if needed, I believe we can expect their support for the project.”**  
*Participant comment*

**OUTPUT 4**  
 Participants have a better understanding of the various parts of the self-regulatory framework and explore different areas and methods of applying this framework.

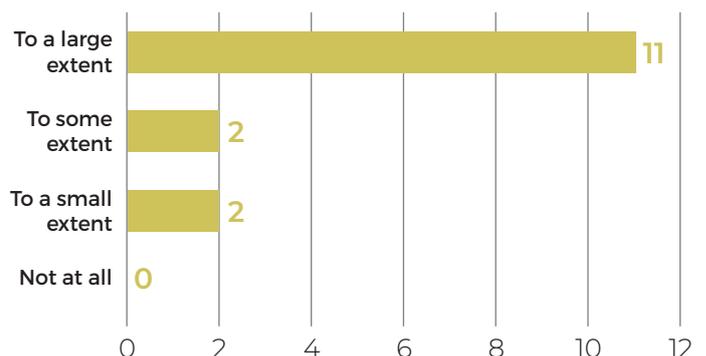
Most respondents have considerably increased their knowledge of media self-regulation method because of the ITP Media. According to the respondents, they now have a better understanding how media self-regulation works in democratic countries, and it was important to see how it works in practice in Sweden and Belgium. Furthermore, self-regulation was seen clearly as a flexible, media-driven approach to uphold journalistic standards while safeguarding free speech without excessive government intervention, and as the only feasible path for media independence and accountability of Georgian media as well. However, a few participants had a higher level of knowledge from the beginning and found the programme a bit too general.

**“I think this question doesn’t require a lengthy answer. From top to bottom it covered all major aspects in my opinion.”**  
*Participant comment*

Expanded networks



Increased knowledge of media self-regulation method



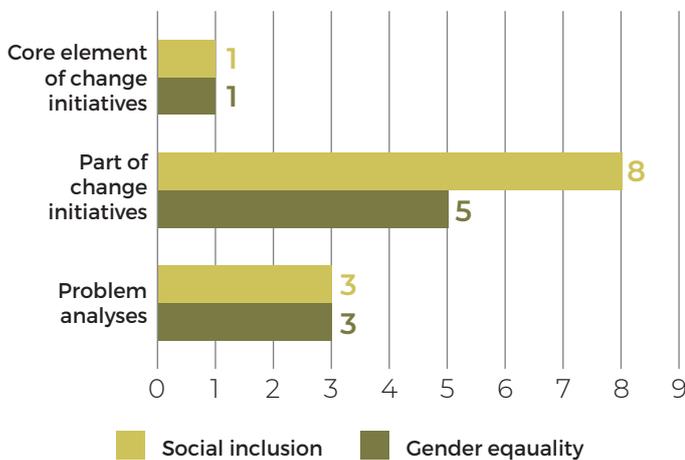


## OUTPUT 5

**Participants have a higher degree of awareness of digital security threats, including of gendered nature, and safety for independent media actors.**

Of 15 respondents, 9 said they included gender equality and/or social inclusion aspects in their change initiatives. While few included these aspects as core elements in the change initiatives, most included these aspects either in problem analysis or the suggested solution to the problem.<sup>4</sup>

### Gender equality and social inclusion



Most respondents believe that AI has some impact on media regulation in terms of content moderation, data privacy, and algorithmic accountability. The participants understand that this impact is expected to increase, even if at slower rate in Georgia.

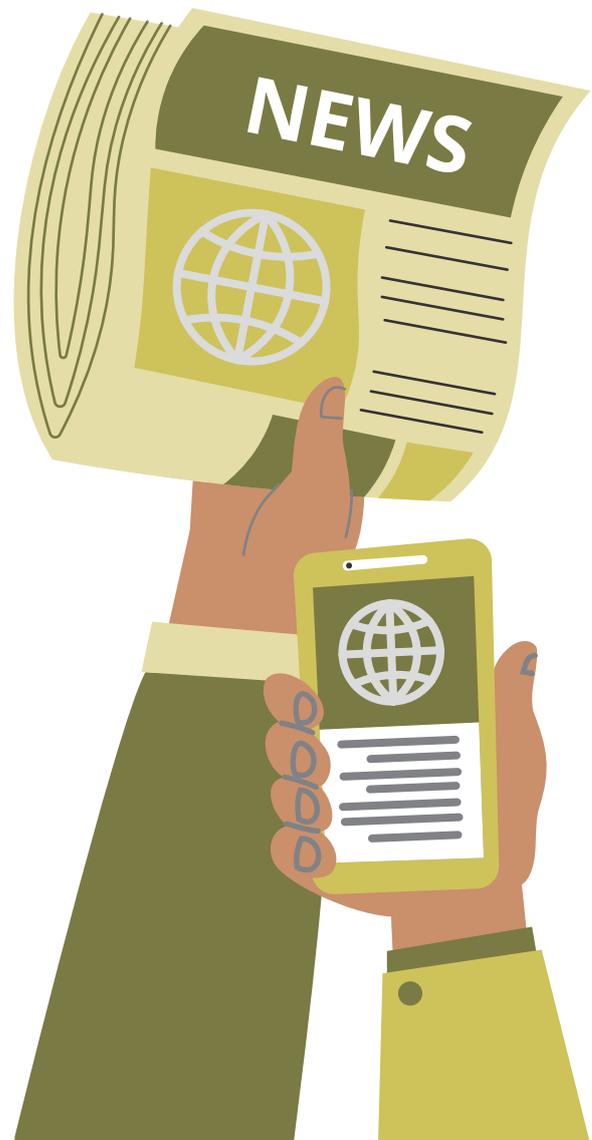
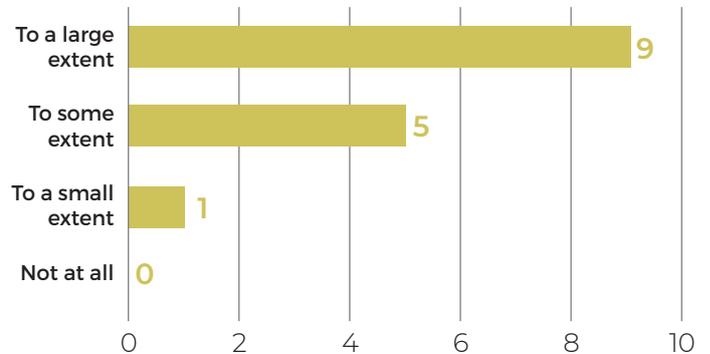


## OUTPUT 6

**Participants have increased knowledge of experiences, methods, and tools, as well as strengthened self-confidence to conduct structured, long-term change work and dissemination of knowledge and experiences obtained through the programme.**

More than half of respondents found the ITP Media effective in increasing their knowledge and skills for designing and implementing the change projects. However, the tense political situation was cited as a considerable obstacle and threat for fruitful continued work on the elaborated projects.

### Increased knowledge about change projects



<sup>4</sup> More than one response was possible

### 5.3. Summary of the change initiatives (what has been done so far)

In this section we summarise the main objectives and key activities so far in the four change initiatives that were formed during phase 2 of the programme and further developed during phase 3 to 5.



#### CHANGE INITIATIVE #1

Entertaining with media literacy – creating a media literacy model for Georgian kindergartens

Georgian kindergartens

#### Change Initiative #1 Participants

Georgian Public Broadcaster

Georgian Media Group

Communications Commission (ComCom)

NGO Open Borders, Jnews

TOK TV

#### Problem definition and objectives

The overall objective of this change initiative was to develop and implement a comprehensive model of media literacy tailored specifically for kindergartens across Georgia. This initiative aligned with Georgia’s commitment to enhance media literacy as outlined in the EU Association Agreement. Georgia currently faces a significant challenge in this area, as it holds the lowest media literacy index among EU associated countries. The initiative aims to address this issue by focusing on an underrepresented demographic - kindergarten-aged children - who have not been previously targeted by existing media literacy programmes.

The primary focus of the change initiative was on kindergartens, especially those located in municipalities with significant ethnic minority populations. These include children, parents, kindergarten management

agencies, and local government bodies. By targeting this group, the initiative aimed to build foundational media literacy skills from an early age, equipping children with the ability to critically engage with media content as they grow. Additionally, the broader community - including professional associations, CSOs, the media, and society at large - are considered vital stakeholders.

#### Results

To achieve the goals of the initiative, a series of strategic activities were undertaken:

1. Research and best practice analysis: The team conducted an in-depth analysis of successful media literacy programmes implemented worldwide, focusing on best practices from countries known for their effective strategies. This was especially crucial in understanding how to adapt existing models to suit Georgia’s unique cultural and linguistic context.
2. Consultations with international experts: To bring global expertise to the initiative, consultations were held with media literacy specialists from Scandinavia. These experts provided insights on integrating media literacy concepts into early childhood education, as Scandinavian countries have been recognised for their robust and effective approaches in this field.
3. Creation of multilingual educational cartoons: The culmination of these efforts was the production of animated cartoons designed to teach basic media literacy concepts. These cartoons were created in Georgian and translated into three additional languages (Armenian, Ossetian, and Russian) to ensure accessibility for children from various ethnic backgrounds. The decision to use cartoons was based on their ability to capture children’s attention and simplify complex ideas through storytelling and visual elements.

The initial rollout of the initiative has already resulted in two educational cartoons. They are available in four languages (Georgian, Armenian, Ossetian, and Russian), and allow children from diverse backgrounds to access the content in their native languages.

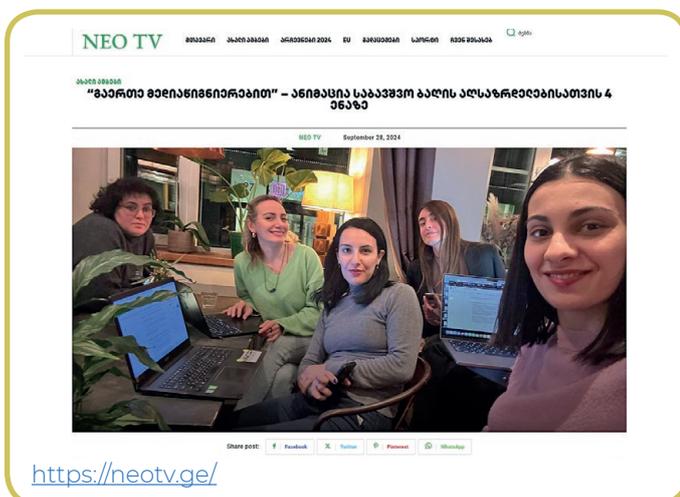
#### Next steps

The long-term vision of the change initiative is to establish kindergartens as central hubs for media literacy education across Georgia. Key expected outcomes include:

- Expansion of media literacy programmes: By demonstrating the success of the initial pilot, the initiative aims to encourage media literacy organisations to extend their focus to kindergartens across the country. This will involve the development of more educational tools and resources, including new cartoons, interactive games, and workshops designed for young children.
- Adaptation of educational methodologies: Kindergartens will be equipped with teaching methodologies specifically adapted to address the challenges of the digital age. This will ensure that children are not only passive consumers of media but can actively and critically engage with the content they encounter.
- Enhanced critical thinking skills: As children exposed to media literacy education advance through the education system, they are expected to demonstrate higher levels of critical thinking. This will not only enhance their academic performance but also prepare them to become more informed and responsible citizens in the future.

By targeting children at a formative stage in their development, this change initiative aims to lay the groundwork for a more media-literate society in Georgia, fostering a new generation that can navigate and interpret media content thoughtfully and critically.

The change initiative had media coverage about the implemented activities. NEO TV posted an online article about the project as well as four animation prepared in Georgian, Russian, Ossetian and Armenian languages. The article is available on the following link (in Georgian).



## CHANGE INITIATIVE #2

Press Freedom Guard – a legal toolkit for journalists in Georgia

### Change Initiative #2 Participants

Georgian Democracy Initiative (GDI)

Media Development Foundation

Sova News

Project 64, Mediachecker

Journalism Resource Center

### Problem definition and objectives

The objective of the change initiative “Press Freedom Guard” was to increase awareness of media representatives about hate speech legislation and strengthen ethical standards by developing a concise and accessible legal toolkit that clarifies relevant legislation for broadcast media representatives in Georgia. The initiative aimed to address concerns about press freedom, especially regarding how current regulations may impact journalists’ ability to operate freely and ethically. This guideline will help journalists understand the legal frameworks governing their profession, what the law regulates, how it can potentially be used against them, and how they can uphold ethical standards within these legal boundaries. The initiative responded to concerns voiced by international partners and local civil society organisations, who have raised alarms about the influence of the ComCom, a body perceived to have political affiliations. Specific problems identified by the team included:

1. Increased risk of self-censorship: Due to unclear regulations and fear of punitive measures, many journalists have begun practicing self-censorship, which limits free and open discourse.
2. Uncertainty around hate speech regulations: Journalists are often unsure about the criteria for hate speech, the scope of what constitutes hate speech, and the legal consequences associated with it.
3. Limited awareness and understanding: There is a general lack of awareness among journalists re-

garding how hate speech laws can affect their work and the procedures for addressing such issues in the broadcast sector.

Given these challenges, the initiative seeks to empower journalists by providing clear, practical information on how to navigate legal and ethical standards effectively.

The primary objectives of “Press Freedom Guard” were:

1. Raise awareness of hate speech legislation: By offering a straightforward explanation of the relevant laws, the initiative sought to enhance journalists’ understanding of what constitutes hate speech and the potential legal consequences. This will enable them to make more informed editorial decisions.
2. Strengthen ethical standards in the media: The toolkit was designed to encourage journalists and broadcasters to uphold higher ethical standards. This includes understanding how to report on sensitive topics without resorting to hate speech, thus fostering a more responsible and balanced media environment.

The toolkit will be made available to a wide range of stakeholders to ensure comprehensive coverage and impact. Key stakeholders include:

- National and regional broadcasters: These organisations will receive the toolkit to help their journalists understand and apply the guidelines effectively in their daily reporting.
- Ethics charter: An essential partner in promoting ethical journalism, the ethics charter will help disseminate the toolkit and encourage its adoption across the media sector.
- Media advocacy coalition: This coalition, which focuses on defending press freedom, will support the initiative by advocating for the widespread use of the toolkit.
- ComCom: Although the Commission’s political influence is a concern, engaging with them is necessary to ensure the guidelines align with current regulations and foster a transparent dialogue.

The toolkit will be translated into Georgian and the languages of ethnic minorities (Armenian and Azerbaijani) to ensure accessibility across diverse communities and to support minority broadcasters in understanding and applying these legal standards.

## Results

The initiative involved several key activities to ensure effective implementation:

1. Development of the legal toolkit: The team worked closely with legal experts and media professionals to create a comprehensive guideline that simplifies complex legal concepts. The toolkit includes clear explanations of relevant laws, practical examples, and scenarios that illustrate how these regulations might affect everyday broadcasting practices.
2. Training sessions for journalists: To ensure that the toolkit is effectively utilised, the initiative conducted training workshops for journalists. These sessions helped explain the content of the guidelines, addressing common concerns and encouraging open discussions on how to manage challenges related to self-censorship and hate speech.
3. Distribution of the toolkit: The final toolkit was distributed to seven national broadcasters, ensuring that media outlets across Georgia had access to this resource. Efforts were made to engage smaller, regional broadcasters as well, particularly those who may not have the resources to access legal counsel on these issues.

In the initial phase, the initiative achieved several short-term results:

- Training of media representatives: The initiative successfully trained 15 representatives from various television networks across Georgia. These training sessions equipped journalists with the knowledge to navigate the nuances of hate speech regulations and understand the broader legal landscape affecting their work.
- Distribution of the legal toolkit: The guideline was distributed to seven national broadcasters. Feedback from these organisations indicates a positive reception, with journalists expressing increased confidence in understanding their rights and responsibilities under current laws.

## Next steps

The long-term goal of the “Press Freedom Guard” initiative is to create a media environment in Georgia where journalists can report freely and ethically without fear of unjust legal repercussions. By equipping media professionals with a better understanding of relevant laws, the initiative aimed to:

- Reduce self-censorship: When journalists clearly understand the legal frameworks, they are less likely to

cancel themselves out of fear of potential sanctions. This will promote a freer and more open media landscape in Georgia.

- **Improve ethical standards:** Through better awareness and understanding of hate speech criteria, journalists can avoid inadvertently perpetuating harmful stereotypes or spreading inflammatory content. This will contribute to more responsible and balanced reporting, fostering greater trust between media outlets and the public.
- **Strengthen media advocacy:** The initiative will help build a foundation for ongoing advocacy efforts, encouraging the development of further resources that support press freedom and ethical journalism in Georgia.

Overall, “Press Freedom Guard” sought to empower broadcasters and journalists by providing them with the knowledge and tools to operate within legal frameworks confidently while upholding the highest standards of journalism. By fostering an environment where press freedom is protected, the initiative contributes to the broader goal of ensuring democratic values and freedom of expression in Georgia.



### CHANGE INITIATIVE #3

**Establishing an appeal mechanism out of regulatory institutions, improving the existing system and promoting the creation of self-regulation where there is none.**

#### Change Initiative #3 Participants

Media Development Foundation

Community Radio Marneuli

On.ge

Communications Commission  
(ComCom)

NEO TV



#### Problem definition and objectives

This change initiative aimed to bolster self-regulation within Georgia’s media landscape by creating a reliable, independent appeals body through the Georgian Charter of Journalistic Ethics. By doing so, it sought to enhance the effectiveness, transparency, and public trust in media outlets. The initiative addressed existing gaps in self-regulation, particularly within the online and print sectors, fostering a media environment where high journalistic standards are consistently upheld and respected. The initiative proposed the establishment of an appeals body under the Georgian Charter of Journalistic Ethics, an existing institution that has already gained credibility for its commitment to upholding journalistic integrity. By building on this foundation, the initiative aimed to create a mechanism that will handle disputes efficiently and independently, away from political influence, thus contributing to a more robust self-regulation framework.

The change initiative outlined two potential approaches for developing the appeals mechanism, either to expand the current functions of the Georgian Charter of Journalistic Ethics, which already has significant experience in handling media disputes and appeals, or to establish a new appeals board which could allow for better handling of a higher volume of cases and provide more specialised focus on appeals. The overarching

goal of the initiative was to strengthen self-regulation in Georgia’s media, thus enhancing public trust and ensuring journalistic integrity. The key objectives were:

1. Establish the Georgian Charter of Journalistic Ethics as an independent appellate body: Position the Charter as the primary institution for addressing media disputes, ensuring that it functions independently of political influence and serves as a reliable mechanism for maintaining high journalistic standards.
2. Increase public awareness and engagement: Raise awareness about self-regulation mechanisms and educate the public on how to engage with these systems. This will encourage audience involvement in maintaining ethical standards, fostering a more informed public.
3. Promote dialogue among media outlets: Create a platform for media outlets to engage in discussions about journalistic standards, ethics, and self-regulation. This collaborative approach will help ensure consistent adherence to ethical guidelines across the industry.

The initiative aimed to produce several immediate outcomes that will set the foundation for long-term change:

1. Strengthened media and higher journalistic standards: By implementing self-regulation mechanisms effectively, media outlets will adhere more closely to established standards, resulting in improved journalism and greater public trust.
2. Reduction of political manipulation and polarisation: Moving the resolution of journalistic disputes to an independent body will reduce the influence of government-affiliated institutions on media content. This shift is expected to lower the level of political speculation and decrease media polarisation.
3. Increased audience engagement and awareness: Through education and outreach, the initiative will encourage the public to engage more actively in discussions about journalistic ethics. This will lead to a better-informed audience that can identify disinformation and manipulation, fostering a culture of media literacy.
4. Preservation of media independence: By establishing an appeals mechanism that is free from political influence, the role of independent media will be strengthened. Media outlets will be better able to maintain their editorial independence, ensuring that content production is based on ethical and professional standards.

## Results

To achieve these objectives, the initiative laid out a series of strategic activities:

1. Developing and amending Charter statutes: Should the need arise for a separate appeals board, the team will work on drafting amendments to the Charter’s statutes to ensure clear, structured guidelines for electing and governing the appeals board.
2. Awareness campaigns and public outreach: The initiative will engage in public education efforts, including workshops, informational campaigns, and collaboration with media outlets to explain the benefits of self-regulation and the appeals mechanism. This will help build public support and awareness.
3. Dialogue and engagement with media organisations: The team will host forums, roundtable discussions, and networking events to encourage media organisations to adopt self-regulation practices and actively participate in the proposed appeals mechanism.
4. Collaboration with local and international partners: Efforts will be made to work with local CSOs and international partners to secure support, share best practices, and ensure that the self-regulation framework aligns with global standards.

## Next steps

The long-term goal of the change initiative was to create a media environment in Georgia where self-regulation is the norm, trusted by the public, and free from external influence. Key anticipated impacts include:

1. Increased trust between media and the public: By upholding ethical standards consistently, media outlets will gain credibility, leading to stronger trust from the public. As the appeals mechanism becomes more established, it will serve as a symbol of accountability and transparency.
2. Reliable self-regulation mechanism: Over time, the self-regulation framework, anchored by the independent appeals body, will be seen as a reliable and effective method for addressing disputes, reducing the need for government intervention and potential censorship.
3. Enhanced media credibility and integrity: Consistent adherence to journalistic standards will improve the overall quality of media content, supporting the role of the press as a cornerstone of democracy.
4. Strengthening democracy: By ensuring that media content is produced free from political bias and

manipulation, the initiative will contribute to a more informed public, which is essential for a functioning democracy.

Overall, this change initiative sought to establish a sustainable, independent self-regulation system for Georgia’s media sector. By creating a reliable appeals mechanism and promoting widespread adherence to ethical standards, the initiative will not only enhance media integrity but also strengthen the democratic fabric of the country.



#### **CHANGE INITIATIVE #4** **Enhance internal self-regulatory mechanisms**

##### **Change Initiative #4 Participants**

**The Georgian Charter of Journalistic Ethics**

**iFact**

**Chai Khana**

**Communications Commission (ComCom)**

**The Georgian Charter of Journalistic Ethics**

#### **Problem definition and objectives**

The objective of this change initiative was to develop and support self-regulatory mechanisms for online media outlets in Georgia that currently lack internal self-regulation or are not legally required to implement such practices. Many digital media outlets in Georgia do not have established internal mechanisms to regulate content or uphold journalistic standards. This lack of self-regulation can lead to issues such as misinformation, bias, or unethical reporting practices, ultimately eroding public trust in the media. To address this, this initiative aimed to introduce a media ombudsman institution, a neutral, independent entity that can oversee the ethical conduct of online media, address public complaints, and ensure greater trans-

parency in content production. By fostering self-regulation, the initiative sought to uphold journalistic integrity and strengthen the credibility of online media, thereby enhancing public trust and contributing to a healthier democratic environment.

The introduction of a media ombudsman was a cornerstone of this change initiative. The ombudsman will serve as an independent figure who can:

- Monitor ethical standards: Oversee adherence to the code of conduct and address issues of non-compliance.
- Address public concerns: Act as a mediator to handle complaints from the public regarding content that may be deemed inaccurate, biased, or unethical.
- Promote transparency: Provide regular reports on media practices, helping to build accountability and trust between media outlets and their audiences.
- Resolve internal disputes: Assist media organisations in managing internal conflicts related to editorial decisions or ethical concerns.

The initiative emphasised the fundraising strategy and opportunities for the media ombudsman institution, underscoring its critical role in upholding journalistic integrity. By ensuring accuracy, fairness, and transparency, the ombudsman can significantly enhance the credibility of online media, foster public trust, and contribute to a stronger democratic society.

#### **Results**

The team undertook several key activities to lay the groundwork for this self-regulation mechanism:

1. Code of conduct: The code of conduct is based on the Georgian Charter of Journalistic Ethics, along with principles from Reuters, BBC, SPJ, and insights from independent media experts and addresses seven topics: accuracy; impartiality and independence; non-discrimination; sensitive reporting; proper ad placement; prohibition of plagiarism; and restrictions on hidden recordings
2. Advocacy and awareness: The team prepared a rationale that highlights the importance of a media ombudsman and presented this to foreign aid actors. This advocacy aimed to secure support for the initiative and demonstrate its potential to improve the quality of journalism in Georgia.
3. Pilot implementation: The new self-regulation system has already been introduced to two online me-

dia platforms. These platforms are now using the guidelines and engaging with the ombudsman mechanism to address ethical issues and public complaints.

The initiative has achieved several important short-term milestones:

- Adoption by two online media outlets: Two digital media platforms in Georgia have successfully integrated the new self-regulation mechanism. Early feedback from these outlets suggests that the code of conduct and ombudsman role have already helped in addressing internal concerns and improving content standards.

### Next steps

The long-term vision of the initiative was to establish a widespread culture of self-regulation within Georgia’s online media landscape. To achieve this, the next steps include:

1. Expanding outreach to media organisations: The team plans to engage with more online media outlets, encouraging them to adopt the self-regulation mechanism. This will involve presentations, workshops, and personalised consultations to explain the benefits of the code of conduct and the ombudsman role.

2. Securing long-term funding: The team will continue to advocate for sustained support from local and international stakeholders to ensure that the media ombudsman institution can operate independently and effectively.

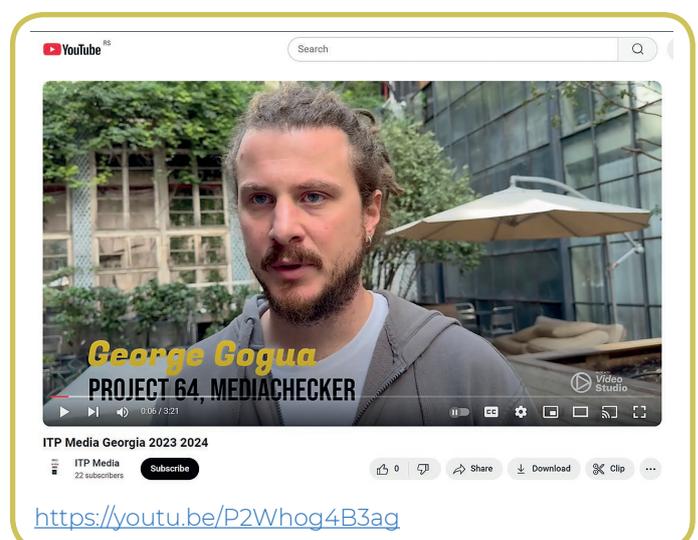
By promoting self-regulation through an independent ombudsman, the initiative aimed to:

- Uphold journalistic integrity: Encourage media outlets to adhere to ethical standards, thereby improving the quality of journalism and reducing the spread of misinformation.
- Enhance media credibility: Help rebuild public trust in media by ensuring transparency and accountability in content production.
- Strengthen democracy: Support a free and responsible press, which is essential for informed public discourse and democratic governance.

## 5.4. Testimonies from participants on learnings, results and spin offs

The programme has been quite influential for many of the participants. As one participant described in the survey, “So far, this programme has been one of the most influential events in my career. It has had a great effect on me on a personal level as well.”

Participants describe what the programme meant to them and their organisations in videos hosted on our YouTube channel that can be accessed at: <https://youtu.be/P2Whog4B3ag>.



# 6

## CONCLUSIONS, LESSONS AND SUGGESTIONS

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In this section, the programme management has reflected on the findings from the survey, interviews, and experiences implementing the programme.

## 6.1. Conclusions and lessons learnt - programme management's reflections

Overall, there has been considerable progress in learning, especially on issues related to self-regulation as a method to foster media freedom and meet EU requirements. The participants have a strong national network within the realm of media's regulatory and self-regulatory framework, including EU accession requirements. One notable benefit of the programme is that there is now an open channel and better mutual understanding between the ComCom and key stakeholders in the media sector. Change initiatives have been elaborated and activities implemented, yet changes are difficult to pursue due to political reasons and the short time since they started.

### Platform for dialogue and joint effort

This programme has demonstrated the power of collaboration and dialogue in driving meaningful change within the media sector. The main added value of the ITP has been its ability to serve as a “platform for dialogue” that brings together stakeholders who would not typically collaborate, effectively breaking down silos. The programme has provided a safe space for open dialogue, encouraging discussions around self-regulation and co-regulation within the media sector. As a result, throughout the programme, we have witnessed the formation of tight bonds, trust, and mutual respect among participants from diverse backgrounds, including governmental agencies, the ComCp., media organisations, journalists, lawyers, and civil society activists. This exchange has involved stakeholders who may initially hold divergent perspectives, and this spirit of cooperation has been instrumental in fostering a sustainable foundation for self-regulation and co-regulation within the Georgian media landscape.

It is evident that the collaboration and strong bonds formed between stakeholders are key achievements of the ITP Media and may also be a crucial asset for its sustainability. We have learned that familiarity, friendship, and trust, though not easily measurable, are essential in growing the “sense of community”. Inspiration, motivation, and continuous communication have

been crucial in sustaining coalition and collaboration. The trust and friendships that have been formed and developed among the participants provide a sustainable foundation, which will likely be important for upcoming initiatives. One of the most important results of this programme is the opening of communication channels and fostering of friendships between personnel from the state agency, the ComCom, news organisations, journalists, lawyers, and activists. The ITP is currently one of the few arenas for such interchange between the state and civil society. The participants have joined the programme driven by a genuine desire to bring about meaningful change within the media sector. The Georgian group's commitment to these initiatives is strong, even without external funding. The programme has sparked new ideas, and participants have laid the groundwork for future implementation (especially when/if political conditions in the country improve).

### Joint effort for change initiatives

The success of the change initiatives, whether it was developing media literacy models for kindergartens, empowering journalists with legal toolkits, or creating independent self-regulation mechanisms, stems from the participants' genuine commitment to improving the media environment in Georgia. Despite the challenging political situation, which has occasionally hindered the implementation of some project activities, the programme has sparked numerous new ideas and laid the groundwork for future advancements when conditions improve. The unwavering dedication of participants, even without external funding, is a testament to the desire for driving change.

### Importance of facilitators

National facilitators and engaged experts have been crucial to the success of this programme. Their insights and guidance have ensured that the change initiatives were realistic and feasible, while also promoting group cohesion and inspiring participants to go beyond their initial ambitions. Most participants also believe that the support provided by the national facilitators was useful for them. The ITP's inclusive approach, integrating minority perspectives and gender considerations, has enriched the programme's impact. By treating participants as resource persons rather than students, the pedagogical approach has empowered them to take ownership of their projects, leading to higher-quality initiatives and a stronger commitment to their success.

## Challenges and lessons learned

It should however be noted that in other ITPs, change projects evolve over 4-5 years. In this programme, we only had 1+1 year, making this programme more vulnerable to contextual changes, even though some organisations (e.g. ComCom and Georgian Charter of Journalistic Ethics) had participated in the previous ITP as well. We also encountered challenges with participant motivation and engagement due to the unfavourable political climate, which led participants to feel their efforts were less prioritised or even futile. Additionally, high-profile participants with demanding professional lives found it challenging to maintain a continuous commitment of time.

## Adaptive management

From a project management perspective, the implementation of the programme has clearly demonstrated the importance of maintaining close dialogue with stakeholders. It has also highlighted the necessity of being adaptable to meet evolving needs and seizing opportunities as they arise. This approach ensures that the project remains aligned with stakeholder expectations and can respond effectively to any changes or new possibilities that emerge during its lifecycle.

Throughout the process, we maintained a dialogue with the Swedish Embassy, our financier, adapting to the current context and making necessary adjustments to activities to keep the results at the forefront. For example, towards the end of the programme, the focus was placed on activities within the change project rather than on additional webinars as initially planned.

Furthermore, it should be noted that the Swedish Embassy in Georgia has been highly engaged, with the responsible programme officer establishing several key bilateral contacts with participants. This has been highly appreciated by the participants themselves and has also laid the groundwork for future cooperation and contacts. We believe that the active engagement of the Swedish Embassy and its programme officers has promoted valuable bilateral connections, hopefully paving the way for future activities and cooperation.

Although, we have effort to adapt to changes some participants believe the programme could benefit from even greater flexibility and consideration of the local context when planning and implementing activities.

## Sustainability

In mentioning key factors that could ensure the sustainability of the programme’s results, the participants primarily highlighted additional opportunities (follow-up activities, alumni meetings, alumni grant programs, additional opportunities for networking nationally and internationally as well as further support in implementation of change initiatives), a stable political context in Georgia, and the willingness of each participant to stay committed.

Overall, the key success factors identified include the emphasis on networking and collaboration, flexibility to adapt to changing circumstances, a focus on self-regulation, and a strong commitment to continuous learning and development. Although the current political situation is difficult and uncertain, these elements have given participants hope for a more transparent, credible, and resilient future for the Georgian media landscape.

## 6.2. Suggestions how to build further on the ITP both for participants themselves and for the Swedish Embassy in Georgia

Based on findings and lessons learned, below are some overall suggestions for possible similar capacity development programmes in the future. Some of these suggestions are directed at the Swedish Embassy in Georgia while others are directed at the participants directly.

### Suggestions to Swedish Embassy

In the current Swedish strategy for reform cooperation in Eastern Europe 2021-27, it is stated that “...priority will be given to helping build resilience to anti-democratic influences, not least through support for freedom of expression and free and independent media.”<sup>5</sup> Meeting venues for discussing challenging and sensitive topics are scarce in today’s polarised world. We suggest that the Swedish Embassy and

<sup>5</sup> <https://www.swedenabroad.se/globalassets/ambassader/moldavien-chisinau/documents/strategy-swedish-reform-cooperation-with-eastern-europe-2021-27.pdf>

Sida (if the political situation allows) continue to provide such platforms for dialogue.

Throughout this programme, the Swedish Embassy has gained strategic access to important networks that could be further nurtured and utilised. These contacts will serve as important entry points, especially after the election, when the political and media landscape evolves.

Given the critical context in Georgia, the respondents have expressed gratitude and request for any support to independent media. Some topics have explicitly been mentioned:

- More education and training in the direction of modern technologies,
- National security and open-source intelligence (OSINT), the Network and Information Security Directive, national security, cyber security and media literacy,
- Professional development trainings and supporting fellowships, as well as advocating for journalists' rights and freedom of the press in the country, and
- Financial and organisational support to small local media outlets and regional media that works for ethnic minorities, as well as to NGOs advocating free speech.

These preliminary ideas need to further be analysed and discussed with the relevant stakeholders.

Some participants also suggested more careful selection of participants to ensure motivation and capacity for participation, as well as including target groups such as major media stations (TV, radio) and focusing a programme on students too.

### Suggestions for the participants:

Although we understand the current difficulties, participants can continue to contribute to the development of free, trustworthy, and independent media in a few ways. The participants are advised to continue implementing the developed change initiatives when the political situation allows it, adapting and iterating them as needed. It will be important to try to maintain the ITP network and keep communication channels open between media, civil society, and state agencies like ComCom. Encourage multi-stakeholder discussions and engage international and regional experts to find constructive solutions. Furthermore, the participants are encouraged to keep connection with media outlets in Sweden and other ITP countries to support the struggle for media freedom in Georgia.



# ANNEX

## Results framework



WHAT WE WANT TO ACHIEVE?	WHAT WILL WE DO (AND HAVE DONE) TO ACHIEVE OUR GOALS?	HOW WILL WE FOLLOW UP AND MEASURE RESULTS?
<b>Impact level (objective within our sphere of strategic interest)</b>		
Our long-term aim (and guiding star) with the programme is contributing to free, trustworthy, independent, and inclusive professional journalism in Georgia	This objective is clearly outside the sphere of influence of the ITP. However, the idea is that the programme can lead to results and conditions which contribute to the overall strategic objective with this intervention.	N/A
<b>Outcomes (objectives within our sphere of influence)</b>		
<b>Outcome 1:</b> Individuals and organisations participating in the programme derive benefits and utilise international and national networks within the realm of media’s regulatory and self-regulatory framework.	<p>These networks encompass national connections in Georgia, collaborations with key actors in Sweden (as EU member state), engagement with relevant European institutions.</p> <p>We will promote participants’ collaboration in national-level teams to establish effective cooperation outside the own organisation</p> <p>That we been able to recruit variety of stakeholders who have the authority, willingness, capability, resources, and position required to contribute to the change.</p>	<p>This will be accomplished by assessing to what extent (if and how) the new networks with key institutions will continue to benefit participating organisations in the future. Additionally, we will consider the opinion and assessment of the Swedish Embassy regarding the programme’s potential as a platform for further development.</p>
<b>Outcome 2:</b> Increased knowledge and capacity to initiate and implement structured, long-term transformational work within their respective organisations.	<p>Strategic communication and advocacy will be important aspects to strengthen participants’ capabilities to drive transformational projects and, thereby, bring about necessary institutional-level change.</p>	<p>The characteristics and quality of the change initiatives that emerge from the programme will be the primary evidence of success in this regard.</p>
<b>Outcome 3:</b> That participants individually and together as a team, through a multi stakeholders/collaborative process, generate and develop ideas, and action points which will align with the recommendations put forth by the European Commission on Georgia’s European Union candidacy	<p>We will establish and promote networks among participants that can continue to develop and thrive even after the programme concludes. However, this ultimately in the hands of the participants</p> <p>Through our pedagogical methods, we stimulate communication and collaboration, even among parties who are initially apart from each other in terms of organisational structure, ideology, and substantive issues.</p>	<p>The quality and vitality of the concrete ideas and actions proposed will be the primary means of assessing this outcome</p>
<b>Outputs (objectives within our sphere of control)</b>		
<b>Output 1:</b> Improve the understanding of recent/proposed legislation in the EU to promote a better implementation in the respective country: AVMS Directive, Copyright Directive, EMFA, DSA, Political Advertising Regulation, Code of Practice on Disinformation.	<p>This also includes a better understanding of applicable freedom of expression standards adopted by the Council of Europe and the case law of the European Court of Human Rights.</p> <p>In dialogue with the participants are currently elaborating a webinar series where these issues will be covered.</p> <p>World leading experts will provide lectures and advice and public agencies (e.g. MPTR and EU institutions) will provide their practical experiences implementing the new legalisation</p>	<p>The assessment will basically focus on to which extent we have achieved will basically be based on surveys and self-assessments.</p>

<p><b>Output 2:</b> Participants gain an understanding of the intersection between media, freedom of expression, human rights including gender equality, and democracy.</p>	<p>Our reference book is the main point of departure for these discussions. There will be online and offline discussions on media policies, various journalistic domains and functioning of self-regulatory institutions and mechanisms.</p>	<p>We will mainly make use of surveys when we are starting the training followed by a similar self-assessment after the training,</p>
<p><b>Output 3:</b> Participants have access to expanded international and national networks as support for effective work with regulatory and self-regulatory frameworks.</p>	<p>The participants will both during the study visit in Sweden and Brussels</p>	<p>Our assessment will mainly be based on the analysis from the participants themselves.</p>
<p><b>Output 4:</b> Participants have a better understanding of the various parts of the self-regulatory framework and explore different areas and methods of applying this framework.</p>	<p>Our main vehicle of working with this output are the webinar series as well as carefully prepared study visits to relevant institutions.</p>	<p>This will be assessed through self-assessments and surveys.</p>
<p><b>Output 5:</b> Participants have a higher degree of awareness of digital security threats, including of gendered nature, and safety for independent media actors.</p>	<p>This will mainly be covered by literature, discussion webinars and seminars in Georgia</p>	<p>This will be based on self-assessment through surveys</p>
<p><b>Output 6:</b> Participants have increased knowledge of experiences, methods, and tools, as well as strengthened self-confidence to conduct structured, long-term change work and dissemination of knowledge and experiences obtained through the programme.</p>	<p>The change initiative is our main pedagogical tool where thematic related issues are transformed into concrete actions.</p>	<p>The relevance and the technical quality of the change project will be assessed.</p>

# ANNEX ②

## List of participating organisations



The names and gender of participants are not provided for personal data protection but can be shared confidentially upon request.

ORGANISATION	NUMBER OF PARTICIPANTS
Chai Khana	1
ComCom	3
Community Radio Marneuli	1
Georgian Democracy Initiative (GDI)	1
Georgian Media Group	1
Georgian Public Broadcaster	1
iFact	1
Journalism Resource Center	1
Media Development Foundation	2
NEO TV	1
NGO Open Borders, Jnews	1
On.ge	1
Project 64, Mediachecker	1
Sova News	1
The Georgian Charter of Journalistic Ethics	2
TOK TV	1
<b>TOTAL</b>	<b>20</b>

# ANNEX **3**

## Phase 2, Study visit to Sweden



Week 1	Monday Nov 6	Tuesday Nov 7	Wednesday Nov 8	Thursday Nov 9	Friday Nov 10	Saturday Nov 11	Sunday Nov 12
	Stockholm	Stockholm	Stockholm	Stockholm	Stockholm	Stockholm	Stockholm
08:30-09:00	<b>Welcome &amp; Intro to the programme for the week and practical details.</b>	<i>Reflection from yesterday</i>	<i>Reflections and preparation for the day</i>	<b>Visit to “Schibsted” media house and the largest newspaper in Sweden/<a href="#">Aftonbladet</a></b>  <b>Adaption to EU regulations</b> Petra Wikström, Director Public Polic, Schibsted  <b>and self-regulation from editor perspective</b>  Martin Schori, Deputy Editor-in-Chief & Deputy Publisher, Aftonbladet	<i>Reflection from yesterday</i>		Free day until departure
9:00-10:00	<b>Swedish Media Landscape: regulatory and self-regulatory systems/Peter Sommerstein, Media Expert</b>	<b>The Swedish Press and Broadcasting Authority/</b> Maria Bergerlind Dierauer, Head of Communications Department + colleagues					
10:00-10:30	<b>Coffee break</b>  <b>Swedish media landscape and connection to</b>	<b><i>Institutional setting</i></b> <b><i>Content Regulation</i></b> <b><i>Audio-visual Media Services</i></b> <b><i>New EU regulations</i></b>	<b>Work in groups on group assignments</b>  <b>“Tidningsutgivarna” <a href="#">The Swedish</a></b>		<b>Gender, regulation and self-regulation/Agneta Söderberg Jacobson Senior Adviser, Gender and HR Expert</b>		



13:30-16:00	<b>Freedom of media and freedom of expression in Sweden including challenges ahead! (historical, legal and practical/journalistic)/Dag Wetterberg, Media Lawyer Anette Novak, Media Strategist</b>	<b>PUBLIC SERVICE</b>  <u>Swedish Radio/</u> Sofia Taavitsaainen, public relations  <b>Understanding of public service mandate and role and how it is affected by EU regulations.</b>	<b>Work in groups</b>	<b>The voice of people</b>	<b>Summing up learnings and take aways.</b>  David Isaksson, Media Expert, Editor-in-Chief/ Global Bar Magazine.  <b>Danish model/Gohar Khodjayan</b>	<b>Sightseeing Stockholm (Organised)</b> Marco Giertz, Guide, Founder at "Stockholm Discovery".	
	<b>Coffee Break</b>				<b>Coffee break</b>		
	<b>Reflections</b>				<b>Reflections – how to be used in the transformation process.</b>		
15:00-15:15							
16:00-17:00							
							<b>Departure to Uppsala by bus</b>
19:00	<b>Welcome dinner</b>	<i>Individual dinner</i>	<i>Individual dinner</i>	<b>Mingle at NIRAS&amp;Dinner</b>	<i>Individual dinner</i>	<i>Individual dinner</i>	<b>Dinner</b>

# ANNEX **4**

## Phase 4, Study visit to Brussels



<b>Week 2</b>	<b>Monday Nov 13</b>	<b>Tuesday Nov 14</b>	<b>Wednesday Nov 15</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Sunday</b>
	<b>Uppsala</b>	<b>Uppsala</b>	<b>Uppsala</b>				
<b>8:30-12:00</b>	Intro and framing the week  Workshop: How to make change happen and team building  Work in groups/ Joakim Anger	Continued discussions and dialogue between the teams and preparations according to template.	Presentations of tentative change initiatives and evaluation  Concluding remarks  Evaluation				
<b>12:30-13:30</b>	<i>Lunch</i>	<i>Lunch</i>	<i>Lunch</i>				
<b>13:30-16:30</b>  <b>14:00</b>	<i>Continued</i>  Problem analysis Introduction to stakeholder analyses  Work in project teams/Gohar Khodjayan	<i>Continued</i>	<i>Transfer to the airport</i>				
	<b>Preparation for the next day</b>	<b>Summing up</b>					
	<i>Individual dinner</i>	<b><i>Final dinner</i></b>					

Week 1	Monday April 8	Tuesday April 9	Wednesday April 10	Thursday April 11	Friday April 12	Saturday April 13	Sunday April 14
	Brussels	Brussels	Brussels	Brussels	Brussels	Brussels	Brussels
08:30-09:00	<b>Welcome &amp; Intro to the programme for the week and practical details</b>  <b>Presentation of the status of the projects</b>  Address : Marriott Hotel Grand Place Rue A. Orts 3-7, 1000 Brussels	<b>09:30-10: 30 META</b> Address : Boulevard du Régent, 35 1000 Bruxelles  <b>(options:</b> <b>a: introduction</b> <b>b: broader presentation upon NDA)</b>  <b>10 min walk</b> <b>11:30-13:00 Karim Ibourki, President of the Conseil Supérieur de l'Audiovisuel (CSA) and Vice-President of the European Regulators Group for Audiovisual Media Services (ERGA)</b> Address: Rue Royale, 89 1000 Bruxelles	<b>10:00-14:00 Reflections including lunch. Workshops a session on EU legislation, discussion of main issues (AVMSD, EMFA, DSA, AI Act)/ Joan</b>  <i>NIRAS Office</i> Address: Avenue de Broqueville 40 1200 Woluwé-Saint-Lambert	<b>11:00 CDT Rue d'Arlon</b>  <b>Center for Democracy and Technology</b>  <b>Asha Allen</b> <b>Director for Europe, Online Expression &amp; Civic Space</b>  <b>"EU legislative changes in platform regulation and the role of civil society"</b> Address: Rue d'Arlon, 25 1050 Bruxelles	<b>10:00 EEAS</b>	<b>Sightseeing Brussels / Day OFF</b>	<b>DEPARTURE</b>
9:00-12:30							

12:30-13:30	Joint Lunch	Joint Lunch	Joint Lunch	Individual Lunch	Individual lunch	Individual Lunch	Individual lunch
14:30-16:00	<p><b>14:30-16:00</b>  <b>Muriel Hanot,</b>  <b>Secretary</b>  <b>General of the</b>  <b>Conseil de</b>  <b>Déontologie</b>  <b>Journalistique</b>  <b>(CDJ)</b></p> <p>Address: Rue de la Loi, 155 /103  1040 Bruxelles</p>	<p><b>14:00-16:00 Georgios Terzis &amp; Trisha Meyer, EDMO hubs and case study of EDMO hub BELUX</b></p> <p>Address: VUB - Boulevard de la Plaine, 1050 Ixelles</p> <p><b>16:30: Google – DSA compliance efforts</b>  Address:Google Park View Brussels, Chaussée d'Etterbeek 180  1040 Etterbeek</p>	<p><i>15:00 - Caroline de Cock - Lobbying and EU integration. The cases of DSA, AVMSD, EMFA and others. -</i></p> <p><b><i>We can stay longer at NIRAS?</i></b></p>	<p><i>We need to be there 1 hour prior to the meeting! 15:30</i></p> <p><b>16:30-17:30</b>  <b>Pierfrancesco Lo Sasso, European Commission - DG Connect</b>  Address : Rue de la Loi, L-51  1000 Bruxelles</p>	<p><b>15:00-17:00</b>  <b>Reflections</b>  <b>Recap with experts</b></p> <p>NIRAS office  Address : Avenue de Broqueville 40  1200 Woluwé-Saint-Lambert</p>		
19:00	<b>Welcome dinner</b>	<b>Individual dinner</b>	<b>Individual dinner</b>	<b>Individual dinner</b>	<b>18:00 Farewell dinner</b>	<b>Individual dinner</b>	<b>Individual dinner</b>

# ANNEX 5

## Survey Questions



- 1) Select your gender
  - a) Female
  - b) Male
  - c) I do not want to specify
- 2) In what type of organisation/institution do you work?
  - a) Government/Parliament/ Or other state agency
  - b) Media sector
  - c) Academic/research
  - d) NGO/CSO
  - e) Media influencer/citizen
  - f) Other
- 3) Are you in contact with any of the participants you met during the ITP Media programme?
  - 4) Within your country
    - i) Yes
    - ii) No
  - 5) In other countries
    - i) Yes
    - ii) No
  - 6) If yes (on Q3), how often are you currently in contact with other participants?
    - 7) Within your country
      - i) At least once a year
      - ii) At least once every 6 months
      - iii) At least once every 3 months
      - iv) At least once a week
    - 8) In other countries
      - i) At least once a year
      - ii) At least once every 6 months
      - iii) At least once every 3 months
      - iv) At least once a week
  - 9) Write three words that come to your mind summarizing the ITP experience
  - 10) To what extent did the programme meet your expectations?
    - a) Not at all
    - b) To a small extent
    - c) To some extent
    - d) To a large extent
  - 11) To what extent did you have an understanding towards media self-regulation as a method to increase media freedom before you attended the ITP Media?
    - a) Not at all
    - b) To a small extent
    - c) To some extent
    - d) To a large extent
- 12) What was your opinion towards media self-regulation as a method to increase media freedom before you attended the ITP Media?
  - a) Not preferable
  - b) Less preferable
  - c) Preferable
  - d) Highly preferable
  - e) Neutral
- 13) To what extent do you have an understanding towards media self-regulation as a method to increase media freedom after you attended the ITP Media?
  - a) Not at all
  - b) to a small extent
  - c) To some extent
  - d) To a large extent
- 14) What is your opinion towards media self-regulation as a method to increase media freedom after you attended the ITP Media?
  - a) Not preferable
  - b) Less preferable
  - c) Preferable
  - d) Highly preferable
  - e) Neutral
- 15) Did you include any gender equality and/or social inclusion aspects in the development of your change initiatives?
  - a) Yes
  - b) No
- 16) If you answered Yes, please specify: did you include any gender equality and/or social inclusion aspects in the development of your change initiatives?
- 17) Did you include any gender equality aspect in the development of your change initiatives?
  - i) Yes, in the problem analysis
  - ii) Yes, as a part of the change initiatives
  - iii) Yes, as a core element in the change initiatives
- 18) Did you include any social inclusion aspect in the development of your change initiatives?
  - i) Yes, in the problem analysis
  - ii) Yes, as a part of the change initiatives
  - iii) Yes, as a core element in the change initiatives

- 19) To what extent does the ITP Media serve as a platform for dialogue between your home organisation and other key stakeholders for discussion about media regulation and self-regulation?
  - a) Not at all
  - b) To a small extent
  - c) To some extent
  - d) To a large extent
- 20) Please make a self assessment of the competence development within the following fields of learning:
  - 21) To what extent have you increased your knowledge on EU legislation (DSA; DMA; AVMS; EMFA etc) thanks to ITP?
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 22) To what extent have the programme increased your understanding what Georgia as country need to do in order to live up the EU standards within the field of regulation of media.
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 23) To what extent have your participation in the programme gained your understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy.
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 24) To what extent have the participation in the programme increased your NATIONAL network as support for effective work with regulatory and self regulatory framework?
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 25) To what extent have the participation in the programme increased your INTERNATIONAL network as support for effective work with regulatory and self regulatory framework?
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 26) To what extent have your knowledge of self regulation as method to protect freedom of expression increased thanks to the programme?
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 27) To what extent have your participation increased your knowledge and skills making use of methods and tools for designing and implementing change projects?
    - i) Not at all
    - ii) To a small extent
    - iii) To some extent
    - iv) To a large extent
  - 28) Please provide examples of your competence development within the following fields of learning
  - 29) To what extent have you increased your knowledge on EU legislation (DSA; DMA; AVMS; EMFA etc) thanks to ITP?
  - 30) To what extent have the programme increased your understanding what Georgia as country need to do in order to live up the EU standards within the field of regulation of media.
  - 31) To what extent have your participation in the programme gained your understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy.
  - 32) To what extent have the participation in the programme increased your NATIONAL network as support for effective work with regulatory and self regulatory framework?
  - 33) To what extent have the participation in the programme increased your INTERNATIONAL network as support for effective work with regulatory and self regulatory framework?
  - 34) To what extent have your knowledge of self regulation as method to protect freedom of expression increased thanks to the programme?

- 35) To what extent have your participation increased your knowledge and skills making use of methods and tools for designing and implementing change projects?
- 36) To what extent do you USE the knowledge, competencies, and tools acquired during the ITP Media?
- 37) To what extent do you make USE of the knowledge on EU legislation (DSA; DMA; AVMS; EMFA etc) that you have gained from the programme?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 38) To what extent do you USE the tools related to the change project initiative?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 39) To what extent has ITP led to changes in the organisation where you work?
- 40) To what extent have you shared any information, practice and/or experience from your ITP participation with the following? (management of your organisation), your colleagues in the organisation, your local partners or networks. Please specify in the comment below.  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 41) To what extent are your new competences beneficial for your organisation?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 42) Do you feel supported and motivated within your organisation to use the new knowledge/skills you've learned?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 43) Reflecting on the entire ITP experience, were you in need of any additional support to help you use what you have learned?  
 a) Additional education (please specify what exactly in the comment below)  
 b) Consultant support to assess the opportunities for introducing changes based on the training  
 c) Access to funds to support the activities related to training topic  
 d) No need for support  
 e) Other (specify)
- 44) Do you consider that the ITP Media has contributed to any concrete change in your organisation?  
 a) Yes  
 b) No
- 45) In your opinion, what is the most significant result that happened thanks to the ITP? (whether direct and indirect effect)
- 46) Please describe HOW the participation in the ITP contributed to the result you mentioned in the previous question
- 47) To what extent have you been able to implement the change initiatives driven within ITP?
- 48) To what extent was/is it feasible apply the change initiative within your organisation?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 49) To what extent was/is it feasible to apply the change initiative outside your organisation?  
 i) Not at all  
 ii) To a small extent  
 iii) To some extent  
 iv) To a large extent
- 50) Have your change initiatives faced any key challenges?  
 a) Yes  
 b) No
- 51) If you answered yes to previous question, which among the options below would you consider to be the biggest challenge?  
 a) Resistance from the political establishment  
 b) Resistance from journalists and media houses  
 c) Resistance from media professional and associations bodies

- d) Lack of ownership and support from stakeholders outside your organisation
  - e) Lack of ownership and support from stakeholders inside your organisation
  - f) None of the above
- 52) To what extent do you think AI (Artificial Intelligence) has an impact on self/co/statutory regulation?
- a) Not at all
  - b) To a small extent
  - c) To some extent
  - d) To a large extent
- 53) Was your ITP experience different from other training programmes you have attended?
- a) Yes
  - b) No
  - c) I haven't attended other training programmes
- 54) In your opinion, what are the key factors that could make the results of the programme sustainable?
- 55) To what extent has the support provided by your National Facilitator in the programme been useful?
- a) Not at all
  - b) To a small extent
  - c) To some extent
  - d) To a large extent
- 56) What are your key recommendations to the management to make the ITP more effective? (if Sweden decides to finance similar programmes in the future). Please write in bullet points.
- 57) What are your key recommendations for the Swedish Embassy to support free and independent media in Georgia the coming years?
- 58) Do you have any final comments or suggestions you would like to share about the programme?

# ANNEX

## Survey results after study trip in Sweden (November 2023)

19 participants filled out the survey, among which 3 represent the government, 10 work in Media and 6 work in NGOs. All respondents believed that the study trip met their expectations either to a full extent (14 out of 19), moderate extent (3 out of 19) or even exceeded expectations (2 out of 19).

The majority of the respondents believed that the study trip has increased their knowledge and capacity in terms of increased understanding of the new EU regulation directives and how they could be implemented in a Georgian context (18 out of 18); increased understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy (17 out of 18); improved national networks (15 out of 17); increased awareness of the various parts of the self-regulatory framework (17 out of 18); as well as increased knowledge and capacity to initiate a structured, long term transformation work within and outside the respective organisations (17 out of 18).

Three sessions were regarded as especially relevant for the respondents – Swedish media landscape and Swedish Values (Peter Sommerstien), Freedom of Media and freedom of expression (Anette Novak Dag Wetterlind) and Summing up learning (project team). There were slightly more mixed results regarding relevance of other sessions (including the Swedish Press and Broadcasting Authority (The Swedish regulator) and Gender, regulation and self-regulation), however overall the on average, respondents found the sessions relevant or highly relevant in 90% of cases.

The absolute majority of respondents (18 out of 19) considered study visits during the trip in Sweden to be relevant for their change initiatives. The absolute majority of respondents believed that the study visits were relevant or highly relevant to them, including the following: Swedish Public Service (Swedish Radio) (18 out of 19), The Swedish Media Publisher Association (TU) (19 out of 19), Shibsted and Aftonbladet (19 out of 19) and The Committee on Constitution at Swedish Parliament (19 out of 19).

In addition to the content of the programme, the majority of respondents believed after the study visit the programme has provided them with a platform for inspiration, learning and collaboration, as well as increased team-work and commitment to work together. Finally, all respondents believed that it was likely or very likely that they would have an opportunity to apply the newly acquired knowledge and experience from the visit to Brussels in their present employment.

# ANNEX

## Survey results after study trip in Brussels (April 2024)



16 participants filled out the survey, among them 3 working in government, 7 in Media, 5 in NGOs and 1 both in Media and NGO. All respondents believed that the study trip met their expectations either to a full extent (13 out of 16), moderate extent (2 out of 16) or even exceeded expectations (1 out of 16). The technical level of the programme was assessed as mostly not too difficult but just right. Quote: “Technical level of the programme was just right. Not very complicated for non-lawyers and not very basic for lawyers and professionals”.

Most respondents thought that the study trip has increased their knowledge in various fields including understanding of the new EU regulation directives and how they could be implemented in a Georgian context (15 out of 16), understanding of the intersection between media, freedom of expression, human rights including gender equality and democracy (13 out of 16), improved national networks (13 out of 16), awareness of the various parts of the self-regulatory framework (13 out of 16) as well as knowledge and capacity to initiate a structured, long term transformation work within and outside the respective organisations (14 out of 16). The respondents did not identify any other topics that were not covered by the programme.

Some sessions were regarded as much more relevant than the others. The most relevant sessions according to respondents were Lobbying and EU integration (Caroline de Cock), STRATCOM EU (external services), workshop on AVMSD, EMFA, DSA; AI Act (Joan Barata), Conseil de Déontologie Journalistique (Muriel Hanot). In case of some sessions the responses were more mixed, however still mostly positive (this includes META, CSA and ERGA, EDMO and research, Google on DSA compliance, EU commission-DG connect and Center for Democracy and Technology). On average, respondents found the sessions relevant or highly relevant in 93% of cases.

The respondents named a number of topics where their knowledge has particularly increased, including importance of trust between stakeholders/institutions, EU law-making process and their work against disinformation, ways to eliminate the language of violence, using the online sphere against disinformation, regulation/self-regulation of media in EU countries, hate speech as a part of the law, AVMSD, EMFA, DSA, how CSOs advocate before EU institutions, how Meta and Google operate within the framework of DSA, GDPR etc.

In addition to the content of the programme, the majority of respondents believe that the study visit also enabled for increased team-work and commitment to work together, and the programme was seen as a platform for inspiration, learning and collaboration. Finally, all respondents believed that it was likely or very likely that they would have an opportunity to apply the newly acquired knowledge and experience from the visit to Brussels in their present employment.



