



Transparency and AI Readiness of Western Balkan Public Broadcasters: A Regional Assessment

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Executive Summary

Across the Western Balkans, public service broadcasters stand at a crossroads. While their mission remains unchanged, to inform, educate, and serve the public interest, the environment in which they operate has transformed dramatically. Digital disruption, the collapse of many local media outlets, political pressures, and shrinking audiences have already tested the resilience of these institutions.

But the emergence of artificial intelligence introduces an entirely new layer of complexity. AI is re-shaping global journalism with a speed that outpaces institutional adaptation, raising serious questions about editorial integrity, transparency, and accountability.

This report provides the first regional assessment that examines how prepared Western Balkan public broadcasters are for this new technological reality. The two criteria, governance transparency and digital/AI readiness, are interdependent.

Transparency provides the fundamental trust infrastructure without which new technological standards cannot operate meaningfully. In this rapidly transforming media environment, both traditional and emerging criteria must be assessed together.

The analysis is built around a structured 100-point scoring model, equally divided between two pillars:

- ✔ Transparency (50 points)-measuring the visibility, accessibility, and relevance of key governance documents.
- ✔ Digital & AI Readiness (50 points)-measuring whether ethical frameworks reflect the realities of digital journalism, social media, technological risks, and the growing use of AI tools.

The assessment covers the seven main public service broadcasters in the region: MRTV (North Macedonia), RTS (Serbia), RTCG (Montenegro), BHRT (Bosnia and Herzegovina), RTK (Kosovo), RTSH (Albania), and HRT (Croatia). Although Croatia is not always formally grouped within the Western Balkans in political or institutional terms, it remains an essential part of the regional public media landscape. Croatia's public broadcaster, HRT, operates within comparable historical, structural, and editorial conditions and faces similar challenges around transparency, digital transformation, and AI adoption. Including Croatia ensures a more complete regional comparison and strengthens the analytical value of this publication.

The findings reveal a region that is still in transition, aware of the changes, but not fully prepared for them. Most broadcasters possess a Code of Ethics, but the level of transparency varies widely. Some codes are updated and easy to find; others exist only in PDF form buried on deep subpages, or are outdated by nearly a decade. Several broadcasters also publish important transparency documents such as statutes or editorial guidelines. Complaints procedures are inconsistently visible or incomplete.

The second pillar, digital and AI readiness, exposes an even wider gap. While nearly all broadcasters acknowledge digital journalism and social media in some form, very few mention AI, algorithms, or synthetic media explicitly.

Strong, detailed rules on the ethical use of AI remain largely absent. Most codes also lack clear safeguards against technologically manipulated content, even though such manipulation is now more accessible than ever.

The overall picture is clear: public broadcasters in the Western Balkans are moving forward, but not fast enough to match the pace of technological change. Some institutions are taking serious steps toward modernization, while others remain anchored in frameworks written for a pre-AI era.

This regional assessment does not aim to criticize but to provide a constructive, evidence-based foundation for progress. By highlighting strengths and identifying gaps, the goal is to support public broadcasters, regulators, civil society organizations, and policymakers in strengthening ethical governance, improving transparency, and building AI-aware editorial standards.

As artificial intelligence rapidly becomes part of news production, verification, and distribution, the region's public service media must ensure that technological adoption does not outpace ethical responsibility. The future credibility of public service journalism depends on it.



1 Introduction

We live in a time when technology is reshaping the media landscape more rapidly than ever before. The Western Balkans are no exception to this transformation. Over the past two decades, digitalization, the rise of social media, and the dominance of mobile phones have fundamentally changed how journalism is produced, distributed, and consumed. Yet none of these shifts has been as radical, or as far-reaching, as the emergence of artificial intelligence (AI).

If media outlets in the Balkans reacted slowly to earlier technological disruptions, and many disappeared in the process, the consequences were visible and long-lasting. Entire communities saw their last local newsroom close, giving rise to what are now widely referred to as *media deserts*: regions where citizens no longer have access to any local, independent source of news. This decline did not happen overnight, it was the cumulative result of political and financial pressures, digital disruption, unpreparedness, and the inability of many outlets to adapt to new production and distribution models.

Today, the challenge facing the region is even more complex. Artificial intelligence is developing at a pace that far exceeds the speed at which ethical standards, editorial safeguards, and governance frameworks are being updated. The gap between rapid technological innovation and slow institutional adaptation is widening, raising urgent questions about accountability, transparency, and editorial integrity, especially within public service broadcasters, who carry a legal and moral responsibility to uphold the highest professional standards.

It is precisely this concern that motivated NarativAI to work on this regional assessment of the transparency and AI readiness of public service broadcasters in the Western Balkans.

By examining how these institutions publish, update, and modernize their ethical and editorial frameworks, this research seeks to understand whether they are prepared for an AI-driven information environment. The study evaluates both traditional measures of openness, such as the accessibility of Codes of Ethics and transparency documents, and the emerging standards required for responsible AI use, including guidelines on digital journalism, social media, algorithmic tools, and technological manipulation.

Through a structured 100-point scoring model, divided equally between transparency (50 points) and digital/AI readiness (50 points), this analysis provides the first comparative benchmarking of public service broadcasters in the region.

The results highlight both progress and persistent gaps, offering insights into where improvement is needed and which institutions have taken meaningful steps toward ethical modernization.

As AI becomes increasingly embedded in media production, verification, and editorial workflows, the readiness of public broadcasters to adopt, regulate, and explain these technologies will shape public trust for years to come. This assessment aims to support that ongoing transition by identifying strengths, weaknesses, and opportunities for strengthening ethical, transparent, and future-oriented public service media in the Western Balkans.



2

Why We Focused on Public Service Broadcasters

We decided to analyze public service broadcasters because they are funded directly by the people. Taxpayers support these institutions, so they should know how transparent they are, what ethical standards they follow, and how prepared they are for new challenges like AI.

In most Balkan countries, public broadcasters are also the largest media organizations with the biggest newsrooms, the most employees, and in some cases even with the widest reach. What they do sets the tone for the entire media sector. If public broadcasters strengthen their ethics, transparency, or digital practices, the whole industry feels the impact.

At a time when misinformation, synthetic content, and AI tools are changing journalism faster than ever, it is crucial that publicly funded media lead by example. This research aims to show where they stand today, and what needs to change, so they can continue to serve the public with trust and responsibility.

While this research did not assess how public service broadcasters in the Western Balkans currently use AI in their daily work, it is important to understand the global context in which they operate. Around the world, newsrooms are already experimenting with, and in some cases heavily relying on AI tools. These tools are no longer limited to simple tasks. They now support research, help with editing and summarizing, generate short-form content, analyze documents, or even recreate stories in different formats. In many countries, AI is built directly into newsroom workflows.

Examples from the 2025 Reuters Digital News Report show how far this trend has gone.¹

Major news organizations are using AI to summarize articles, detect patterns, rewrite stories for different platforms, or scan large public documents for newsworthy signals. Some have gone even further, testing AI-generated presenters or automating entire formats. In Europe, Australia, Asia, and Latin America, media groups are adopting AI tools not just to save time, but to cut costs, reach new audiences, and experiment with new ways of producing and distributing news.

At the same time, there is a growing push to set ethical boundaries. Press councils, unions, and major publishers are now drafting rules for how AI should be used, insisting that humans must stay in control, and that AI-generated content must be clearly labeled. Some newsrooms have already published AI policies; others are negotiating licensing deals with AI companies or going to court to protect their journalism from being used without permission.²

All of this shows one thing clearly: AI is no longer a distant future, it is already reshaping newsrooms worldwide.

This is why the ethical preparedness of public service broadcasters matters so much. Even if they are not using AI at an organizational level, it is very likely that journalists and editors are already using AI tools individually in their daily work. And this can be an even bigger problem. When AI enters the newsroom quietly, without rules, without oversight, and without clear standards, the risk of mistakes, misinformation, or ethical breaches grows even more.

Without updated guidelines, transparency rules, and modern standards, public broadcasters risk losing control over how AI shapes their journalism, and losing public trust at a moment when trust is already fragile.

1 Reuters Institute for the Study of Journalism (2025). Digital News Report 2025. Available at: <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2025>

2 Principles for Using Generative A.I. in The Times's Newsroom. Available at: <https://www.nytc.com/press/principles-for-using-generative-a%E2%80%A4i%E2%80%A4-in-the-timess-newsroom/>



3 Methodology

This regional assessment is based on a structured and comparative methodology designed to evaluate two essential dimensions of public service broadcasters in the Western Balkans: transparency and AI readiness. The approach combines document analysis, digital footprint review, and a standardized scoring framework that enables consistent comparison across seven national broadcasters.

3.1. Scope of the Study

The analysis covers the seven public service broadcasters in the region: MRTV (North Macedonia), RTS (Serbia), RTCG (Montenegro), BHRT (Bosnia and Herzegovina), RTK (Kosovo), RTSH (Albania), and HRT (Croatia). For the purpose of this assessment, the term “Western Balkans” is used in a broader media-analysis context. While Croatia is an EU member state, its public service broadcaster shares many structural, editorial, and technological characteristics with broadcasters in the surrounding region. Including Croatia enables a more meaningful benchmarking of transparency standards, ethical frameworks, and AI readiness across neighboring public broadcasters. This approach reflects media realities rather than strict political classifications. Only publicly accessible information was used for this assessment. This includes:

Codes of Ethics	Web-based policies
Statutes and editorial guidelines	Publicly available complaints procedures
Governance and transparency documents	Online archives and digital platforms of the broadcasters

3.2. Scoring Framework

The scoring system consists of 10 questions, each worth 0, 5, or 10 points, for a total of 100 points.

The questions are divided into two clusters:

I. TRANSPARENCY (50 POINTS) Assesses whether broadcasters:	II. DIGITAL & AI READINESS (50 POINTS) Evaluates whether broadcasters:
have a Code of Ethics	include digital journalism guidelines
publish it online	regulate social media use
keep it updated	mention AI or algorithms
offer additional transparency documents	provide rules for AI use
provide a clear audience complaints mechanism	address technological manipulation risks

This model allows equal weighting between traditional governance standards and the emerging challenges of the AI era.

3.3. Data Collection Process

The data collection consisted of three steps:

Systematic website review	Every broadcaster's website was analyzed to identify: <ul style="list-style-type: none"> • availability and placement of ethical documents • ease of navigation • publication of transparency materials • visibility of complaint mechanisms • presence of digital and AI-related guidelines
Document content analysis	Relevant documents were examined to determine: <ul style="list-style-type: none"> • clarity of ethical standards • recency and update cycles • inclusion of digital/online journalism rules • presence of AI-related policies or protections • references to synthetic media, manipulation, or technological distortion

Scoring and verification

Each broadcaster was scored independently using the 10-question model. Scores were assigned only on the basis of:

- information found on official websites
- publicly posted documents
- linked PDFs and policy materials
- When information could not be found, the score reflected absence or lack of transparency, not assumptions.

3.4. Limitations

This study reflects publicly accessible data at the time of analysis.

The following limitations apply:

- If a document exists but is not published online, it is scored as non-transparent.
- Broadcasters continuously update websites, so availability may change over time.
- AI policies are still emerging globally; results reflect current adoption levels, not long-term capacity.

Despite these limitations, the methodology provides a fair, consistent, and evidence-based regional comparison.

3.5. Purpose

The aim of this methodology is not to rank broadcasters competitively, but to:

- identify strengths and gaps
- encourage transparency and ethical modernization
- support responsible AI integration
- provide a baseline for future updates

This framework can be repeated annually or adapted to track how public service media evolve in the AI era.



4

AI Use and Transparency Statement

In line with NarativAI’s commitment to ethical and transparent use of artificial intelligence, we want to clarify how AI tools were used in the creation of this publication. The research, analysis, scoring, and final conclusions were carried out by the author, with expert reviewers providing independent evaluation and feedback.

AI tools were used **strictly as supportive instruments** for:

- translation of documents and source materials,
- text structuring and formatting,
- improving readability and consistency,
- fact-checking publicly available data, and
- preparing visual elements such as tables and summaries.

Every analytical conclusion in this report—including verification of information and final scoring, was made solely by the NarativAI team. AI tools were not used to judge, score, evaluate, or fact-check any broadcaster. All judgments remain fully human-made and independently verified.

5

Regional Highlights

The results of this assessment show that the region is moving forward, but at an uneven and sometimes uncertain pace. All seven public service broadcasters score between 50 and 65 points out of 100, placing the Western Balkans in a zone of moderate *readiness* rather than strong preparedness or severe lag.

Table 1. Comparative Scores of Public Broadcasters

Broadcaster	Country	Transparency (Q1–Q5)	Digital & AI (Q6–Q10)	Total Score
MRTV	North Macedonia (MK)	30/50	20/50	50/100
RTS	Serbia (RS)	45/50	10/50	55/100
RTCG	Montenegro (ME)	45/50	15/50	60/100
BHRT	Bosnia & Herzegovina (BA)	45/50	20/50	65/100
RTSH	Albania (AL)	25/50	35/50	60/100
RTK	Kosovo (XK)	35/50	30/50	65/100
HRT	Croatia (HR)	15/50	35/50	50/100

The region is aware of the technological and ethical changes reshaping public service media, but adaptation remains gradual, fragmented, and inconsistent.

The highest overall performers are BHRT and RTK, each with 65 points. Their scores indicate relatively balanced progress across both transparency and digital/AI readiness.

They are followed closely by RTCG and RTSH with 60 points, broadcasters that show solid foundations but still lack more advanced standards for AI governance.

RTS, with 55 points, demonstrates solid document transparency but shows limited progress in modernizing its ethical framework for the digital and AI era. HRT at 50 points, scores lower primarily because its Ethical Code is not publicly available, despite having relatively strong internal editorial provisions.

MRTV, likewise at 50 points, remains the broadcaster most in need of comprehensive updates to its ethical documents, particularly in integrating digital and AI-related standards.

5.1. Transparency: A Regional Strength

Transparency emerges as the stronger dimension across the region. Most broadcasters have a Code of Ethics and a basic level of published documentation. However, the depth, clarity, and accessibility of these materials differ widely.

Key observations:

- Codes of Ethics exist in nearly all broadcasters, but some are difficult to find or outdated.
- Additional transparency documents (statutes, editorial guidelines, governance materials) are common but inconsistent in quality.
- Complaints procedures exist in most institutions, yet they are not always easy for audiences to find or understand.
- Website structure and navigation remain major obstacles to effective transparency.

Despite these inconsistencies, the region demonstrates foundational but incomplete transparency practices. Transparency is present, but not always treated as a core public value.

5.2. Digital & AI Readiness: The Weakest Regional Dimension

The second half of the scoring model, digital standards, social media guidelines, and AI-related ethics, reveals the largest gaps.

Common weaknesses include:

- Digital journalism guidelines are often minimal or generic.
- Social media policies rarely address modern journalistic risks or responsibilities.
- Mentions of AI, algorithms, synthetic media, or automated tools are rare or absent.
- Explicit rules for the ethical use of AI are nearly nonexistent.
- Safeguards against manipulated or synthetic content (deepfakes, altered visuals, computer-generated media) appear sporadically, without clear operational definitions.

This shows that while public broadcasters have begun adapting to digital realities, they are largely unprepared for the ethical and editorial implications of AI.

5.3. Special Mentions: Regional Patterns Worth Noting

- High transparency ≠ strong AI readiness. Even broadcasters with solid transparency frameworks lack modern digital and AI ethical standards.
- BHRT and RTK stand out as the most balanced broadcasters, though neither reaches a high-readiness profile.
- RTCG and RTSH achieve the same total score, but for different reasons: RTCG performs better in transparency, while RTSH demonstrates stronger digital and AI-related readiness. This highlights that similar totals may reflect very different internal strengths. RTS demonstrates strong traditional transparency but continues to lag behind in modernizing its ethical standards for the digital and AI era.
- HRT's score of 50 is driven primarily by its low transparency, as its Ethical Code is not publicly accessible, despite having relatively strong editorial and digital-era provisions internally.
- MRTV's total of 50 points reflects an outdated ethical framework and the absence of digital or AI-related guidelines, highlighting the need for a comprehensive update.

5.4. Overall Regional Trend

Table 2. Ranking (Highest to Lowest)

RANK	BROADCASTER	SCORE
1	BHRT	65
1	RTK	65
3	RTCG	60
3	RTSH	60
5	RTS	55
6	HRT	50
6	MRTV	50

Public service broadcasters in the Western Balkans are evolving, but not at the pace demanded by the rapidly changing technological environment. The region has taken meaningful steps in transparency and document publication, yet remains at an early stage of integrating AI-sensitive guidelines, digital ethics, and safeguards against technological manipulation.

As AI becomes intertwined with news production, verification, and editorial decision-making, these gaps signal an urgent need for modernization. The findings of this assessment are not meant as criticism but as a constructive foundation for strengthening public service media governance, ensuring that these institutions remain credible, responsible, and aligned with the realities of an AI-influenced information ecosystem.

6

Country Profiles

6.1. MRTV – North Macedonia



Transparency: 30/50
Digital & AI Readiness: 20/50

TOTAL SCORE: 50/100

MRTV formally maintains an extensive Code of Ethics, but its transparency and practical accessibility remain limited. The Code³ is published on the website, however, it can only be found through the search function, and users must already know exactly what they are looking for. This undermines the principle of public visibility.

Other governance and transparency documents are placed within the “Info” section, which functions like an unstructured blog feed rather than a proper archive. Only the newest decisions are easily visible, while locating older or specific materials is unusually difficult.

MRTV also has a dedicated “Ethics Commission” tab, but it provides only an email address and no details about procedures, decisions, or complaint handling, which leaves the accountability process opaque.

3 Ethical Code of MRT for Journalists, Creative Staff, and All Employees. Available at: https://www.mrt.com.mk/sites/default/files/Етички кодекс на МРТ_0.pdf

Content-wise, MRTV's 45-page Code of Ethics is one of the most detailed in the region, yet it has not been updated since 2017. As a result, it does not cover any of the key ethical dilemmas that emerged in the last few years, including the use of artificial intelligence, synthetic media, deepfakes, algorithmic tools, or editorial risks associated with AI-assisted production.

The Code also lacks guidance on social media use by journalists, aside from a brief remark that information from the internet must be verified and clearly identified as such. Specific terminology such as *social media*, *artificial intelligence*, *algorithms*, or *synthetic media* is entirely absent.

Despite these gaps, the Code contains provisions regarding technological manipulation of audio and video. MRTV strictly prohibits distortion of reality through special effects, computer animation, or other forms of technological processing. Reconstructed footage must be clearly labeled at both the beginning and end, and reconstruction must serve informational clarity rather than dramatization. The Code also forbids the use of music, actors, or dialogues in reconstructions unless they reflect verified events. Although these protections predate the AI era, they offer an ethical foundation for safeguarding authenticity.

However, the combination of outdated standards and poor website organization results in a broadcaster that meets only the minimum requirements for transparency while remaining insufficiently prepared for digital and AI-related challenges.

The institution would benefit greatly from updating its Code of Ethics to incorporate AI-specific principles, establishing a clear structure for publishing documents, and improving the visibility and functionality of the Ethics Commission. Strengthening social media rules, defining responsible use of AI tools, and introducing clear verification protocols for synthetic media would significantly improve editorial integrity and public trust.

Recommendations for MRTV

- Update the Code of Ethics with AI, algorithms, synthetic media, deepfake rules, and social media standards.
- Create a proper "Transparency" page with all documents clearly organized and searchable.
- Make the Code easy to find through main navigation, not only via search.
- Strengthen the Ethics Commission section by adding procedures, workflows, and published decisions.
Adopt a clear Social Media Policy for journalists and editors.
- Introduce an AI Use Policy defining allowed, restricted, and prohibited uses.
- Expand manipulation safeguards to explicitly include AI-generated and synthetic content.

- Improve document archiving so older decisions are accessible and logically structured.
- Provide clear guidance for the public on how to submit complaints and what to expect.
- Establish regular updates (every 2–3 years) to keep ethical standards current.

6.2. RTS – Serbia



RTS maintains a relatively well-organized system of published documents, and its Code of Ethics⁴ is easy to locate. By navigating RTS - Public Service (*За јавни сервис*) - Documents of the Management Board (*Документи Управног одбора*), users can access the Code within a few steps. The document is concise, eight pages long, and clearly states its adoption date: 29 December 2022. Other governance materials are also grouped in the same section and appear to be updated regularly.

However, RTS loses transparency points because its complaints mechanism is not accessible to the public. According to the available documentation, only employees, members of the Management Board, and external associates may file a formal complaint.

Complaints submitted by “unauthorized persons,” which includes the general public, are automatically dismissed. This policy sharply limits accountability and runs contrary to the principles of public service media, where audiences must have a clear and functional channel to express concerns about ethics, accuracy, and editorial conduct.

Although the Code contains a brief provision noting that rules for public appearances also apply to social networks (*društvene mreže*), this section is minimal and does not address essential elements such as verification of online sources, guidelines for journalist behavior on social platforms, or the boundaries between personal and professional presence.

Employees are instructed not to express opinions that could harm RTS’s reputation or impartiality, but no broader framework is provided. This keeps RTS aligned with traditional media standards rather than contemporary digital practice.

When it comes to AI and synthetic media, the Code contains no references to artificial intelligence, algorithms, manipulated content, or editorial safeguards against deepfakes. There are no rules gov-

⁴ Етички кодекс РТС (2022). Радио-телевизија Србије. Available at: https://www.rts.rs/upload/media/2023/5/8/16/8/883/1501266/ETICKI_KODEKS.pdf

erning the use of AI tools inside the newsroom, nor any requirement for human oversight of automated processes. These gaps position RTS well behind modern ethical standards and global trends in public service media governance.

In summary, RTS benefits from good document accessibility and a recently adopted Code of Ethics, but its restrictive complaints mechanism, minimal digital guidelines, and lack of AI-related standards highlight substantial areas for improvement. Stronger integration of digital journalism ethics, social media rules, and AI governance—along with opening the complaints system to the public—would significantly strengthen RTS’s overall readiness.

Recommendations for RTS

- Open the complaints mechanism to the public and provide clear procedures for submitting, processing, and publishing audience complaints.
- Create a dedicated “Complaints & Ethics” page outlining workflows, criteria, and contact information in a transparent and user-friendly manner.
- Expand the social media section of the Code with clearer rules on verification, personal/professional boundaries, conflicts of interest, and responsible online behavior.
- Introduce explicit guidelines on AI, algorithms, and synthetic media, including verification of manipulated or AI-generated content.
- Develop an internal AI Use Policy defining allowed, restricted, and prohibited uses of AI tools in editorial and production workflows.
- Regularly update ethical and governance documents, especially as AI and digital technologies evolve.
- Increase visibility of ethical bodies by publishing summaries or outcomes of reviewed cases, meeting notes, or annual report

6.3. RTCG – Montenegro



Transparency: 45/50
Digital & AI Readiness: 15/50

TOTAL SCORE: 60/100

RTCG has a publicly available Code of Ethics⁵, but its visibility on the website is limited. The document is accessible, yet relatively difficult to locate because it is not placed in the logical “Documents” sections. Instead, users reach it by navigating through RTCG - Council (*Savjet*) - Bulletin (*Bilten*), where the Code appears after scrolling past around twenty other documents.

5 Etički kodeks RTCG (2024). Radio Televizija Crne Gore. Available at: https://rtcg.me/upload/me-dia/2024/10/27/15/13/53/1949214/Eticki_kodeks.pdf

This structure makes the Code technically available, but poorly positioned and inconvenient, requiring persistence and prior knowledge of where to look.

In contrast, transparency is stronger in the area of complaints. The website contains a visible Ombudsman section that provides all necessary documents, instructions, and procedures for submitting a complaint. This makes the complaints mechanism one of the more accessible in the region and contributes positively to RTCG's overall transparency score.

The RTCG Code of Ethics is short and clearly structured, consisting of seven pages, with the adoption date explicitly listed as 20 November 2024. The Code extends the provisions on public appearances to include journalists' behavior on social networks, stating that the same rules apply "to public appearances and to behaviour on social media."

However, this guidance remains minimal. There are no detailed instructions for verifying digital sources, handling content from online platforms, or defining appropriate professional conduct in digital spaces. The document simply notes that employees must be aware that everything they publish will be considered part of RTCG and that they must not jeopardize the broadcaster's reputation.

Although the Code is relatively new, it contains no references to artificial intelligence, algorithms, or synthetic media. There are no ethical guidelines for AI-assisted production, automated tools, deepfakes, or manipulated visuals. The Code also lacks explicit prohibitions against the use of technical effects or digital processing that could alter or distort reality, a safeguard present in some older codes in the region.

Overall, RTCG shows a combination of strengths and gaps. It performs well in formal transparency thanks to the Ombudsman section, but its ethical framework remains incomplete, and the placement of key documents limits real accessibility.

Adding modern digital and AI-related ethical standards, along with reorganizing document visibility, would substantially improve RTCG's readiness for the evolving media environment.

Recommendations for RTCG

- Make the Code of Ethics easier to find instead of placing it deep in the "Council - Bulletin" pages.
- Create a dedicated transparency page where all key documents (Code of Ethics, Statute, decisions, policies) are organized and easily accessible.
- Expand social media guidelines with clearer rules on digital behavior, online source verification, and separation of personal and professional identities.
- Introduce AI and synthetic media standards to address deepfakes, manipulated content, and the use of AI tools in production.

- Add rules on technological manipulation to prevent distortion through digital effects, animation, or automated processing.
- Review and update the Code regularly, ensuring it reflects new ethical challenges and technological developments.

6.4. BHRT - Bosnia and Herzegovina



BHRT demonstrates one of the stronger transparency practices in the Western Balkans. Its Editorial Principles (Uređivačka načela BHRT)⁶ are publicly available and can be reached in two to three clicks, making them significantly easier to locate than those of many broadcasters in the region. The document is clearly structured, spans eight pages, and includes a visible adoption date: 30 January 2023. BHRT regularly publishes and updates its primary governance materials, which contributes to a consistently high transparency score.

However, the placement of the Editorial Principles as the final item in the 2023 document list presents a potential long-term risk. Without a dedicated and more structured “Transparency” or “Documents” section, this key document may slowly become harder to find as additional materials are added to the site. While BHRT currently performs well in document availability, its future accessibility depends on improved site organization.

BHRT’s complaints mechanism exists, but is not accompanied by a separate, audience-friendly page that explains how viewers can file a complaint, what steps the process includes, or how cases are resolved. The absence of a dedicated, public-facing explanation limits the usability of the mechanism, even though the underlying rules are in place.

The Editorial Principles offer more advanced digital journalism guidance than many of the region’s broadcasters. They explicitly require that information obtained from web portals and other digital sources be independently verified using reliable sources before publication, emphasizing credibility and accuracy in the digital environment.

The Principles also contain detailed expectations regarding personal opinions on social networks and other digital platforms. Journalists are reminded to follow professional standards, protect the integrity and reputation of BHRT, and avoid harmful or malicious comments, including interactions with “bots and trolls.” Employees are instructed that anything they publish publicly, including on social media, will be treated as part of BHRT’s broader editorial identity.

⁶ Uređivačka načela BHRT (2023). Radio Televizija Bosne i Hercegovine. Available at: <https://bhrt.ba/uploads/PDF%20dokumenti%202025/Ure%C4%91ivac%CC%8Cka%20nac%CC%8Cela%20BHRT.pdf>

Despite these strengths, the Editorial Principles do not mention artificial intelligence, algorithms, or synthetic media, nor do they offer rules for the ethical or editorial use of AI-assisted tools. The document also lacks explicit prohibitions on animation, special effects, or other forms of technical manipulation that may distort the factual representation of reality, safeguards present in some other broadcasters' codes.

Overall, BHRT stands out for its strong transparency, relatively accessible ethical framework, and meaningful rules addressing digital content and social media. However, the absence of AI-related standards and explicit protections against technologically manipulated content highlights the need for modernization. Updating the document to include emerging ethical risks would align BHRT more closely with contemporary public service media standards.

Recommendations for BHRT

- Create a dedicated transparency section to ensure long-term visibility of key documents, especially the Editorial Principles.
- Develop a clear, public-facing complaints page explaining how audiences can submit concerns and outlining the full procedure.
- Expand social media guidelines with more specific rules on journalist conduct, verification, and handling harmful online interactions.
- Introduce AI-related standards covering algorithms, synthetic media, deepfakes, and AI-assisted production tools.
- Add explicit rules against technological manipulation such as animation, digital effects, or any process that may distort reality.
- Establish regular updates of the Editorial Principles to keep pace with technological and ethical developments.

6.5. RTSH – Albania



Transparency: 25/50
Digital & AI Readiness: 35/50

TOTAL SCORE: 60/100

RTSH provides a formally well-structured “Transparency” section on its website, where key governance and legal documents are clearly listed. In principle, this includes the Code of Ethics, which should be easily accessible to the public.

However, during the research period (October–November 2025), the link to the Code of Ethics was non-functional, despite more than 20 attempts to access it. This significantly affects both transparency and practical accessibility. The Code was ultimately obtained through third-party websites that monitor media and journalism in Albania, not through the RTSH website itself.⁷

Other documents, such as statutes, financial reports, and institutional acts, are available and updated, but the absence of a functional link to the ethical code remains a major gap.

RTSH does not offer a clearly visible page dedicated to audience complaints. The Transparency section provides structured information for obtaining documents under the Law on Access to Public Information.

The RTSH Code of Ethics was adopted on 23 November 2016 and is one of the longest ethical documents in the region, spanning 55 pages. Despite its length and detail, the Code predates major technological changes and does not include references to artificial intelligence, algorithms, or synthetic media. As a result, there are no rules that govern the ethical use of AI tools in production, verification, or editorial decision-making.

However, the Code contains rigorous rules against technological manipulation, making it one of the stricter regional documents in this regard. It explicitly warns that the use of technologies capable of creating virtual realities (*realitete virtuale*) should be avoided when reporting on real events. It also states that any effects must not distort reality, and that creators must avoid techniques that could manipulate what has actually occurred. All reconstructions or simulations (*rindërtimi dhe përngjasi-mi i një ngjarjeje*) must be clearly labeled for viewers through audio or visual means. These provisions provide strong protection against misrepresentation, even though they were not written with AI in mind.

The Code includes several digital-era elements. Information obtained from non-authoritative websites or unofficial online sources must be verified through credible sources before publication. All facts must be checked before retransmitting unverified online content. In terms of social networks, employees are prohibited from expressing ideas or opinions that could damage the reputation of RTSH or conflict with its editorial policy. Staff members who are publicly known as RTSH employees must clearly indicate when their posts reflect personal opinions. While these digital elements are valuable, they remain insufficiently developed and do not replace the need for modern standards on AI, algorithms, or synthetic media verification.

RTSH's relatively high digital/AI readiness score comes primarily from its strict rules on technological manipulation and online verification, not from true AI integration. Updating the Code of Ethics and ensuring consistent website accessibility would significantly improve the broadcaster's overall performance.

7 Kodi i Etikës, Parimet Editoriale dhe Standardet Profesionale të RTSH-së [The RTSH Code of Ethics, Editorial Guidelines, and Professional Standards]. Published on Media Ownership Monitor – BIRN Albania. Available at: https://albania.mom-gmr.org/uploads/tx_lfrogmom/documents/327-2354_import.pdf

Recommendations for RTSH

- Fix the non-functional link to the Code of Ethics and ensure it is consistently accessible from the Transparency section.
- Create a dedicated audience complaints page explaining how citizens can file complaints, what the procedure is, and which body handles them.
- Update the Code of Ethics to include modern standards on artificial intelligence, algorithms, and synthetic media.
- Strengthen digital verification rules with clearer guidance on online sources, platform reliability, and digital fact-checking workflows.
- Expand social media guidelines to define expectations for professional conduct, conflicts of interest, and organizational representation online.
- Introduce an AI Use Policy detailing acceptable, restricted, and prohibited uses of AI in editorial and production contexts.

6.6. RTK – Kosovo



Transparency: 35/50
Digital & AI Readiness: 30/50

TOTAL SCORE: 65/100

RTK has one of the most accessible and clearly organized transparency structures among public broadcasters in the Western Balkans. The Code of Ethics⁸ can be located in just two to three clicks by navigating through PËR RTK-në - Standardet Profesionale, a dedicated and prominently visible section. The Code is detailed, consisting of 57 pages, and was adopted on 24 November 2015. Other institutional documents, including board decisions, statutes, and regulatory acts, are also clearly displayed and regularly updated.

RTK also provides a visible channel for public engagement through the Grupi Këshillues i Publikut, where citizens can submit feedback or contact the broadcaster directly. More importantly, the Code of Ethics explicitly establishes the role of the Ombudsman/Defender of Professional Standards and Ethical Principles (OMBUDSMANI / MBROJTËSI I STANDARDEVE PROFESIONALE DHE PARIMEVE TË ETIKËS GAZETARESKE). Unlike several broadcasters in the region, the public is formally authorized to submit complaints, suggestions, and concerns (dëgjuesit dhe shikuesit). Citizens must first contact the responsible chief editors; if dissatisfied with the response, they may escalate their complaint to the Ombudsman, who also serves as an official register for all audience submissions. This makes RTK one of the more transparent institutions regarding audience accountability.

⁸ Standardet Profesionale dhe Parimet Etike të Gazetarisë në Programet e Radiotelevizionit të Kosovës (2015). Radio Televizioni i Kosovës (RTK). Available at: https://www.rtklive.com/pages/files/standardet_profesionale.pdf

In terms of content, the Code offers detailed guidance for the digital environment. Information obtained from trustworthy websites or unauthorized online sources must be additionally verified against reliable sources before publication. Journalists are required to check all facts thoroughly before retransmitting online content. These provisions provide a solid foundation for digital verification standards.

The Code also contains specific guidance on behavior on social networks (Sjellja në rrjetet sociale). Journalists and employees are prohibited from expressing ideas or opinions that may damage RTK's reputation or undermine its editorial policy. Staff members who are publicly known as RTK employees must clearly indicate that their online posts represent personal views, ensuring a separation between institutional identity and individual expression.

Although RTK does not explicitly mention artificial intelligence, algorithms, or synthetic media, the Code includes rigorous rules against technological manipulation, which indirectly address many risks associated with AI-assisted tools. The use of special effects, including sound effects and computer-based post-production technology, must be handled with extreme care and must not distort reality. RTK is required to avoid any special effects capable of creating virtual reality (realitete virtuale) in informative programming. Program authors must not use techniques that manipulate actual events, and any reconstruction or simulation (rindërtimi dhe përngjasimi i një ngjarjeje) must be clearly labeled for the audience through audio or visual cues.

Overall, RTK stands out as a broadcaster with strong ethical safeguards, well-developed digital verification rules, and one of the most accessible complaints mechanisms in the region. The main gap is the absence of explicit AI-related standards and guidance on synthetic media, which limits the Code's relevance in today's rapidly evolving technological landscape. Nevertheless, RTK performs above the regional average and demonstrates a high level of editorial maturity, particularly in areas of transparency, accountability, and digital professionalism.

Recommendations for RTK

- Introduce explicit AI guidelines, including rules on synthetic media, automated tools, deepfakes, and algorithmic decision-making.
- Update digital verification standards to reflect current online risks, misleading platforms, and AI-generated content.
- Expand social media policies with clearer guidance on professional boundaries, misinformation risks, and platform-specific behavior.
- Modernize technological manipulation rules to explicitly include AI-assisted editing, image generation, and automated enhancement tools.
- Regularly review and update the Code of Ethics to align with international best practices and emerging technological challenges

6.7. HRT – Croatia



Transparency: 15/50
Digital & AI Readiness: 35/50

TOTAL SCORE: 50/100

HRT is unique among the analyzed broadcasters due to one defining characteristic: although it has a formal Ethical Code⁹, the document is not publicly available online. It is considered an internal document, and the public cannot access it through the HRT website or any other publicly accessible platform. During this research, the Code was obtained only through a direct request made to a responsible department within the broadcaster. This lack of public access significantly reduces HRT's transparency score and places it behind all other public broadcasters in the region in this category.

The rest of HRT's governance documents are properly published on the website in the Documents section, including statutes, rules, and institutional policies. HRT also provides a clearly visible User Ombudsman (Povjerenik za korisnike), responsible for handling user complaints and feedback. This indicates that audience-facing accountability mechanisms exist.

However, the lack of a public-facing ethical code limits the audience's ability to understand the standards by which journalists and editors are expected to operate.

One major transparency issue concerns the complaints process. The Ethics Commission (Etičko povjerenstvo) accepts submissions only from HRT employees and external associates engaged in a project. It is explicitly stated that the Commission must reject any submission from an unauthorized person, including members of the public (*"Prijavu neovlaštene osobe... Povjerenstvo je obvezno odbaciti"*). This creates a closed accountability system that excludes the audience and does not meet modern public service media standards of openness.

The Ethical Code itself was adopted on 30 September 2016 and consists of 23 pages. It contains several strong editorial and digital-era provisions. The Code applies to multimedia programs and electronic publications (elektroničkih publikacija), emphasizing that information from unofficial or unreliable sources must be fully verified and confirmed by at least one additional credible source. When information originates from other media, the original source must always be stated.

HRT provides detailed expectations for journalists' behavior on social networks. All rules applying to public appearances (javnim istupima) also apply to social media activity. Employees must avoid displaying political, ideological, or religious affiliations that could reasonably create the impression of compromised independence or impartiality.

Although the Code does not explicitly mention artificial intelligence, algorithms, or synthetic media, it contains some of the strongest regional rules against technological manipulation. It clearly prohibits

9 Etički kodeks za novinare i kreativno osoblje HRT (2016). Hrvatska radiotelevizija (HRT). Not available online; obtained directly from HRT.

the use of computer animation, image or sound processing, or other technical procedures that could conceal, distort, or alter the original content or message in informative programming.

Visual or sound effects, reconstruction, or simulation may not be used in ways that mislead the public. When reconstruction is necessary, it must be clearly marked at the beginning and end of the segment. These rules provide a solid ethical foundation against misrepresentation, even if they were not drafted with AI in mind.

Overall, HRT's internal ethical framework demonstrates strong editorial principles and solid digital safeguards. However, the lack of public access to the Code, combined with a closed complaints mechanism, significantly undermines transparency and public accountability. Updating the Code with AI-related provisions and making it publicly accessible would be essential steps toward aligning HRT with contemporary regional and international standards.

Recommendations for HRT

- Publish the Ethical Code online so that the public can see the editorial standards and expectations for journalists.
- Open the ethics complaints process to the public, allowing citizens, not only employees and collaborators, to submit concerns about potential breaches.
- Create a clear transparency page where the Ethical Code, key documents, and audience rights are all easily visible and accessible.
- Introduce specific rules on AI and synthetic media, including guidelines for the use of automated tools, deepfakes, and algorithmic decision-making.
- Strengthen digital verification standards to address modern risks such as AI-generated misinformation and unreliable online sources.
- Update the rules on technological manipulation to explicitly include AI-assisted editing, image generation, and advanced post-production techniques
- Ensure regular updates of the Ethical Code so that it keeps pace with technological and ethical developments.



7 Regional Conclusion

The assessment of public service broadcasters across the Western Balkans reveals a region in transition, caught between long-established ethical frameworks and the rapidly evolving demands of the digital and AI-driven media environment. While all broadcasters maintain some form of ethical standard, their levels of transparency, accessibility, and technological readiness vary significantly. A clear regional pattern emerges:

- Ethical codes exist everywhere, but their visibility and accessibility differ greatly.
- Transparency structures are uneven, ranging from easily navigable systems (RTK, BHRT, RTS) to incomplete or closed models (HRT).
- Digital provisions are present, but often limited to social media behavior and verification of online sources.
- AI-related standards are missing across the entire region, no broadcaster has yet adopted explicit rules addressing algorithms, synthetic media, deepfakes, or AI-assisted editorial workflows.
- Accountability mechanisms differ sharply, with some broadcasters allowing direct public complaints (RTK), while others restrict the process exclusively to employees (RTS, HRT).

Despite these differences, the regional picture shows strong foundations but insufficient modernization. Most codes were written before AI became a defining media force and as a result, they focus on traditional manipulation risks but not on machine-generated content, automated decision systems, or new forms of editorial vulnerability.

The study indicates that the Western Balkan public broadcasters are ethically structured, but not technologically aligned with the challenges of today. Transparency improves where documents are easy to access, clearly labeled, and regularly updated. It deteriorates when codes are hidden, offline, or treated as internal documents.

The overall conclusion is that public broadcasters in the Western Balkans are partially ready for the digital era but unprepared for the AI era. For public service media to maintain credibility and public trust, they must take decisive steps toward modernizing ethical frameworks, improving transparency, and integrating clear, accountable rules for the use of emerging technologies.

This report aims to support that transition, highlighting gaps, recognizing strengths, and providing a roadmap for broadcasters to evolve into fully transparent, digitally resilient, and AI-responsible public institutions.



8

Way Forward: AI, Ethics, and Public Service Media

The findings of this analysis show that Western Balkan public broadcasters must now transition from traditional frameworks toward systems capable of responding to a fast-changing digital and AI-driven environment.

For decades, their ethical frameworks have been anchored in traditional journalism values, accuracy, independence, responsibility, and protection against manipulation. These foundations remain essential, but they are no longer sufficient.

The rapid emergence of artificial intelligence, synthetic media, automated production systems, and algorithmically driven distribution channels is reshaping the media environment faster than any previous technological shift.

In this new reality, public service media cannot rely on ethical codes written in a pre-AI era. They must evolve from institutions that simply publish ethical rules into institutions that actively manage technological risk and build trust through transparency, accountability, and responsible innovation.

Several strategic developments define the way forward:

8.1. Integrating AI into Ethical Frameworks

Every broadcaster assessed in this study lacks explicit guidance on AI use. The absence of clear rules leaves newsrooms vulnerable to misuse, inconsistencies, and public mistrust. Ethical codes must begin to address:

- the verification of AI-generated content,
- acceptable and unacceptable uses of AI tools,
- transparency labels for synthetic or automated material,
- editorial oversight over algorithmic processes.

Without this, public service media risk falling behind international standards and losing credibility in the eyes of their audiences.

8.2. Reinforcing Transparency and Public Accountability

Transparency must move beyond document publication. Public broadcasters should offer:

- easy access to ethical codes and regulations,
- clear audience complaints procedures,
- open communication about how technology and AI are used in production.

A modern public service media institution is not only compliant, it is proactively transparent.

8.3. Strengthening Digital Verification Practices

With the increasing sophistication of misinformation and synthetic media, verification must become a core editorial competency. Public broadcasters should invest in:

- digital verification protocols,
- staff training on AI-generated misinformation,
- partnerships with fact-checking and research organizations,

- the development of internal guidance on identifying manipulated or synthetic content.

8.4. Continuous Updating

The pace of technological change requires ethical codes to become living documents. Updates should be regular, planned, and informed by:

- technological developments,
- emerging editorial risks,
- shifts in audience behavior,
- global best practices in public service media.

8.5. Building Public Trust

AI can either strengthen or weaken trust, depending on how it is used. Public broadcasters should position themselves as leaders in ethical, transparent, and responsible AI adoption. This includes:

- publishing clear AI usage policies,
- communicating when and how AI assists production,
- ensuring human editorial control at every stage.

Public service media must modernize their ethical frameworks, update their transparency systems, and embed AI responsibility at the core of their editorial culture. Only by doing this can they remain credible, trusted, and relevant in an information ecosystem that is rapidly transforming.



9 Final Summary

This regional assessment set out to understand how well the public service broadcasters of the Western Balkans are prepared for a rapidly changing media environment, one defined increasingly by digital platforms, synthetic media, and artificial intelligence. The analysis examined two fundamental pillars: transparency and AI readiness. Together, these pillars determine whether public broadcasters can maintain public trust while adapting to new technological realities.

The findings reveal a mixed landscape. All broadcasters maintain ethical codes, but their accessibility varies dramatically, from easily reachable and well-structured transparency systems to codes that are hidden, difficult to locate, or not publicly available at all. Some institutions demonstrate openness through functional complaints mechanisms and clear paths for audience feedback, while others restrict ethical complaints exclusively to employees, closing the door on public accountability.

When it comes to digital and AI readiness, the region is only partially aligned with contemporary editorial needs. Most ethical codes contain useful provisions on accuracy, online verification, and social media conduct. Several include strong safeguards against technological manipulation, reflecting earlier eras of digital transformation.

Yet none of the broadcasters explicitly address artificial intelligence, algorithms, or synthetic media, despite these tools now playing a central role in news production, misinformation, and editorial workflows. The absence of such standards leaves public broadcasters exposed to ethical, operational, and trust-related risks.

Despite these gaps, the study also highlights encouraging foundations. All broadcasters demonstrate some level of ethical professionalism, digital awareness, and commitment to public service principles. With focused reforms, particularly in transparency, open complaints systems, and the modernization of ethical guidelines, the region's broadcasters can position themselves as leaders in responsible and trustworthy use of emerging technologies.

This report is a call for timely action. The Western Balkans cannot afford to remain anchored in pre-AI ethical frameworks while the media landscape evolves at unprecedented speed. Public broadcasters must update, clarify, and openly communicate the standards that guide their work. Doing so is essential not only for strengthening their institutions, but also for protecting the integrity of public information and maintaining the trust of the audiences they serve.

Public service media in the Western Balkans stand on firm ethical ground. Now they must take the next step: modernizing their frameworks for the AI era, reinforcing transparency, and embracing their role as guardians of truth in an increasingly complex information ecosystem.



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