



REPUBLIC OF GHANA

NATIONAL MEDIA COMMISSION

MEDIUM TERM EXPENDITURE FRAMEWORK (MTEF)

FOR 2017-2019

2017 BUDGET ESTIMATES

For copies of the NMC MTEF PBB Estimates, please contact the Public Relations Office of the Ministry:

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The NMC MTEF PBB Estimates for 2017 is also available on the internet at:
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PART A: STRATEGIC OVERVIEW OF THE NATIONAL MEDIA COMMISSION (NMC)

1. GSGDA II POLICY OBJECTIVE

The GSGDA II contains (4) Policy Objectives that are relevant to the National Media Commission.

These are:

- Improve transparency and public access to information.
- Mainstream development communication across the public sector and policy cycle.
- Enhance the capacity of the media for enhanced development communication, accountability and Press Freedom
- Mainstream development communication across the public sector and policy cycle.

2. GOAL

To promote free, independent and responsible media so as to sustain Democracy and National Development.

3. CORE FUNCTIONS

The core functions of the National Media Commission are to:

- Promote and ensure the freedom and independence of the media for mass communication or information;
- Take all appropriate measures to ensure the establishment and maintenance of the highest journalistic standards in the mass media, including the investigation, mediation and settlement of complaints made against or by the press or other mass media;
- Insulate the state-owned media from governmental control;
- Make regulations by constitutional instruments for the registration of newspapers and other publications, except that the regulations shall not provide for the exercise of any direction or control over the professional function of a person engaged in the production of newspapers or other means of mass communication;

4. POLICY OUTCOME INDICATORS AND TARGETS

| Outcome indicator Description | Unit of Measurement | Baseline | | Latest status | | Target | |
|---|--|----------|-------|---------------|-------|--------|-------|
| | | Year | Value | Year | Value | Year | Value |
| Enhanced framework for media regulation especially during elections. | Number of upgraded guidelines for political journalism disseminated | 2015 | 1500 | 2016 | 2500 | 2019 | 3500 |
| Clear and well-defined ethical/professional standards that enhance national cohesion during elections | Number of new guidelines for political advertising upgraded and disseminated | 2015 | 2000 | 2016 | 3000 | 2019 | 3000 |
| | Number of Stakeholder Consultations held for their input and acceptance of the various guidelines. | 2015 | 6 | 2016 | 8 | 2019 | 8 |
| | Number of Sensitisation workshop held on guidelines for Journalism practice in Ghana | 2015 | 6 | 2016 | 10 | 2019 | 10 |

5. EXPENDITURE TRENDS FOR THE MEDIUM-TERM

The National Media Commission was allocated a budget of GH¢2,899,648 for 2015 and GH¢1,755,975 for 2016 financial years respectively.

Provisional expenditure for 2016 amounted to GH¢ **2,082,771** a decrease of 35.96% from GH¢2,899,648 in 2015. The decrease in expenditure is mainly due to downward allocation for Goods and Services as well as Assets.

With respect to Compensation of Employees, a provisional expenditure of GH¢743,500.60 in 2015 compared to **GH¢1,262,771** expended in 2016. This indicates a decrease of 58.88%.

Total expenditure on Goods and Services was G¢297,661.58. in 2015 and GH **220,000.00** in 2016 have been released. However, an amount of GH¢103,000.00 is in the process of being released.

There was a release for Assets in 2015 **GH¢600,000**. The budgeted figures were GH¢650,000.00 in 2015 and there was no allocation for CAPEX in 2016

For the 2016 to 2018 medium term, the Ministry has been allocated a total amount of GH¢1,755,989, GH¢5,837,048 and GH¢6,420,753.respectively.

6. SUMMARY OF KEY ACHIEVEMENT IN 2016

The Commission during the year under review undertook the following activities:

Media Monitoring

The Commission has begun a process of decentralization to establish media monitoring centres in all the regions starting with Ashanti, Volta and Northern Regions. By the close of 2016, the Commission has established and inaugurated these Committees in the Upper East, Central and Eastern Regions in the country. The idea is to ensure proper monitoring of the media in those regions and the need to be supported to put in place the necessary technology which will enable NMC to monitor the media, especially the electronic media.

Launching of Media Monitoring Reports

The National Media Commission in the year under review launched four of its media monitoring reports in Accra and Kumasi.

State of the Media

In November 2016, the Commission compiled the four reports and with the support of the European Union, Canadian High Commission, Australian High Commission and the British High Commission held a national forum on the State of the Media in Accra.

Stakeholder' Dialogue

The Commission continued its dialogue with stakeholders on the need for the media to support the nation's development objectives and peace efforts. Stakeholders in this process include the Ghana Journalists' Association, Ghana Independent Broadcasters Association, Ghana Community Radio Network, Private Newspaper Publishers Association of Ghana and the political parties.

Establishment of Regional Advisory Councils

There had been establishment of Regional Advisory Councils for Complaints Settlement in six regions to sit on complaints against the media. These councils are serving as first point of call of complaints. They are in: the Ashanti, Northern, Volta and Upper East regions. The others are Central and Eastern Regions.

Participation in International Bodies Activities (Acran)

Africa Communications Regulatory Association Network is continental regulatory in which Ghana for that matter the National Media Commission is a member. At the just ended Annual Conference in Cotonou, Benin, Ghana was elected the President for a two-year term



1.5. Appropriation Bill

Summary of Expenditure by Sub-Programme, Economic Item and Funding

Entity: 030 - National Media Commission

Year: 2017 | Currency: Value

Version 1

| | GoG | | | | IGF | | | | Funds / Others | | | Donors | | | Grand Total |
|---|---------------------------|--------------------|------------------|------------------|---------------------------|--------------------|-------|-------|----------------|------|--------|--------------------|-------|-------|------------------|
| | Compensation of employees | Goods and Services | Capex | Total | Compensation of employees | Goods and Services | Capex | Total | Statutory | ABFA | Others | Goods and Services | Capex | Total | |
| 030001 - Management and Administration | 435,652 | 550,756 | 1,150,000 | 2,136,408 | | | | | | | | | | | 2,136,408 |
| 0300011 - General Administration and Finance | 435,652 | 537,000 | 550,000 | 1,522,652 | | | | | | | | | | | 1,522,652 |
| 0300012- Policy Planning; Monitoring and Evaluation | | 13,756 | 600,000 | 613,756 | | | | | | | | | | | 613,756 |
| 030002 - Media Regulation and Management | 1,137,396 | 2,249,244 | 314,000 | 3,700,640 | | | | | | | | | | | 3,700,640 |
| 0300021- Media Affairs | 1,137,396 | 800,000 | 40,718 | 1,978,114 | | | | | | | | | | | 1,978,114 |
| 0300022- Media Complaints Settlements | | 1,449,244 | 273,282 | 1,722,526 | | | | | | | | | | | 1,722,526 |
| Grand Total | 1,573,048 | 2,800,000 | 1,464,000 | 5,837,048 | | | | | | | | | | | 5,837,048 |

PART B: BUDGET PROGRAMME SUMMARY

PROGRAMME 1: MANAGEMENT AND ADMINISTRATION

1. Budget Programme Objectives

- Ensure efficient and effective use of both financial and material resources of the Commission
- Develop quality human resource for efficient and effective delivery of service
- Ensure effective and efficient performance of the Commission through Monitoring and Evaluation of activities of the media

2. Budget Programme Description

The Commission through this programme will;

- Implement training programs to upgrade the skills of staff for effective delivery in the areas of quality assurance, internal controls, and risk management, monitoring and evaluation, administration and revenue generation.
- Ensure effective management of scarce resources to achieve targets of the Commission
- Provide logistics for the smooth administration of the Commission
- Ensure the preparation and implementation of the Medium Term and Strategic Plans,
- Undertake Monitoring and Evaluation of policies and programmes



2.9. Budget by Chart of Account

9 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|---|------------------|------------------|------------------|
| 030001 - Management and Administration | 2,136,408 | 2,136,408 | 2,136,408 |
| 030001 - Management and Administration | 2,136,408 | 2,136,408 | 2,136,408 |
| 21 - Compensation of employees [GFS] | 435,652 | 435,652 | 435,652 |
| 211 - Wages and salaries [GFS] | 435,652 | 435,652 | 435,652 |
| Goods and Services | 550,756 | 550,756 | 550,756 |
| 22 - Use of goods and services | 530,756 | 530,756 | 530,756 |
| 27 - Social benefits [GFS] | 20,000 | 20,000 | 20,000 |
| 31 - Non financial assets | 1,150,000 | 1,150,000 | 1,150,000 |
| 311 - Fixed assets | 1,150,000 | 1,150,000 | 1,150,000 |

BUDGET SUB-PROGRAMME SUMMARY

PROGRAMME1: MANAGEMENT AND ADMINISTRATION

SUB-PROGRAMME SP1.1: General Administration and Finance

1. Budget Sub-Programme Objectives

- To effectively manage and coordinate activities of the various Units within the Commission.
- To strengthen the financial and human resource development in the Commission through training and career development.
- To strengthen the Commission's capacity of resource mobilization and financial management
- To develop effective communication between the Commission and the media industry
- To strengthen internal controls, risk management and governance

2. Budget Sub-Programme Description

This sub-programme covers the coordination of activities of the Commission through the office of the Executive Secretary.

The main operations are to:

- Direct, coordinate and ensure efficient as well as effective management of the Commission.
- Provide logistic support for the smooth running of the Commission
- Provide career development for the Commission staff through trainings, seminars, workshops, etc.
- Management of properties of the Commission through periodic assessment, renovations and maintenance.

This sub-programme also includes the activities of the Legal Unit which is responsible for advising the Commission on Legal and Constitutional matters and their implications for the Commission's work and programmes. Through this sub-programme, the Commission liaises with the Attorney General's office and other institutions in respect of legal advice.

In addition, there is a Technical Department which deals with Information Technology and Technical Standards.

3. Budget Sub-Programme Results Statement

The table indicates the main outputs, its indicators and projections by which the Commission measures the performance of this sub-programme. The past data indicates actual performance whilst the projections are the Commission's estimate of future performance.

| Main Outputs | Output Indicator | Past Years | | Projections | | |
|--|------------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| | | 2015 | 2016 | Budget Year 201 | Indicative Year 2018 | Indicative Year 2019 |
| Development of procurement plan | Developed by | - | 30 November | 30 November | 30 November | 30 November |
| Update of Asset Register | Updated by | 31 January | 30 September | 30 September | 30 September | 30 September |
| Preparation of Cash Plan | Prepared by | - | 13th December | 18 th December | 16 th December | 16 th December |
| Preparation of financial reports | Prepared by | 31 st March | 31 st March | 31 st March | 31 st March | 31 st March |
| Preparation of internal audit reports | Reports submitted by | 31 st March | 31 st March | 31 st March | 31 st March | 31 st March |
| Preparation of annual budget estimates | Annual estimates prepared by | 30 th September | 30 th September | 30 th September | 30 th September | 30 th September |

4. Budget Sub-Programme Operations and Projects

The table lists the main Operations and Projects to be undertaken by the sub- programme.

| Operations |
|--|
| Internal management of the organization |
| Administrative Expenses |
| Workshops and meetings |
| Subscriptions and International Conferences |
| Local travels/Allowances, Hotel Expenses |

| Projects |
|----------|
| |
| |
| |
| |
| |



2.7 Budget by Chart of Account

7 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|---|------------------|------------------|------------------|
| 0300011 - General Administration and Finance | 1,522,652 | 1,522,652 | 1,522,652 |
| 0300011 - General Administration and Finance | 1,522,652 | 1,522,652 | 1,522,652 |
| 21 - Compensation of employees [GFS] | 435,652 | 435,652 | 435,652 |
| 22 - Use of goods and services | 517,000 | 517,000 | 517,000 |
| 27 - Social benefits [GFS] | 20,000 | 20,000 | 20,000 |
| 31 - Non financial assets | 550,000 | 550,000 | 550,000 |

BUDGET SUB-PROGRAMME SUMMARY

PROGRAMME1: MANAGEMENT AND ADMINISTRATION

SUB-PROGRAMME SP 1.2: Policy, Planning, Monitoring and Evaluation

1. Budget Sub-Programme Objectives

- Facilitate the preparation of the Commission's strategic plan, medium term , monitoring framework, and evaluation plan
- Facilitate monitoring and evaluation of the Commission's programs and policies
- Formulate, coordinate policies and programs of the Commission

2. Budget Sub-Programme Description

This sub-programme seeks to strengthen the capacity of the Policy Planning, Monitoring and Evaluation Unit to support the implementation of the Commission's programs.

This is achieved through:

- Preparation and review of Strategic Plan, Medium Term Plans, Monitoring framework and evaluation plan
- Collection, collation and compilation of all relevant data in relation to the Commission's functions through effective monitoring and evaluation

3. Budget Sub-Programme Results Statement

The table indicates the main outputs, its indicators and projections by which the Commission measures the performance of this sub-programme. The past data indicates actual performance whilst the projections are the Commission's estimate of future performance.

| Main Outputs | Output Indicator | Past Years | | Projections | | |
|--------------------------------------|--|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| | | 2015 | 2016 | Budget Year 2017 | Indicative Year 2018 | Indicative Year 2019 |
| Revised Guidelines | Guidelines on hate speech reviewed by | 30 th September | 30 th September | 30 th September | 30 th September | 30 th September |
| | Guideline on Political advertising reviewed by | 30 th September | 30 th September | 30 th September | 30 th September | 30 th September |
| Revised Medium Term Plan | Review completed by | 30 th September | 30 th September | 30 th September | 30 th September | 30 th September |
| Monitoring and Evaluation (M&E) Plan | M&E plan developed by | 31 st December | - | - | - | - |

4. Budget Sub-Programme Operations and Projects

The table lists the main Operations and Projects to be undertaken by the sub- programme.

| Operations | Projects |
|---|-------------|
| Policy and Programme Review activities/Publication and Dissemination of policies and Programmes | No Projects |
| Produce media mapping survey | |
| Contract legal experts to research on existing laws on media which require reforms | |



2.7 Budget by Chart of Account

7 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|--|----------------|-----------------|-----------------|
| 0300012- Policy Planning; Monitoring and Evaluation | 613,756 | 613,756 | 613,756 |
| 0300012- Policy Planning; Monitoring and Evaluation | 613,756 | 613,756 | 613,756 |
| 22 - Use of goods and services | 13,756 | 13,756 | 13,756 |
| 31 - Non financial assets | 600,000 | 600,000 | 600,000 |

BUDGET PROGRAMME SUMMARY

PROGRAMME 2: MEDIA REGULATION AND MANAGEMENT

1. Budget Programme Objectives

- To Promote and ensure the freedom and independence of the media for mass communication
- To ensure development, publication and dissemination of monitoring results
- Develop and sustain high journalistic standards in the mass media

2. Budget Programme Description

Chapter 12 of the 1992 Constitution of Ghana titled ‘Freedom and Independence of the Media’ and Act 449 spells out the work of the National Media Commission (NMC).

The Commission takes all appropriate measures to ensure the establishment and maintenance of the highest journalistic standards in the mass media including investigation, mediation and settlement of complaints made against or by the press or other mass media.

Additionally, the programme seeks to insulate the state-owned media from governmental control.

The programme also organizes workshops and has developed series of guidelines to help regulate the media.



2.9. Budget by Chart of Account

9 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|---|------------------|------------------|------------------|
| 030002 - Media Regulation and Management | 3,700,640 | 3,700,640 | 3,700,640 |
| 030002 - Media Regulation and Management | 3,700,640 | 3,700,640 | 3,700,640 |
| 21 - Compensation of employees [GFS] | 1,137,396 | 1,137,396 | 1,137,396 |
| 211 - Wages and salaries [GFS] | 1,137,396 | 1,137,396 | 1,137,396 |
| Goods and Services | 2,249,244 | 2,249,244 | 2,249,244 |
| 22 - Use of goods and services | 2,249,244 | 2,249,244 | 2,249,244 |
| 31 - Non financial assets | 314,000 | 314,000 | 314,000 |
| 311 - Fixed assets | 314,000 | 314,000 | 314,000 |

BUDGET SUB-PROGRAMME SUMMARY

PROGRAMME 2: MEDIA REGULATION AND MANAGEMENT

SUB-PROGRAMME SP 2.1: Media Affairs

1. Budget Sub-Programme Objectives

- To determine the coverage of issues such as politics, agriculture, culture as well as women and children.
- To determine how skewed the media is towards national/developmental issues
- To determine the caliber of Journalists/Media Practitioners that operate in the media industry
- To determine adherence to professional standards in the media
- To strengthen the autonomy of state-owned media

2. Budget Sub-Programme Description

The Monitoring and Research Unit of the Media Affairs subprogramme exists to formulate policies and improve upon professional standards.

The main operations include

Standards: Involves setting standards, sensitization and stakeholder consultation on standards as well as review of standards

Monitoring: Acquisition of Monitoring equipment, installation, operation and the conduct of monitoring. The Commission also undertakes stakeholder engagement to solicit input on monitoring results

For monitoring of standards, Coding Instruments are developed; reports are generated on both the Electronic and Print Media which helps the Unit and the Commission to influence media policies in the industry.

Constitutional Instrument (CI 39), 2003 mandates the Commission to register newspapers, journals and all other publications for mass communication.

Additionally, each registered publication submits two copies of every edition of the publication to the Commission and its certificate is renewable every year.

The beneficiaries include the general public, research institutions, the media, academia etc.

The Unit is challenged as a result of lack of technically skillful staff, logistical constraints and lack of funds to expand.

Funding is provided by the Government of Ghana, with some donor support from the European Union.

3. Budget Sub-Programme Results Statement

The table indicates the main outputs, its indicators and projections by which the Commission measures the performance of this sub-programme. The past data indicates actual performance whilst the projections are the Commission's estimate of future performance.

| Main Outputs | Output Indicator | Past Years | | Projections | | |
|---|---|------------|------|------------------|----------------------|----------------------|
| | | 2015 | 2016 | Budget Year 2017 | Indicative Year 2018 | Indicative Year 2019 |
| Newspapers, journals and magazines Registered | Number of Newspapers Registered | 70 | 85 | 80 | 80 | 80 |
| | Number of Magazines & journals Registered | 140 | 50 | 40 | 30 | 30 |
| Monitoring of Media (print and Electronic) | Number of monitoring reports developed | - | 3 | 4 | 4 | 4 |

4. Budget Sub-Programme Operations and Projects

The table lists the main Operations and Projects to be undertaken by the sub- programme.

| Operations | Projects |
|--|------------|
| Regulation of Media Landscape | No Project |
| Review and amend the National Media Commission Act to empower the Commission to enforce its mandate. | |
| Enact new law on fairness doctrine for state-owned. Sensitize stakeholders on new laws when passed. | |
| Accelerate the enactment of laws affecting content delivery across platforms including broadcasting law. | |
| Enact new law on complaints settlement | |



2.7 Budget by Chart of Account

7 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|--------------------------------------|------------------|------------------|------------------|
| 0300021- Media Affairs | 1,978,114 | 1,978,114 | 1,978,114 |
| 0300021- Media Affairs | 1,978,114 | 1,978,114 | 1,978,114 |
| 21 - Compensation of employees [GFS] | 1,137,396 | 1,137,396 | 1,137,396 |
| 22 - Use of goods and services | 800,000 | 800,000 | 800,000 |
| 31 - Non financial assets | 40,718 | 40,718 | 40,718 |

BUDGET SUB-PROGRAMME SUMMARY

PROGRAMME 2: MEDIA REGULATION AND MANAGEMENT

SUB-PROGRAMME SP 2.2: Media Complaints Settlement

1. Budget Sub-Programme Objective

To settle complaints through investigations and mediation.

2. Budget Sub-Programme Description

The sub-programme considers both documentary and oral evidence provided by the parties and shall rule on the issues as it considers just in all circumstances.

Its rulings can make any of the following orders:

- A retraction and an apology with equal prominence as the original offensive material
- Publication of a rejoinder
- Direct disciplinary action for breach of code of ethics

Additionally, before a ruling is made, a complaint is usually lodged by an aggrieved person. The Committee then invites the Editor of the Newspaper, Radio or Television Station for an amicable settlement.

- It serves as avenue for any person aggrieved by a publication or by the act or omission of any journalist, newspaper proprietor, a publisher or any person in respect of any publication in the media to lodge a complaint to the Commission.
- It serves as an Alternative Dispute Platform for the amicable resolution of disputes between parties.

Funding of activities of this sub-programme is provided by the Government of Ghana. The direct beneficiaries are aggrieved individuals and the media itself.

Challenges that the sub-programme face are that many editors when invited to settlement meetings refuse to appear before the Complaints Settlement Committee but the National Media Commission has no power to subpoena any editor who infringes or refuses to honour an invitation.

There is also the challenge of many media practitioners not having any training in journalism so they turn to violate the fundamental principles of the profession.

3. Budget Sub-Programme Results Statement

The table indicates the main outputs, its indicators and projections by which the Commission measures the performance of this sub-programme. The past data indicates actual performance whilst the projections are the Commission's estimate of future performance.

| Main Outputs | Output Indicator | Past Years | | Projections | | |
|--------------------------|--------------------------|------------|------|------------------|----------------------|----------------------|
| | | 2015 | 2016 | Budget Year 2017 | Indicative Year 2018 | Indicative Year 2019 |
| Media complaints settled | Number of cases received | 30 | 40 | 45 | 45 | 45 |
| | Number of cases resolved | 15 | 20 | 25 | 25 | 25 |

4. Budget Sub-Programme Operations and Projects

The table lists the main Operations and Projects to be undertaken by the sub- programme.

| Operations | Projects |
|-------------------------------|------------|
| Review of existing laws | No Project |
| Newspaper registration | |
| Complaints mediation | |
| Content regulation | |
| Broadcasting law | |
| Stakeholder consultation | |
| Stakeholder review | |
| Preliminary reviews | |
| Gazetting of laws | |
| Sensitization of stakeholders | |



2.7 Budget by Chart of Account

7 - Sub-Programme and Natural Account

Entity: 030 - National Media Commission

Funding: All Source of Funding

Year: 2017 | **Currency:** GH Cedi

Version 1

| | Budget | Indicative Year | Indicative Year |
|--|------------------|------------------|------------------|
| 0300022- Media Complaints Settlements | 1,722,526 | 1,722,526 | 1,722,526 |
| 0300022- Media Complaints Settlements | 1,722,526 | 1,722,526 | 1,722,526 |
| 22 - Use of goods and services | 1,449,244 | 1,449,244 | 1,449,244 |
| 31 - Non financial assets | 273,282 | 273,282 | 273,282 |



1.6. Appropriation Bill

Summary of Expenditure by Cost Center, Economic Item and Funding

Entity: 030 - National Media Commission

Year: 2017 | Currency: Value

Version 1

| | GoG | | | | IGF | | | | Funds / Others | | | Donors | | | Grand Total |
|---|---------------------------|--------------------|-----------|-----------|---------------------------|--------------------|-------|-------|----------------|------|--------|--------------------|-------|-------|-------------|
| | Compensation of employees | Goods and Services | Capex | Total | Compensation of employees | Goods and Services | Capex | Total | Statutory | ABFA | Others | Goods and Services | Capex | Total | |
| 030 - National Media Commission | 1,573,048 | 2,800,000 | 1,464,000 | 5,837,048 | | | | | | | | | | | 5,837,048 |
| 03001 - Gen. Admin | 1,573,048 | 2,800,000 | 1,464,000 | 5,837,048 | | | | | | | | | | | 5,837,048 |
| 0300103 - Human Resource Management | 1,573,048 | 2,800,000 | 1,464,000 | 5,837,048 | | | | | | | | | | | 5,837,048 |
| 0300103001 - Gen. Human Resource Management | 1,573,048 | 2,800,000 | 1,464,000 | 5,837,048 | | | | | | | | | | | 5,837,048 |