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Defining freedom of the press: A cross national examination of press ethics and regulation

Submission of evidence to the press regulator IMPRESS

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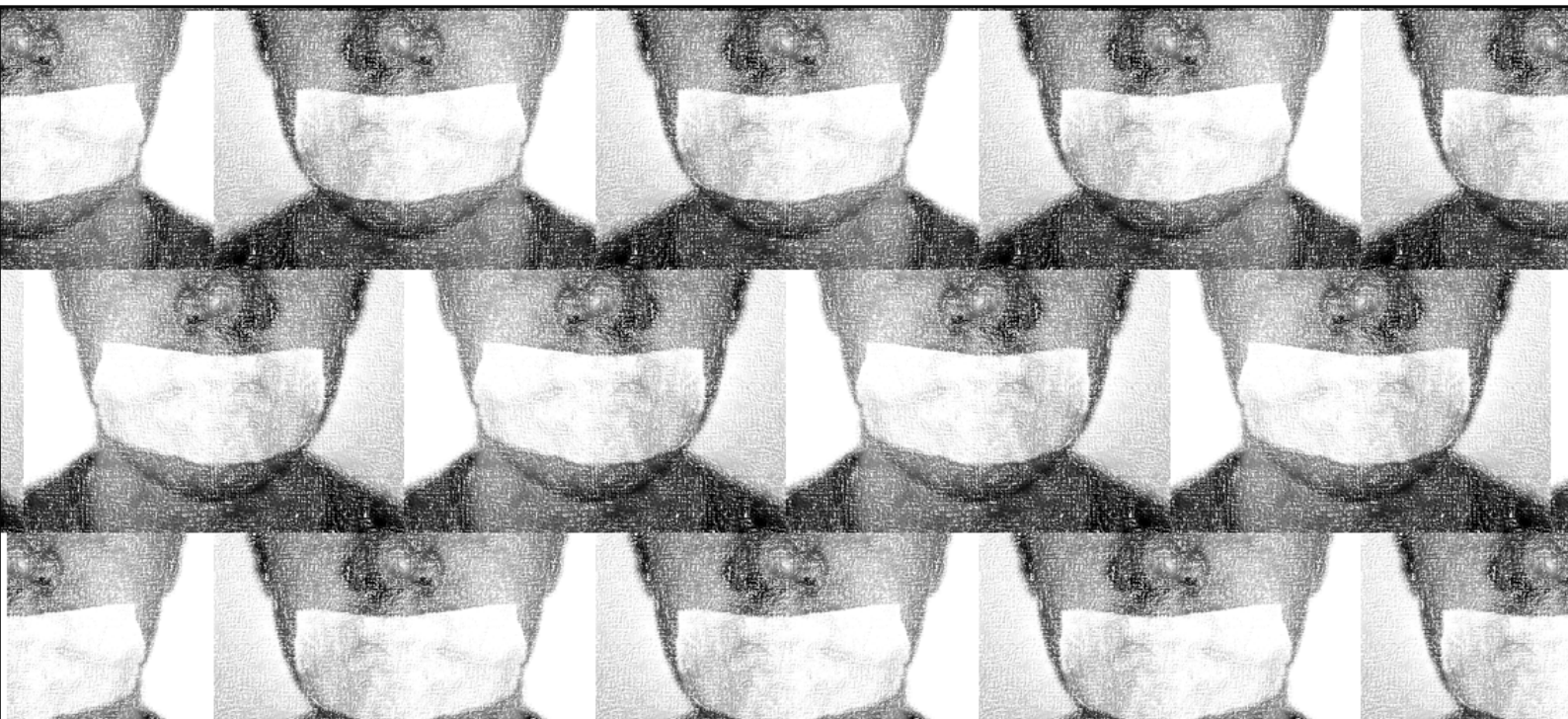
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SUBMISSION TO IMPRESS STANDARDS CODE REVIEW

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Preamble

This evidence is drawn from an ongoing study into press ethics and regulation that was, in part prompted by informal discussions with IMPRESS's former CEO Jonathan Heawood. One of the things that Jonathan noted that was lacking in the area of press ethics and regulation was a set of empirically based benchmarks that regulators could use to measure their effectiveness and assess their impact. Part of the evidence here provides just that and is intended to help shape IMPRESS's effectiveness in its role as a press regulator. Another key motivation for this report echoes the rationale behind Lara Fielden's highly regarded Reuters [report](#) from 2012. Her comparative study on international press councils sought to stimulate the debate on press reform in the UK by providing examples of how other countries deal with press regulation. Like Fielden, our research seeks to contribute to the evolving debate around press regulation in Britain by looking at press ethics and regulation across a number of countries. The evidence presented here however is intended to support and feed into IMPRESS's review of its standards code and its activities more broadly. We are more than happy to follow up on any aspects of the report if required.

1. INTRODUCTION: CONTEXT OF THE EVIDENCE

This evidence is drawn from ongoing RCUK funded research examining press codes of ethics, journalism regulation and stakeholder¹ perspectives on the role of journalism across Europe and the UK². The title of our research project '[Defining Freedom of the Press](#)', signals the acute sense that the role of the press and journalism more broadly is undergoing significant flux and disruption and freedom of the press is under a range of pressures. Our project title captures the awareness that the debate about the scope of press and journalistic freedom is highly contested. At the heart of this issue for us is the role of ethics and how specifically journalism ethics might better connect with and serve the public and what role the regulator plays in this process.

Our starting point is that, historically, debates about the role and function of the press, its ethical parameters and its modes of governance and regulation, have taken place amongst relatively elite groups in our society, with relatively little meaningful external input. Moreover, this seemingly never ending debate (Bingham, 2009) is entrenched and highly polarised as recent controversies³ have shown that the clamour for reform of the press made by media reform groups such as '[Hacked off](#)' and the [Media Reform Coalition](#) is largely met by the claim that press freedom is under threat if 'tighter' or statutory regulation of journalism is imposed from without (Luckhurst, 2012).

As such our project examines the core foundations of journalism and its relationship to the principles and practices of press freedom and how this is interpreted by a range of actors. In doing so we hope to map out its scope and limits in contemporary liberal democracies and seeking to provide a strategy for breaking through the deadlock (Wragg, 2020). The research develops a comparative approach, examining the ethical frameworks and regulatory

¹ Stakeholders in our research include non-journalist participants – broadly representatives of citizen groups who have an interest in the role of journalism and its impacts on and value to society. Our research looked to draw on perspectives of those who have historically been subject to poor treatment by sections of the press so that their perspectives feed in to empirically grounded outputs relevant to the role and function of journalism today.

² The Arts and Humanities Research Council funded project 'Defining Freedom of the Press' (project code: AH/R00644X/1).

³ The number of high profile cases of press intrusion are too numerous to mention. However, the recent tragic suicide of television presenter Caroline Flack and the ongoing dispute between Prince Harry, Meghan Markle and sections of the popular press.

parameters of the top European nations in the RSF world press freedom [Index](#). We have also examined codes of ethics from our study countries and conducted interviews with journalists, regulatory bodies and NGOs from a select number of these countries. As such our evidence is drawn from insight and analysis of data generated from areas of the world considered to have a well-functioning, free and socially beneficial journalistic environment.

In order to enhance the work that IMPRESS does and bolster its broader public significance as the press regulator, and to garner greater levels of trust, we suggest that IMPRESS could do more to frame its role in safeguarding press freedom in the UK and its role in maintaining that freedom. We suggest that this can be done by articulating how press freedom is interpreted and communicated through the various parts of the code. The evidence presented here thematically does not address the specific aspects of the Standards Code, rather it emphasises how IMPRESS might stress its role as the press regulator so as to better frame its work as being within the realms of enhancing press freedom and journalism more generally. The evidence also identifies potential benchmarks that would allow IMPRESS and others to signal how its work performs certain key democratic obligations.

Key Summary Recommendations:

- That IMPRESS prioritise the articulation and prominence of its role and responsibilities to the public
- That IMPRESS frames its role and activities - particularly in relation to the standards code – explicitly as exemplifying and upholding press freedom in the UK
- That IMPRESS actively looks to enhance public trust, through encouragement of ethical organisational cultures among its members and an ethical journalism culture within the industry more broadly
- That IMPRESS acknowledges the challenges of balancing freedom *to* communicate and freedom *from* constraint as well as the threats to these freedoms
- That IMPRESS undertakes regular benchmarking of its activities

2. Themes and Recommendations

2.1 Articulating IMPRESS's Public Role

As a regulator, IMPRESS's main role is of course to ensure the maintenance of standards amongst its members and to set the boundaries of legitimate and ethical journalism. As such IMPRESS has an important responsibility to its members in foregrounding ethical journalism and good practice and calling out poor journalism. Our research signals the important roles that a press regulator can play, from providing safeguards against bad journalism to feeding into a culture of good practice.

However, IMPRESS's role is also, albeit indirectly, to serve the public. Maintaining high journalistic standards ultimately benefits the public by ensuring that they have truthful, accurate and reliable information at their disposal. Such information is of course fundamental to a healthy democracy.

One of the key findings from our research suggests that amongst countries ranked high in the press freedom index, there are greater levels of public awareness of the role and powers of the press council/regulator. Moreover, our research suggests that enhanced awareness of the role and function of the regulator correlates to higher levels of trust and legitimacy in the system.

More specifically, a number of journalists we interviewed noted that from their perspective, the relatively high public profile of the regulator tends to feed into greater levels of public trust, not only of journalists and journalism, but in the media regulatory process itself. This was particularly stark in countries such as Finland and Norway. In other words, trust in the press is partly garnered because of the greater levels of awareness amongst the public, of the regulator's role and activities. Referring to the Norwegian code of ethics, this journalist noted:

"I think it's very important for reporters today to have a framework like this, that we can all agree on, and that we can tell people that, why should you trust the journalists, why should you trust what you read in the established media. Well, it's because these are the rules that apply to us. [...] I would rather say that not having these rules would get in the way of my work and my ability to be trusted as a reporter." (NO/02)

As such we see a clear sense that the codes of ethics serve not only journalists but the wider public as well. It could be argued therefore that greater levels of public knowledge of the regulator and its role may help to help re-legitimize journalistic activity and enhance trust in journalistic processes. Therefore the press council plays an important symbolic role in enhancing the profile of quality journalism and faith in its practices.

Generating Trust

Part of the process of garnering public trust is breaking down much of the mystique of journalism itself and allowing the public to understand the challenges that journalists face in curating the news. IMPRESS's approach to raising awareness of its activities, as part of its obligation to editorial freedom, could therefore be to highlight how the code is used by practicing journalists in helping them ensure that the public are protected. As this journalist indicates when speaking of the Finnish code:

"It's like a back bone, you can rely on it, and check what to do in certain situations. Of course, it doesn't give you direct answers to every problem you have, but at least there's something that you can weigh, like, you know, is this right, should I do something else, should I publish this name, or should I not? That sort of thing. And it does give pretty clear answers to some of those questions." (FI/06)

It is noticeable that standards codes not only work for journalists, but can feed into public understanding of how journalism works and how it polices itself within a system of self-regulation. Enhancing levels of media literacy concerning ethics is an important contribution that IMPRESS could make to public understanding and trust. The overwhelming emphasis of the existing standards code is on the publishers and the journalists. However, this of course creates the impression that it is not written for the public or with public values and virtues in mind. This seems at odds with the notion that the press is there to serve the public. Though we are aware that IMPRESS engaged with the public in the development of its code, we suggest that such engagement should be a regular part of IMPRESS's benchmarking processes.

We suggest therefore that purposes of the standards code should be made clearer and attention to the purposes it does and can serve to enhance audience trust

should be made. In other words, the standards could more clearly articulate how upholding the codes contributes to an overall situation where the public can have greater trust in journalism.

The news organisations that described having very good levels of trust with the public have specific strategies to ensure that they regularly engage with their audiences and maintain a relationship with them. For example, a newspaper in the Netherlands (*Trouw*) have regular meetings with their readers:

“Well when it comes to Trouw, we have a lot of very fanatic readers, like really... Yeah. And I think it’s also because of the history because it used to be a paper from the resistance, so there’s a lot of people who either were in the resistance but they sort of all died in the last few years, but if then, their parents were in the resistance so they really feel like it’s their newspaper. Which on the one hand it’s great, like they’re really committed and they’re really... Like we have these days there’s the everyday... There is the Saturday when we invite readers and they all... Like a lot of people come to the newspaper...”. (NL/02)

IMPRESS could draw on this example to encourage its members to reach out to their audiences and engage with them more meaningfully as a contribution to media literacy. Likewise, IMPRESS could also have ‘open days’ and/or roadshows and public engagement activities.

While great efforts have gone into developing a “co-creation process” with the public, we suggest IMPRESS build upon these activities and develop a process of longer term and sustainable engagement with members of the public regarding the development of the standards code. As such, transparency of process and engagement with the public in the development and refining of standards is suggested here. This could be done by convening stakeholder panels and focus groups, surveys, public opinion polling, regular consultations and other public engagement activities as mentioned above.

It is worth noting the Dutch Press Council’s very specific answer to the question of how and why they are effective.

“And I see that when it comes to the decisions of the Council, that to begin with, we believe that when a complaint is upheld, it gives a moral redress to the complainant. That most media outlets publish our decisions, it is in a summary but still they do it. And it leads to debates, really debates either in the specific newsroom of the media outlet. We hear about it, people say to

us, your decisions lead to discussions in our media outlet, which I think is good. And sometimes it depends on how important the cases are, you can see that it leads to more broader discussions maybe in other media as well.”
(NL/05)

Public trust and the prominence of public engagement with IMPRESS and its purpose and processes seems imperative. A stronger and more visible engagement with the public and with organisations who represent groups who have been subject to press abuses seems a logical way to build trust. Putting out calls for evidence from the public is obviously good practice, however, we suggest that the remit is broader and seeks actively to garner a wider range of voices and perspectives. In sum, we think that IMPRESS could signal a more prominent role for the public in its strategy. This might be done via national roadshows and other out-reach events around the country, regularly seeking input from minority groups and interests and greater visibility across media.

Articulating IMPRESS’s public role - summary recommendations:

- Raise the public profile of IMPRESS
- Clearly signal IMPRESS’s areas of responsibility – including to the public - and how these activities contribute to enhancing journalism more generally
- Stress the role of the Standards Code in contributing to ethical journalism and the broader public good
- Enhance levels of trust by providing greater scope for public and stakeholder engagement in IMPRESS’s activities, particularly the of voices of minorities and marginalised groups
- Consult widely with other bodies and associations on decisions and processes

2.2 Defining ‘freedom of the press’

One of the key challenges for regulators such as IMPRESS is addressing the unhelpful view that the role of the regulator is essentially on that is restrictive – to set limits and enforce these. We suggest therefore that in order to respond to this perception, the IMPRESS code makes clear within its contextual information, how the elements of the code operationalise and contribute to press freedom as a concept and in practice. This way freedom of the press is seen as being enhanced by IMPRESS and its standards code.

In articulating this freedom, we suggest that it would be helpful to more clearly articulate how specific aspects of the code advance the principle of press freedom. Freedom conceived as both negative (freedom from constraint) but also positive in the sense that IMPRESS, in principle and practice, supports a diversity of publications and voices. It is this commitment to plurality of voices that also signals press freedom as it is more acutely tied to the broader democratic significance of press freedom, as opposed to the commercial.

The concept of press freedom is clearly distinct from individual freedom of expression. The press are a set of organisations which have historically tended to garner freedom of expression rights on behalf of their audiences by virtue of their role in the wider media ecology and public sphere. However, we think that it is worth signalling the distinction between institutions and audiences in relation to the principle of freedom of expression given that the principle is often and in our view unhelpfully applied to both institutions (and the journalists who work there) and individual citizens. We think it would be beneficial if IMPRESS more clearly articulates how its role as a regulator, gives life to the concept of press freedom in its work. In this sense IMPRESS is clearly signalling how its work actively contributes to press freedom rather than restricting it as some opponents may argue.

Our interviews were useful in providing scope for the journalists to articulate what they understood press freedom to mean. They generally spoke of freedom in positive terms – as freedom to publish and to say what they wanted “more or less”. However, later on in the interviews, the respondents tended to moderate this conception of freedom by reference to their responsibilities to the public.

“The code of ethics allows us to publish what we want as long as its valid information and based on truth and that is definitely in the public’s interest, I think.” (DK/06)

A feature of the press in our European countries is the tradition of the strong and independent press in the country and trust in the system of self-regulation as working for all. Self-regulation was seen as being one of the most important contributors to the high rank of these countries in the press freedom indexes. Much of the moral weight behind this relates to how ‘self-regulation’ tends to imply independence from the mechanisms of the state and harsh legal

restrictions. We think that IMPRESS's role as an independent regulator should be more clearly and boldly articulated, particularly in relation to its role as acting in the interests of the wider public. Part of this process might involve more clearly signalling key principles such as public interest, harm, privacy etc. Moreover, IMPRESS itself could do more to emphasise its own independence as press regulator.

Our research suggests that the inculcation inscription of press freedom within the institutions of press regulation and the codes of ethics also underpins this and helps to reinforce trust. Evidence signals that the principle of press freedom is one that is never unlimited and always comes with specific boundaries. This is important as a number of our respondents noted, the first responsibility of the press is to be truthful and accurate and these values need to be signalled more prominently in the framing of press freedom and underpinned by the code. Speaking of their role as a journalist, this respondent noted that:

"...it is to ensure to give a truthful image of the reality as possible, to tell the citizens what the consequences are for them with this political decision, what happens then and when one is at a local newspaper one also has part of the responsibility that one is part of their community". (DK/04)

A number of our research countries were very clear about articulating how the activities of the press council or regulator explicitly tie their codes of practice to the concept of 'freedom of the press' and broader democratic rights. Though the principle of press freedom is often poorly defined, it is apparent that some press councils signal this notion explicitly in their work. For example, the press council in Switzerland positions itself as "[defending] freedom of speech and freedom of the press", as well as contributing to "reflection and debate" on "fundamental questions on media ethics". Again therefore the cultural and democratic contribution that are signalled to great effect here.

In Denmark, the standards code signals good practice and performs as a moral arbiter in the work of journalists. One journalist pointed out that making sure that the public understand the value of freedom of the press is an important part of maintaining it and fighting for it on a daily basis. According to this Danish journalist:

"I think, that a free press has to go hand in hand with the journalists, with a very solid moral compass in each journalist and in the press corps as a whole. I mean, a free press without a moral compass would be mayhem, I think, right? And you can try to regulate out of that mayhem but that would not be a society I would like to live in. So it all comes down to the moral compass". (DK/06)

Our research has also revealed that some countries also signal that their ethics or standards codes underpin and safeguard press freedom as part of a democratic imperative.

"I think this democratic debate, that is really very, you can feel it because it's part of our political system, of our daily life somehow, so this makes it important. People are aware that they need press of a high quality, I would say." (CH/05)

However, this should not be taken for granted and in countries such as the Netherlands, where trust in journalism, as in the UK, is in decline, articulating the meaning and substance of the concept of press freedom forms part of a response to this decline in trust. As this respondent indicated:

"Press freedom is something you have to fight for every day and in public debate, in respect to the government, in respect to the readers, in cooperation with the readers, and the readers are not one block. [...] So press freedom is never a safe and easy subject, you have to defend it, you have to fight for it, you have to explain it. Not only to authorities but even to the public." (NL06)

Defining 'freedom of the press' - summary recommendations:

- Stress the parameters of press freedom confidently and clearly
- Emphasise how the Standards code and its elements proactively contribute to the principle and practice of press freedom and its boundaries
- Signal the democratic role that IMPRESS plays in safeguarding press freedom via its activities

2.3 Press Ethics and Culture

It is obvious from our research and from previous studies that specific national cultures have a very important role to play in democratic legitimacy and feelings of trust amongst the population. Apart from Denmark, trust in journalism tends to be

high in the higher ranked countries, though even in these countries it seems that trust is gradually being eroded. We obviously recognise that the UK is very different from our European study countries. The history of the press in the UK and the specific development of its professional and ethical institutions have clearly shaped the unique character of the UK press and the challenges faced by regulators in part reflect this. The discussion of culture below is included here to highlight how significant a clear sense of ethics is within news organisations and the role it can perform, even in the background, to shaping good journalism practice. We therefore emphasise IMPRESS's role in further contributing to this culture more broadly.

Within our study countries, there was a very strong sense that institutional culture played an important role in shaping and enforcing good ethical practice. Many of the interviewees indicated that the press council and their codes of ethics were largely in the background of their thinking about their role, with the ethics codes only coming to the fore when a difficult ethical issue was being grappled with.

"they're just practical guidelines you can, you have sort of in the back of your mind." (DK/03)

Moreover, it was clear from our study that ethical culture also stems from the newsroom, as if handed down from generation of reporter to generation. Journalists indicated that they tend not to rely on, or even consider the code in their day-to-day practice. Rather, they are aware of it and familiar with its principles and scope. Codes of practice from within news organisations seem to play a similar role. For example, press ethics in the Netherlands tend to be learnt primarily through the process of socialisation and become part of practice via discursive construction - journalists learn from more senior journalists and consult each other, and their direct line managers when in doubt.

So it can be seen that the ethical parameters of journalists' work becomes internalised, either through acquaintance with the standards code or through ethical work practices.

"When entering a work-place... you're schooled into this common perception of what to do and how far to go." (DK/02)

Moreover, the codes seem to become internalised and a matter of common sense:

“The code of ethics regulate common sense, or, you know, sets the frames what is common sense in journalism.” (DK/06)

“they’re just practical guidelines you can, you have sort of in the back of your mind.”(DK/03)

Organisations such as IMPRESS clearly have a role to play in shaping ethical culture of their members’ organisations and we suggest that IMPRESS explicitly recognise this role, while signalling its commitment to editorial freedom. We are not suggesting that IMPRESS should seek to enhance its powers to influence content and practice, rather that it plays a more active role in signalling the virtues its own civic and democratic imperatives.

Foregrounding the notion that establishing and maintaining legitimate and ethical cultures within a news organisation could be much more pronounced, thereby signalling its contribution to the culture of quality journalism. In other words we suggest that IMPRESS might wish to signal that its standards code can form the basis for the development of an explicit ethical journalism culture, particularly within newer organisations and start-ups. It could proactively offer to support them in setting up strong internal ethical cultures/systems.

One of the strongest themes to emerge from our research that relates to the culture of the press in our sample countries is the role that shame plays in helping to police journalism ethics. The idea that a news organisation or even individual journalist could be brought to the press council or have an adjudication against them, filled many journalists with horror. The overriding feeling of shame being the most dominant feeling and it is clear that this is related very much to the culture of esteem that the regulatory system has within some of our countries.

“But of course, no media is interested to be blamed by a Press Council, that’s for sure. It’s not very easy to deal with.” (CH/05)

“Well, shame, really, because if you break the rules and somebody complains, the media ethics committee investigates, and then they give out their decision, saying that, yes, you broke the rules. And we have to publish... So it’s shame, it’s really you don’t want to do that. It happened to me once and you remember it always.” (FI/03)

Clearly the disciplinary power of a concept such as shame is related to the specific cultural associations within our sample countries and something that cannot

easily be replicated in the UK. However, we feel that there is scope in IMPRESS clearly signalling what good ethical journalism is in its work.

Moreover, as with the Dutch press council, IMPRESS might link with external bodies such as the NUJ to reflect on its decisions. Thereby cementing its role as a key driver for ethical journalism in the industry.

Finally, our findings also indicated the possibility that higher ethical standards may well be as a result of closer and different relationships with readers than daily newspapers in the UK traditionally have. IMPRESS might therefore consider providing examples of ways to foster closer and more trusting relationships with readers such as the benefits of pursuing subscription based funding.

Press Ethics and Culture - summary recommendations:

Clearly articulate how an ethical culture within news organisations can contribute to ethical journalism in practice

- Signal how IMPRESS can help member organisations set the parameters of such a culture
- Regularly consult with external bodies such as the NUJ, AJE and academic groups (MeCCSA) to seek input on its process
- Trust is key so opening dialogue with audiences about how to best foster trust in the news is imperative

2.4 Challenges and threats

Even though the interviews took place in countries that are highly ranked in terms of press freedom indices, there are still challenges to overcome. Interviewees also spoke about the threats to press freedom, whether in relation to the harms experienced by journalists online – threats and intimidation, the commercial pressure on journalists and news organisations or ‘creeping self-censorship’. The broader erosion of public trust in journalism is felt to be having an impact on the notion of freedom of the press because of the levels of scepticism and criticism being aimed at journalists from the public is becoming quite abusive and extreme in some cases.

The challenge from others

One of the main challenges signalled by our respondents however, came from the corrosive influence of disinformation and fake news. Disinformation, misinformation and the associated crisis of legitimacy faced by institutions (not only the press) is a major issue as this respondent suggests:

“I’m afraid that [algorithms are] a problem for democracy, that the citizens can’t completely see the difference between what is balanced news and what comes from some sources that would like to convince you about something in particular.” (DK/04)

However, like trust, regulators can help address the diminishing legitimacy of news organisations and the confusion brought about by fake news and the spread of misinformation. We suggest that IMPRESS highlights the impact that these technologies have in actively undermining good journalism by signalling the detrimental impact on the news ecosystem. In doing so IMPRESS is emphasising its role and remit as regulator in seeking to sustain ethical journalism, thereby emphasising how its standards are in diametric opposition to those who procure and disseminate disinformation.

One way of doing this might be by working with other regulators and media providers in a concerted effort to address [shortfalls](#) in media literacy. In Finland, for example, media literacy classes are run in [schools](#) and we think there could be opportunities for media regulators such as IMPRESS, OFCOM and IPSO to work together do more in terms of promoting media literacy to help tackle this problem. We argue therefore that informed critical knowledge of the workings of journalism and how it is regulated can contribute to raising levels of trust more broadly.

Challenges from within

In addressing day to day problems, IMPRESS could also give guidelines for how organisations deal with news that they have yet to verify/confirm or for stories that are gaining traction yet seem dubious. For example, one newspaper in our study had developed a new format where they openly question the validity of news stories that are appearing in other Dutch media.

“We have a new section on our website called, Is This News? In which we show stories which are everywhere, which we don't do and then we tell our readers why we don't think it's a story.” (NL/01)

We think that it would be a may be a good practice in the UK for larger organisations to flag-up stories that are gaining traction, and providing a justification of why these are not being covered in the organisation. In its developmental work with publishers, IMPRESS could provide greater guidance on accuracy, noting the problems that clickbait/headlines cause in relation to eroding public trust.

Amongst the numerous threats to good journalism was the impact that online platforms had in both undermining quality journalism and increasing the speed of the journalism process. It was the perceived requirement to match the speed of dissemination of social media platforms and the need to have a quick turn over of stories that many journalists thought impacted greatly on their ability to act responsibly. There was a real sense that given the pace of work there was an increased risk of making mistakes.

“So the one thing is just the speed side of it. So usually going slower usually helps to prevent overstepping lines, regulatory lines. [...] So let's say it makes investigative reporting more dangerous. And more dangerous in the sense of it elevates the risk that things slip by.” (CH/03)

There was some concern, particularly within the Swiss context, about the reduction in the amount of time available to journalists to check facts and offer the right to reply. We suggest that the IMPRESS Code, or perhaps the guidance notes, might be improved if it included an explicit commitment on the part of editors or participating organisations to ensure that journalists are given sufficient time in the production of each story to ensure that they can reasonably be expected to meet the demands of the code. Ensuring that the ethical environment is up-to-speed with the technical environment should be seen as imperative and to be clear about its approach to these issues should be at the forefront of IMPRESS's strategy.

With our transcripts there was a feeling that the ethical environment for journalism struggles to keep pace is not keeping pace with technological developments and the harms and dangers that can arise from the current

technological era. There was a strong sense that the pace of change is not adequately reflected in the way in which ethics are considered and applied. Obviously, journalism regulation in the UK is complex -IPSO's standards code for the majority of mainstream print and online publications; Ofcom for broadcasters and IMPRESS for newer regional and independent organisations. We think that IMPRESS could do more to acknowledge the complexity and the challenges it and other regulators face, particularly in relation to how the ethics of online journalism faces particular challenges. This could be done by engaging in regular reviews of the standards code and the processes under its remit as well as generating greater levels of public engagement as noted above.

Challenges and threats - summary recommendations:

- Emphasise the range of threats to freedom of the press that exist, external to journalism and within journalism
- Play an active role in developing critical media literacy skills, if possible with other organisations
- Actively work toward strategies to address the problems caused by clickbait type content
- Emphasise the role that time pressure plays in shaping contemporary journalism and the dangers therein
- Clearly signalling the threats and dangers of online harms to the news ecology and regularly reviewing its procedures

3. Benchmarking

Following on from our recommendations above, we suggest that IMPRESS engages in regular benchmarking and performance indicator protocols to ensure that that best practice is identified and showcased. Benchmarking also allows for comparisons with other regulators and provides opportunities for reflecting on and improving its policies and processes. Though we are aware that IMPRESS have mechanisms of measuring their performance, the benchmarking signalled below stems from our research findings thus far and therefore should be considered alongside the recommendations above.

Key benchmarks and performance indicators might address:

- The extent to which the benefits of the standards code contributes to an ethical culture of journalism amongst its member organisations. This could be achieved via regular consultation with members.
- The extent to which the standards code and the practice of the regulator explicitly articulates its role in safeguarding and enhancing press freedom. Again, regular public and stakeholder consultation could aid this process.
- The extent to which the code and the regulator more broadly, explicitly serves the public in relation to press freedom and freedom of expression. As above.
- Assessment of IMPRESS's success and effectiveness in relation to serving its members
- Assessment and representation of how well IMPRESS engages with the public and consumer groups in relation to its role and activities
- Articulation of best practice and how these feed into the above

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