

# **BETWEEN MEDIA OWNERS, JOURNALISTS AND AUDIENCE**

Report on the study  
of international experience  
in media self-regulation

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See the rest of the materials of the project here: **Mediametrics** - <https://www.regioncenter.info/en/media-metrics>.

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“Region” research center



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## **BETWEEN MEDIA OWNERS, JOURNALISTS AND AUDIENCE**

*(Report on the study of international experience in media self-regulation)*

### **HISTORY AND GEOGRAPHY OF MEDIA SELF-REGULATION**

A study<sup>1</sup> of the international experience of media self-regulation shows that the forms and principles of the activities of relevant institutions in the historical context have undergone significant changes, getting more and more diverse. The first of the currently known Press Councils, founded in 1916 in Sweden, functioned as a “court of honor” and was set up by the three main journalistic organizations - the Swedish Union of Journalists, the Association of Newspaper Publishers and the Publicists’ Association. The Swedish PC (in Finland it is also considered the “ancestor” of their current one, since it covered Finnish-language print publications issued in the country’s area, which was then part of Sweden) was guided by the Code of Ethics adopted in 1923 and initially served to regulate contradictions between journalists and publishers. At the same time, the purpose of its activity lied not in resolving employment disputes in a broad sense, similar to trade unions, but, first of all, in protecting the right of journalists not to perform tasks imposed on them by the employer if they contradicted the agreed ethical standards. Modern self-regulatory bodies, however, have considerably different functions and mainly regulate relations between the media and the public (audience representatives).

The role of professional and industry associations (of both employers and employees) in the activities of the Press Councils remains key. At the same time, today structures representing the public at large (engaged in human rights, protection of consumer rights), as well as

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<sup>1</sup> The main study methodology was a survey of AIPCE members from 30 countries, conducted in February-March 2022.

government, including the judiciary, can also be founders of Press Councils. In rarer cases self-regulatory bodies are set up by individual journalists (as in the case of the Ukrainian Commission on Journalistic Ethics, founded in 2001 and registered as a public organization in 2003). There are also precedents (for example, the Georgian Charter of Journalistic Ethics) of “self-established” civil society organizations, which not only deal with information disputes based on complaints, but also perform a broad array of functions typical of multidisciplinary media NGOs.

**Press Councils** (which may appear under different names, namely, apart from the above-mentioned Georgian Charter, these are Media Councils, the Public Press Complaints Collegium as in Russia, the Commission on Journalistic Ethics as in Ukraine, etc.) are an important element of the European media tradition. They became especially widespread after the Resolution 428 of the Parliamentary Assembly of the Council of Europe (1970), which recommended that journalists institute Codes of Ethics and Press Councils. The Alliance of Independent Press Councils of Europe (AIPCE)<sup>2</sup>, established in 1999, brings together 32 national PCs, including the Media Ethics Observatory of Armenia. The last country to obtain representation in AIPCE was Lithuania already in 2022. In addition, Press Councils have been created and operate in other regions of the world, some of them (PCs from Australia, New Zealand, Israel, South Africa, Republic of Korea, Mongolia, Sri Lanka, etc.) are engaged in the work of the European Alliance in the status of associate members or observers.

In fact, only less than two-thirds of the countries of European continent are represented in AIPCE, among which there are no quite large and media-developed Poland, the Czech Republic, Italy... Meanwhile, Belgium is represented by two (PCs separated on the basis of language - Flemish and French/Walloon). After the 2014 termination of activities the British Press Complaints Commission conditioned by a deep internal crisis, the United Kingdom is also represented by two organizations - the Independent Monitor for the Press (IMPRESS) and the Independent Press Standards Organization (IPSO). Spain is represented not by a national but by the regional Information Council of Catalonia. If in the case of Belgium, the “non-standard” situation is due to objective circumstances (the audience of the media in the country’s two main languages is different), then in other cases this is caused by the difficulties in establishing self-regulatory systems and bodies.

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<sup>2</sup> See <https://www.presscouncils.eu>

As the situation analysis shows, in all European countries in one form or another there are codes of professional ethics of journalists (quite advanced ones, by the way), nevertheless, the establishment of self-regulatory institutions requires particular efforts, which the media community not always manages to cope with, or not sufficiently recognizes their importance.

Thus, the British Press Complaints Commission was founded in 1953 and was widely perceived as the most successful example of media self-regulation. It, in fact, became the initiator of the AIPCE, but after 61 years (in 2014) it was forced to cease to exist due to sharp criticism for the violation of the balance in observing the interests of the media industry and the general public in favor of the first. This story has become a loud evidence of a number of varied obstacles in the way of such undertakings.

**The decisive factor for the efficient work of Press Councils is the very ability to find a formula for balanced consideration of the interests of media owners (management), journalists (authors of pieces) and the public (audience).**

**Accordingly**, the objectives of the current study on the experience of self-regulatory bodies that are members of the Alliance of Independent Press Councils of Europe are not limited to:

- summary of various aspects<sup>3</sup> of the activities of the Press Councils and analogous structures, but also (which is also important for promoting the initiative and gaining credibility);
- creation of guarantees for the harmonious consideration of various interests arising in the process of making and dissemination of a mass information product;
- appropriateness of combining different institutional models of self-regulation;
- building a regime of relations with the state and other political institutions;
- interaction with related areas of professional and civic activity;
- engagement in international cooperation formats for experience exchange and harmonization of common approaches to media self-regulation.

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<sup>3</sup> Aspects such as the determination of the mission, establishment issues, activity management schemes, models for the formation of a complaints' review and decision-making body, media covered, range of potential complainants, sources of funding, etc.

The goals of self-regulatory bodies are couched as protection of freedom of expression, dissemination and receipt of information while observing the rights of various parties involved in the process.

The most near-perfect model for establishing Press Councils is the consolidation of the efforts of organizations, which:

- a) defend the interests of independent activities of journalists, including the social aspect (journalistic trade unions);
- b) represent the interests of the media business, industry;
- c) uphold high standards of journalism through mutual commitments of media professionals (associations, press clubs with individual membership).

Here, problems emerge with countries where there are no sustained organizations of all three directions. As a rule, the third category takes the initiative. But at the same time, in order to succeed, it needs to attract important players, which have influence in the first two areas that have not succeeded or have not been fully shaped (official regulatory structures, entrepreneurs attaching importance to business ethics, quality information products, etc.)

There are no common solutions regarding the legal status of self-regulatory bodies, since the issue depends on the legislative system of a particular country and the nature of the state's involvement in the establishment and regulation of their activities. These can be foundations, public (non-governmental, non-profit) organizations, legal entities of public law, etc. For the efficient management of activities, most of the developed and more or less resourced Press Councils have two main departments: these are the conditional secretariat, which is responsible for organizational, communication, technical issues, and the collegial body (commission), directly involved in the review of complaints. There are precedents (for example, the Swedish or Irish PCs) of more complex schemes, including, in particular, an Ombudsman, who with the help of his/her office actually develops judgments on complaints by citizens and organizations. And only in complex, controversial cases appeals to the PC are forwarded to the collegial body. The same body may discuss the cases of disagreement between complainants with the decisions of the Ombudsman.

# PRESS COUNCILS MODELS

Traditionally, the Press Councils encompassed only the print media. It was believed that the broadcasting industry was regulated by the state through relevant laws, licenses, regulatory bodies. This was mainly conditioned by the fact that radio and television used a limited public resource, had a special responsibility for the content of their products, and could be sanctioned by regulatory authorities. However, with the development of communication technologies and the gradual loss of relevance of the thesis of “limited public resource”, some of the Press Councils in the last quarter of a century started to expand the scope of their activities to include the broadcast media. The issue of inclusion of online platforms in the scope of common self-regulation was a more discussed one. However, over recent years it has been resolved in favor of expanding the range of media, against which complaints may be potentially submitted for review. Relatively “young” Press Councils are initially set up for activities covering all types of media. But at the same time, the traditional Press Councils remain (in Germany, Switzerland, Belgium, Norway, Ireland, etc.), which continue to act as self-regulatory bodies for the printed press and official online versions of print outlets.

Although media self-regulation systems are characterized as being created on a voluntary basis, a number of experts believe that state bodies should be included in the process in order to increase their efficiency. Among other things, they propose the institute of recognition of self-regulatory bodies and the application of certain mechanisms for regulating their activities through media laws. Such models have been conventionally called “**co-regulation**”. For a specific review of various approaches to this issue, let us discuss the experience of some European countries, which might be interesting from the point of view of their introduction in Armenia.

**Denmark** - Notably, the recognition of self-regulation at the legislative level determines the core of the model applied in Denmark. According to the “Media Liability Act”, the content and conduct of all media in the country must comply with common ethical standards. Complaints on violations of the relevant rules can be filed directly with the media or the Danish Press Council. To be covered by the mentioned Act, the media must be registered with the Council. The Act regulates the formation of the PC composition. In particular, it should include a chairman, a vice-chairman and 6 members appointed by the Minister of Justice. The PC chairman and his/her deputy must be lawyers, and their candidacies are presented to the minister by the President of the Supreme Court of Denmark. Two members



of the Press Council are nominated by the Danish Union of Journalists, two more should represent the media leadership, one for print and the other for broadcast. The remaining two seats of the Press Council are for members of the public, which are nominated by the Adult Education Council. The Danish PC considers cases that contain violations of “healthy ethics”, decides on the response to the media, including its content, the form and place of its publication. The Council also determines the timeframe and procedure for the review of the complaint. The Danish model can be viewed as a “classic” example of successful co-regulation.

**Sweden** - The Swedish system of media self-regulation is based on a purely voluntary basis, government not taking any part in its activities. Adopted in 1923 and updated in 1994, the Code of Journalistic Ethics aims to maintain high ethical standards and envisages, first of all, protection of citizens from interference in their private lives, libel and dissemination of other information harmful to them. The institution of the Press Ombudsman, mentioned above, was established in Sweden in 1969. The Press Council in this country is composed of 6 members, two of whom are prominent public figures, three are delegated by media organizations, the sixth, which acts as chairman with a decisive vote, as a rule, is a judge of the Supreme Court. The engagement of the state with the system of self-regulation goes no further than this.

**Germany** - The German Press Council was established in 1956 and relied to a large extent on the experience of the British Press Complaints Commission mentioned above. It is an independent organization financed 57.5% by media owners, 17.5% by journalists and 25% by the government. The interest of the latter lies, first of all, in the fact that thanks to the PC, the burden on the judicial system in resolving information disputes is reduced. Only professional journalists can be members of the Council. There are 15 of them in total (in line with the number of federal lands), the chairman and the PC members being elected for a period of 4 to 8 years to ensure rotation.

**The Netherlands** - The founders of the Netherlands Press Council in 1960 were the Union of Journalists, the Society of Chief-Editors, the National News Agency, a number of other media organizations and state regulatory bodies. In the 2000s “Planet Internet” organization joined them. The Council is composed of 16 members, 8 of which are from the media community and 8 from the general public. In contrast, for example, to Denmark and Sweden, complaints to the Dutch PC can be submitted not only by individual citizens, but also by organizations, including commercial ones. As in a number of other countries, the chairman of the Council here must be a lawyer. The PC secretary must also have a legal

background. A peculiarity of the Dutch model is that when making decisions, the members of the Press Council rely not only on the current code, but also on new criteria generated in the process of the review of complaints. Thus, a case-based approach is practiced here.

**Ireland** - Under the Irish “Defamation Act”, courts take into account whether the media targeted by complaint was part of the self-regulatory system, whether its conduct in the case under consideration met the standards set by the Press Council and the Press Ombudsman. Moreover, a structure whose activities comply with the requirements of the above-mentioned Act is recognized as a self-regulatory body. Thus, the minimum requirements for the Press Council(s) are set by law, including the formation mechanisms, the procedure for reviewing complaints and making decisions. At the same time, the Press Council is fully independent in exercising its functions. Any media distributed in Ireland is eligible to become a member of the PC. This body is composed of 13 members, 7 of which represent the interests of the public, 5 - of owners and publishers, one - of journalists. To familiarize and investigate the circumstances of the complaint and release a judgment on it, the Council appoints a Press Ombudsman. If the issue is not resolved at its level, then it is submitted for discussion by the PC.

**Belgium** - As noted above, there are two Press Councils in Belgium. They are self-regulatory bodies for the print media, published respectively in Flemish and French. In addition, there are also Audiovisual Media Councils for both linguistic communities, which review complaints against broadcasters. PCs can be considered “closed” structures, since they are created exclusively by representatives of the professional journalistic community. The Flemish Council is more famous and influential, it has 18 “main” and 18 “reserve” members, which participate in sessions, but have no vote in decision-making.

**Bosnia and Herzegovina** - The Press Council of Bosnia and Herzegovina is registered as a civil society organization by the Ministry of Justice. It is composed of 9 main members, and two more can replace them if needed. The five members must have a journalistic background, and four are selected from those who have never been involved in journalism: usually these are lawyers and representatives of academia. None of them should engage in political activities. The PC both reviews complaints (the personal interest of the applicant is not a prerequisite), and may come up with judgments regarding certain publications on its own initiative (at the suggestion of the chairman or his/her deputy). Prior to releasing own decision on a complaint, the Council attempts to conciliate the parties.

# REVIEW OF COMPLAINTS AS MAIN MISSION

Since, the main way of fulfillment of its mission by the Press Councils is the review of complaints, the determination of a proper complainant and a proper respondent is among the key issues for them. As can be seen from the above examples, the approaches of even the most advanced self-regulatory bodies with deep roots differ. And for each case there are grounds conditioned by a specific situation in the information space of the respective country. Nonetheless, an analysis of the experience of the leading European Councils allows to find optimal solutions for the future.

For relatively new self-regulatory systems in need of increase in public awareness of their activities, it is advisable to avoid restrictions in determining the proper applicants. And the best solution seems to be the right for complaints to be submitted not only by individual citizens, but also by organizations that protect the rights of certain groups of society. At the same time, the issue of the applicants' motivation remains relevant, and the violation of ethics by the media has to affect in one way or another the interests of an individual or legal entity applying to the body, which reviews complaints. An exception may be cases when the media is required to correct apparent factual, terminological, grammatical or similar errors. It is also appropriate to allow self-regulation bodies to act at their own initiative with assessments of compliance with the norms of journalistic ethics by certain media, as well as the respective negative trends in media environment as a whole.

As for the determination of potential objects of complaints, here too the approaches in the European Press Councils differ: from recognizing all the media operating in the country as part of the self-regulation system by default to limiting the review of complaints only against the voluntary signatories of a common Code and the regulations for its application. The use of “hybrid” approaches is a preferred solution for relatively new systems of self-regulation. In order to spread the principles of quality journalism in the media environment and public awareness of the possibilities of extrajudicial settlement of information disputes, it is worth reviewing complaints against the pieces of all media. Especially when they affect issues of public significance. At the same time, given the impossibility of ensuring an identical response to the judgments of self-regulation bodies on complaints from the signatories of the single Code and those media continuing to operate outside this system, it is appropriate to also differentiate the consequences. In the first case, there should at least be envisaged a publication of the judgment by the media, against which a complaint has been filed, and in the second case - its dissemination through all available information channels for shaping a proper public attitude with regards to violations of journalistic ethics.

# SOURCES OF FUNDING OF PRESS COUNCILS

The volume and sources of funding are important factors determining the efficiency of the work of Press Councils. The study of the experience of a number of European self-regulatory bodies leads us to the following picture<sup>4</sup>:

	<b>Budget</b>	<b>Approx. number of complaints</b>	<b>Number of staff working</b>
<b>Austria</b>	235,000 Eur	300	2 persons full time and 1 person part time
<b>Azerbaijan<sup>5</sup></b>	12,000 Eur	400-450	4 persons
<b>Belgium/Flanders</b>	200,000 Eur	70	1 person full time and 1 person part time
<b>Bosnia and Herzegovina</b>	160,000 Eur	500	3 - full time 3 consultants and 1 accountant
<b>Cyprus</b>	22,000 Eur	30-35	1 - full time and 1 - part time
<b>Estonia</b>	11,000 Eur	85	1 person
<b>Finland</b>	390,000 Eur	470	3 - full time and 1 - half time
<b>FYR Macedonia</b>	60,000- 80,000 Eur	100	3 persons
<b>Kosovo (under UNSCR 1244)</b>	70,000 Eur		4 persons
<b>Germany</b>	700,000 Eur	1800-2000	10 persons
<b>Ireland</b>	400,000 Eur	250-300	3 persons
<b>Montenegro</b>	30,000 Eur	45	1 person
<b>Netherlands</b>	165,000 Eur	120	2 part-time staff members: 1 secretary - 32 hrs/week + 1 secretary assistant - 18 hrs/week
<b>New Zealand</b>	161,000 Eur	185	1 person
<b>Norway</b>	850,000 Eur	400-500	5 persons
<b>Russia</b>	130,000 Eur	25-30	5 persons

<sup>4</sup> The initial data have been collected through a survey conducted in 2017 and updated in subsequent years.

<sup>5</sup> The data provided by the Press Council of Azerbaijan raise doubts among other AIPCE members.

<b>Serbia</b>	120,000 Eur	120	2 - full time, 2 - part time
<b>Sweden</b>	600,000 Eur	500-600	2 investigators (Press Ombudsman and deputy PO) and 2 administrative officers
<b>Switzerland</b>	300,000 Eur	80-100	Director (100%), Administrative assistant (40%)
<b>United Kingdom</b>	2,800,000 Eur	30,000	22 persons

As for the sources of funding, out of 39 members of the Alliance of Independent Press Councils of Europe (including **associates**), 22 are in a relatively stable financial condition.

- 11 of them are fully or mainly funded by the media (Denmark, the Netherlands, Norway, Sweden, Finland, UK, Estonia, Switzerland, New Zealand),
- 4 - fully or mainly by the state (Austria, Cyprus, Russia, Azerbaijan),
- 3 - in a mixed (media and state) way (Germany, Finland, Belgium),
- 4 more - by multiple sources, including various donor organizations (Bosnia and Herzegovina, Serbia, North Macedonia, Kosovo),
- The rest of the AIPCE members do not have stable sources and it is difficult to speak about any patterns in this sense.

The comparison of the above-mentioned data allows to draw several important conclusions:

- the greater the share of funding by the media, the higher the financial viability of self-regulatory bodies;
- the more often the advanced media self-regulation bodies receive complaints, the greater is their funding;
- the larger the staff of self-regulatory bodies, the higher is the number of complaints received (although here there may be a reversed interdependence).

At the same time, the history of Press Councils indicates several other circumstances related to the sources of funding. The independence of self-regulatory bodies may be questioned when their budget is replenished from one dominant source. In particular, the cause of the

crisis in the British Press Complaints Commission mentioned above, was the accusation of its biased protection of the interests of the media to the detriment of the public interest and the principles of good-faith journalism. In its turn, the dominant volume of funding by the state contains risks of additional mechanisms of control over the information sphere. If in case of the countries where governments have historically played a positive role in establishing media freedom and independence this risk is relatively small, while, for example, in the post-Soviet area the attachment of self-regulatory bodies to state funding creates or will sooner or later create serious problems.

**The experience of advanced European Press Councils in determining quotas for payments into their budget by the media is also noteworthy.**

- In Denmark, 50% of the budget is covered by the public broadcaster, 41% by the Association of Newspapers, and 3% each by magazine publishers, regional and local media, and the trade press.
- In Norway, 60% is paid by the Publishers' Association, 20% each by the Association of Editors and the Union of Journalists.
- In Sweden, 75% of the PC budget is contributed by the Association of Newspaper Publishers (90% of all complaints are filed against publications in newspapers), 5% - by the Magazine Publishers Association, 1% each - by the Union of Journalists and the National Press Club, while the rest is contributed by various foundations.
- In Ireland 80% is paid by national newspapers, 15% by regional newspapers, and each online media pays a fixed amount of 200 pounds annually.

On average, in Press Councils with regular funding, 80% of the budget is spent on personnel costs, 10% on office and 10% for other purposes. 65% of Press Councils pay the members of Complaints Commissions.

# MAIN CONCLUSIONS

**Composition of self-regulatory bodies** - A summary of the experience of the most advanced European Press Councils allows to conclude that the optimal composition of the commissions to review complaints, as a key unit of self-regulation systems, should include representatives of media industry (heads of media), the profession (reputable journalists) and the general public. Given the fact that when reviewing complaints, it is important to address them not only from an ethical, but also from a legal point of view, the presence of a lawyer knowledgeable in judicial practice in information disputes is a necessity for the composition of the commission. This can particularly be ensured through a quota allocated to representatives of the general public.

**Coexistence of different systems** - While the Press Councils and analogous bodies are the core of self-regulation systems, in many countries the institution of the national ombudsman, who, as a rule, interacts directly with the PC, has proved its efficiency. This can be seen in the aforementioned examples of Sweden and Ireland, the same practice exists in the Republic of South Africa. However, the concept of “National Ombudsman” should not be confused with the ombudsmen of individual media appointed by the management of the respective companies to act as mediators between the editorial office and the audience, resolve possible conflicts and respond to criticism. British “The Guardian” introduced the concept of “readers’ editor” for its ombudsman. As in the case of the Press Council, the “internal ombudsman” usually relies on the Code of Journalistic Ethics adopted by the media.

While in Europe Press Councils have become more widespread, in the US, for example, media self-regulation is carried out mostly through ombudsmen. Nevertheless, the two different systems do not contradict each other and can successfully coexist. In this regard, the example of Denmark is illustrative, where both an efficient Press Council and internal ombudsmen in all the leading media operate. Apart from going to court to resolve their dispute with a certain media, citizens here can choose between applying to the PC or the internal ombudsman. On the one hand, the two institutions compete, but, on the other hand, they complement each other. It is this kind of architecture of self-regulation system (the so-called “hybrid model”) that seems to be the most promising one for countries where the concepts of media accountability to the public are in the process of development or

introduction. These two institutions are designed to build public trust both in the professional media field as a whole (in the case of Press Councils) and individual media (in the case of ombudsmen).

**Co-regulation: pros and cons** - It is hard to expect that any institution of media self-regulation, created from scratch, is guaranteed to be a success. Therefore, “monopolies” at the initial stage of the introduction of media accountability systems may lead the process to a dead end. In particular, there are serious risks in attempts to establish a single Press Council within the framework of legislative regulation. Various forms of co-regulation successfully practiced in countries with strong traditions of a free and quality press (Denmark, Ireland) may lead to discrediting the model in other socio-political circumstances, with no traditions of democratic institutions and a well-established atmosphere of social responsibility.

At the same time, if there is constructive interest and good will, the state can play a certain role in the development of a self-regulation system. In particular, at the regulatory and legislative level, certain standards for relevant institutions, measures to encourage the participation of the media in initiatives aimed at introducing mechanisms of accountability to society may be enshrined. One of these measures could be the establishment of the office of the ombudsman in a public broadcaster, which would serve as a model for the media environment as a whole (Estonian experience). Another measure could be the assistance in the creation of a non-governmental Foundation to support independent and quality media, which would, inter alia, solve the issue of co-financing of self-regulatory bodies. At the initial stage, it would be acceptable to form several structures to act as Press Councils so that in the future the most viable ones remained. Such a precedent is observed, for example, in the UK, where, following the dissolution of the Press Complaints Commission, IMPRESS (Independent Monitor for the Press) and IPSO (Independent Press Standards Organization) have been competing for the role of its “successor”. Added to that, the UK citizens’ complaints against the broadcast media are reviewed by the national communications regulator Ofcom. The BBC has its own system for ensuring high standards of journalism.

**Voluntarily or “forcibly”?** - Along with the basic factors in the formation of media self-regulation system, the current study touched upon a number of specific questions, the answers to which are ambiguous, but important for choosing the best models, including in Armenia. One of them, in particular, concerns the determination of the circle of media that



are part of self-regulation. The experience of some countries (for example, Ireland, Finland, Spain, Great Britain, Serbia) shows that only those who voluntarily joined it are covered by the system, in others (Denmark, France, Cyprus) the powers of self-regulation bodies by default apply to all. At the same time, in many European countries where the principle of voluntariness is observed, the majority of the media have joined the self-regulation system. In the UK they can choose between the two organizations mentioned above. Russia has different mechanisms than all other countries: the Public Press Complaints Collegium does not have a Code and relies on universally recognized principles of ethics, accepts complaints against any Russian media that, in its turn, may agree to cooperate on a specific information dispute, which does not necessarily imply its continuation in the future.

**Incentives for engagement in self-regulation** - The existence of incentives for engagement in self-regulation is another essential issue. In Ireland, Great Britain and a number of other countries, the media that have signed the Code enjoy certain privileges when lawsuits against them are examined by courts. In Serbia, the practice of consultations with the Press Council is used when deciding on the state financing of a particular media. In the Spanish region of Catalonia, the signatories of the Code of Journalistic Ethics in the past benefited from the distribution of subsidies, while a similar possibility for the future is being considered in France. In Luxembourg, the Press Council is the body authorized by law to issue press cards, binding thus all the country's media to it. In Finland, Belgium, Cyprus and most other European countries, no privileges are envisaged.

**Policies to support quality journalism** - Given the development of the concept for promoting self-regulation/co-regulation included in the programme of Armenian government for 2021-2025, similar experiences in other countries were of particular interest. One of the forms of implementation of the official policy in the field of self-regulation is the recognition of self-regulation bodies at the legislative level (Denmark, Ireland and a number of others). In this regard, there's a specific situation in Great Britain, where the Royal Charter on Self-Regulation of the Press created a special independent Recognition Panel, but while IMPRESS appeared to be interested in recognition by this body, IPSO did not. A significant part of the British media industry has expressed concern over the introduction of the recognition procedure and as a result has chosen to be part of the IPSO system. In a number of countries state policy is manifested through financial support for self-regulation systems (Germany, Finland, France, etc.). The practice in the application of both forms of incentives - the official recognition and financing - is quite common.

**Should documents of bodies be published?** - There are also quite different approaches in the European countries regarding the publication in the media of codes and judgments on complaints related to them. The British IMPRESS practices the publication of all the mentioned documents for the media, which have joined its system. IPSO obliges to publish only those provisions of the Code that clarify the procedure for filing complaints, while the issue of publication of judgments is decided by the media itself. In Denmark, the publication of the Code is not mandatory, and in case of publication of judgments the Press Council makes a decision on a case-by-case basis. In Finland, Serbia and Catalonia only the judgments are required to be published. In Belgium, the publication of the Code is not envisaged, and as for the judgments, the Press Council expects the media to publish their main provisions. Almost the same approach is maintained in France. As noted above, the Russian self-regulatory body does not have a Code, and the publication of a judgment by the media, against which a complaint has been filed, is on an exclusively voluntary basis. The Cyprus Media Complaints Commission does not envisage any obligation to publish the mentioned documents.

**Conduct of journalists on social media** - The approaches of the Press Councils to assessing the conduct of journalists on social media also differ. In this regard, the members of the Alliance of Independent Press Councils of Europe can be split into three main groups. The first includes those that do not review complaints against pieces on social media. The second group includes self-regulation bodies that receive complaints against pieces posted only on the official pages of the media on social networks. The third one encompasses the Press Councils and analogous structures, which review complaints on any content on social media if the author is a user who identifies him/herself as a professional journalist.

**Self-regulation and transparency of the media** - The issues of transparency of owners and sources of funding, as well as the extent to which the self-regulation system can contribute to that are topical for Armenia. In most of the European countries, the topic of transparency is not on the agenda of Press Councils. However, a number of self-regulatory bodies require to be provided information that is important for their own activities. In particular, in Denmark, the publication of data on a managing editor and publisher in charge is mandatory.

**Fact-checking and self-regulatory bodies** - Taking into consideration the active spread of fact-checking platforms (checking facts disseminated by media) in the media space, as well as the contradictions that have recently emerged between traditional media and fact-checkers, there is certain interest in the self-regulatory bodies perceiving them as an object of their activity. Different approaches are practiced here even within a single country: IMPRESS allows for the possibility of modifying its regulations, which would enable to review complaints against the mentioned platforms. The other British organization, IPSO, categorically limits its activities to traditional newspapers, magazines and their online versions. This approach is shared in a number of other countries (Germany, Ireland). The Scandinavian countries see no reason why complaints against fact-checkers cannot be considered if they are perceived as part of the media space, which is a segment of the self-regulation system. The Belgian (Flemish) Press Council, at the time this study was being implemented, had already considered three complaints against fact-checking platforms, and the latter published the required amendments. The Council for Ethical Journalism and Mediation (Conseil de déontologie journalistique et de médiation - CDJM) of France looks at this issue through the lens of belonging of the object of the complaint to the profession, i.e. if the fact-checking platform is created by journalists or the piece is published in a media outlet, the issue may be considered. A similar approach is practiced in Russia: such a complaint can be reviewed if it is addressed to an organization registered in accordance with the Law of the Russian Federation on Mass Media.

**Attitude towards media violating codes** - The idea of sanctions against media, which violate the Code they have joined, is being raised in Armenia as part of discussions on the efficiency of self-regulation (co-regulation) systems. In rare cases the Press Councils have such a right, including financial penalties. At the same time, self-regulatory bodies are unable to make decisions on compensation for financial losses suffered by the applicant. Two British structures, in a sense, are an exception, as they may note in their judgments the propriety of awarding compensation by other bodies endowed with relevant arbitration powers.

According to the decision of its founder - the General Meeting of Participants of the Self-Regulation Initiative - the Media Ethics Observatory of Armenia starting from May 2021 has been mandated to review and release judgments not only against media, but also against officials on information disputes, where one of the parties are media representatives. As this study shows, none of the Press Councils operating in Europe envisages such a procedure.

At the same time, self-regulation bodies that attach great importance to the mission of protecting freedom of speech and information (Georgia, Luxembourg) may publicly express their position regarding the actions of government officials and politicians directed against these freedoms.

The coronavirus pandemic, the wars faced by countries whose self-regulatory bodies are members of the Alliance of Independent Press Councils of Europe have brought issues of ethical conduct in extreme situations to the forefront. However, the Codes traditionally describe the rules for working under “normal” conditions and do not stipulate additional restrictions or, on the contrary, tolerances for emergency situations. At best, journalists are advised to inform the audience about the restrictions affecting the content of their publications during an officially declared martial law or state of emergency (Press Council of Catalonia, Russian Public Press Complaints Collegium). Added to that, the media are radically reconsidering their editorial policy during the wars in which their countries are involved, the management of social media are discussing the possibility of changing their rules in the context of events in Ukraine. These circumstances force us to once again address the topic of targeted ethical standards for the work of journalists during emergencies.

**International cooperation to promote media self-regulation** - Further analysis of the international experience summarized in this study can contribute to the improvement of media self-regulation models both in Armenia, where a respective concept is being developed at the government level, and in other countries where systems of media accountability to society are in the making. As noted above, the Alliance of Independent Press Councils of Europe is the most efficient platform for exchanging practical ideas in the field of self-regulation.

AIPCE sets out the following core beliefs as underlying its activities:

- the regulation of editorial content in the media should be independent of government;
- the writing of Codes of journalistic ethics and their administration is the business of journalists and publishers, who take into account public feelings, and not the business of governments;
- media content regulation, whether national or regional in its coverage, should be based on nations differing cultures;
- it is not possible to operate a universal Code of ethics, and that the imposition of supranational Codes and regulatory organizations, either at the European or global level, should be opposed.

Along with AIPCE, a certain experience of international cooperation in promoting institutions of self-regulation in the field of journalistic ethics has been accumulated in the Network of Media Self-Regulatory Organizations (NMSO), which brings together relevant structures from seven post-Soviet countries. The NMSO was established in 2011 as a kind of “section” within the AIPCE, designed to “elevate” the self-regulation bodies of the participating countries to the level of the leading European Press Councils. One of the innovative forms of interaction within the Network has been the practice of reviewing cross-country complaints against the media by an advisory commission composed of representatives of all the participating countries, and developing appropriate opinions.

**Dependence on related fields** - This and previous studies of self-regulation experience, carried out at national, regional or international levels<sup>6</sup>, indicate the importance of a comprehensive approach to strengthening the quality media segment. Accordingly, the development of the self-regulation system is largely conditioned by the improvement in related fields. In particular, the perception and assessment of the benefits of self-regulation

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<sup>6</sup> Olga Mamontova, Press Council in Europe: analysis of main parameters of activity, classification, models (2013) - <https://presscouncil.ru/teoriya-i-praktika/knigi-i-stati/1915-sovety-po-presse-v-evrope-analiz-osnovnykh-parametrov-deyatelnosti-klassifikatsiya-modeli>; Adeline Hulin, “Statutory media self-regulation: beneficial or detrimental for media freedom?” (2014) - <https://core.ac.uk/download/pdf/45685055.pdf>; Media self-regulation in South East Europe: guide to best practices for the digital age (2019), <https://unesdoc.unesco.org/ark:/48223/pf0000367835.locale=fr>

by the public are directly related to the level of media literacy of the people. A progressive system of media legislation and high-quality jurisprudence on information disputes contribute to an environment in which self-regulation can occupy its niche and harmoniously interact with state regulation. The enhancement of journalism education helps to improve professional standards in the media environment and allows the self-regulation system to pursue greater levels of ethical expectations from media representatives. The state policies in relation to the media market aimed at building civilized relations among its subjects sets the stage for the development of independent media, which, unlike biased propaganda media, tend to operate within the frames of agreed rules. And the experience of the European Press Councils confirms that self-regulation succeeds where the listed related fields have also proved their sustainability. This first of all applies to the Scandinavian countries, Great Britain, Belgium, the Netherlands, Germany... It is their models of media self-regulation that deserve particular attention.