

Vasilis Vasilopoulos - Katharine Sarikakis

Ethical Media Governance

a handbook for the Industry



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EXECUTIVE SUMMARY

This publication provides a guide for ethical self-regulation, by design and by default, of the media that includes documentation of self-regulation in the form of adopting an ethical and total quality management system. The publication, which is in line with the European strategy as expressed in the proposal for Regulation EMFA [(European Media Freedom Act) and amending Directive 2010/13/EU] of 2022 and Recommendation (EU) 2022/1634 of 16 September 2022, is intended for all types of media organizations and contains guidelines for establishing ethics and quality standards, assurances of transparency and independence of media and journalists, counseling and a toolbox, which can improve media governance as well as content quality.

Vasilis Vasilopoulos, Katharine Sarikakis

SUMMARY

This publication addresses stakeholders in the Media Industry and corporate and journalistic managements of media organisations of all types, thematic frameworks, sizes, and technological integration that distribute content through web applications and platforms.

The handbook strengthens documentation and addresses the need for self-regulation with ethical and quality standards for ethical media governance. It presents ways in which a Total Quality Management System can be developed to provide a constructive response to the challenges of transparency, credibility, and independence faced by the media industry. It also includes a self-assessment system for compliance with the Code of Conduct.

The first part of this book assesses the current context consisting of the environment, problems, and risks for the media industry and their impact on society. It revisits relevant European policy initiatives on press freedom and independence, regulatory regimes in the online media ecosystem and digital platforms, contemporary challenges such as misinformation, lack of transparency and accountability, and the risks to freedom of expression and, thus, to democratic citizenship.

The second part of the thematic and conceptual framing examines the very concept of ethical governance and the relationship between self-regulating ethical frameworks and soft law. It situates the book within the context of the concepts of media ethics and, in particular, of the relationship between journalism and ethics.

Based on the first two parts, which set out the rationale and analysis of ethical media governance in organisational management, parts three and four provide an overview of existing practices of such applications, while part four offers a detailed yet flexible framework that organisations can adopt. Part three presents some of the important quality assurance initiatives in the media industry and international standards that could be adopted for media governance. Each of the available International Standards is auditable, and some are certified by independent accredited bodies as evidence of compliance with the principles of social responsibility. Part four presents proposals for adopting a roadmap of ethical governance, establishing ethical standards and the rationale for the “ethos”

standard, an EMGMS, and appropriate technical and organisational measures for ethical self-regulation by design and by default. Included are methods of content quality control and compliance with ethical standards, suggestions for upgrading journalistic competence, and good practices for interacting with the public.

Methodological procedure

If the answer to questions about safeguarding press freedom is independence, the current study attempts to substantiate it by focusing on the ways in which one can strengthen the position of a self-regulating medium against forces that exert disproportionate pressure to influence it (e.g., powerful interests as well as regulatory or governmental authorities).

Exploratory research methodology was used to investigate the translation of complex requirements into media governance in practical “how to” expression as an issue, which is currently under continuous transformation and being shaped by new circumstances. For this reason, the underpinning theoretical framework concerns understandings of the concept of self-regulation as soft law, the standardisation of media governance, and journalistic ethics as an ethical standard.

The current publication presents the “ethos” involved in developing an ethics and quality management system in digital media. The project was developed in its final form by Dr Vassilis Vassilopoulos, an associate member of the research team of the Jean Monnet Centre of Excellence and Dr Katharine Sarikakis, Director of FREuDe and Full Professor at the University of Vienna.

The study explores the ways in which the requirements of a Code of Ethics as a process can complement the requirements of a Quality Standard based on the ISO 9001 methodology. This way, it can ensure that the ethical governance of a medium is a common binding purpose within an organisation, while roles are kept distinct between corporate and journalistic management to enhance editorial independence. These provisions are embodied in a framework of requirements that encompasses a set of assumptions, concepts, values, and good practices that offer a pragmatic yet ethical approach while responding to the debate on regaining credibility, editorial independence, and the ethical advantage of legitimate business activity of media organisations.

The constitution, interoperability, and documentation of the Standard “Ethical Media Governance Management System, **ethos**” are based on a set of international standards, such as ISO 9001, 27001, 27035, 22301, 45001, and 31000, as well as the Code of Ethics (2023) of the Hellenic Association of Internet Publishers, which was

developed in 2016 by the Athena Research Centre. The corporate framework of the single standard can be inspected (based on international inspection standards) and certified by independent accredited bodies. As a process, the ethical standard can be assessed internally or within and by a Press Council, so compliance with the ethical standard is a non-negotiable condition of the medium's compliance with the requirements of "ethics".

The scope of such an Ethics and Quality Management System is clear in terms of certification specifications, application boundaries, and checkpoints, thus allowing its adoption and implementation by any media organisation, regardless of size, orientation, and business activity in general. *Most importantly, it does not interfere with the fundamental principles of free journalism.* The scope of application can be defined as the whole range of corporate processes - from the establishment, organisation, and operation of a publishing group or organisation to the completion of the information processing life cycle, i.e. journalistic editing and final publication of content.

In this respect, the spirit and the letter of European policies (regulations, directives, recommendations and guidelines) have been taken into account, such as the requirements put forward by the institutional tools of the Digital Single Market to cover all sectors up to those recently described in the Bretton¹ and COE² recommendations on the safety of press workers, the policies against SLAPPs or the policies proposed in EMFA and REC 1634/2022³.

In this way, the content of the above-mentioned constitutional interventions of the EU and the reports of the European Parliament on the protection of press freedom is enriched and more precisely defined with institutional initiatives and incentives for self-regulation. The 'ethos' (EGMS), which is more of a business tool and differs from other activist-type approaches, complements the toolbox of existing Management Systems that could be chosen by European media (ISAS BCP9001, RSF JTI, Ethical Journalism Network audit), proposes methods for monitoring compliance with journalistic principles and public satisfaction, measuring quality content objectives, weighing public interest, data processing, checking the validity of information, avoiding plagiarism, distinguishing between informative and

1. COMMISSION RECOMMENDATION (EU) 2021/1534 of 16 September 2021 on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union

2. Recommendation CM/Rec(2016)4[1] of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors. (Adopted by the Committee of Ministers on 13 April 2016 at the 1253rd meeting of the Ministers' Deputies)

3. COMMISSION RECOMMENDATION (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector

promotional content, adopting policies for the exploitation of intellectual capital and upgrading journalistic skills, methods of engaging corporate management and adopting periodic public value reporting.

This standardisation presents the importance of fulfilling the public mission, how to address the challenges of opacity and misinformation in the Digital Era, identifying the risks and opportunities of using technology with assistive and/or artificial intelligence tools, as well as the value of returning to the roots of journalistic ethics as a reinforcing tool for public and stakeholder satisfaction. By fulfilling the EGMS “ethos” requirements, the media organisation pursues the objectives of producing high-quality content and serving the public interest.

Dr Vassilis Vassilopoulos is DPO in Greek public broadcasting media at ERT SA and, since 2006, has been working as Director of Digital Media Content at ERT SA. The project’s implementation required the author to be certified by the international organisation IRCA as a lead inspector of quality management systems according to ISO 9001:2015. To serve the purpose of completeness of approach, the integration of requirements from the above ISOs was considered, including those for information security and incident response, business continuity, and occupational health and safety.

Professor Katharine Sarikakis is the founder and director of the Media Governance and Industry Research Lab at the University of Vienna since 2011, the Director of the Jean Monnet Centre of Excellence FReuDe, and is a Visiting Fellow at the University of Witwatersrand, South Africa, and has held, among others, the Santander Chair of Excellence at UC3M 2018-2019, Spain, as well as a visiting Senior Fellow at the London School of Economics and Political Science in 2018. She is a consultant to international organisations such as the OSCE, European Union institutions, and NGOs and served as Chair of the High-Level Expert Committee on the Report on Quality Journalism and the resolution adopted by the Council of Europe.

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ABOUT THE PUBLICATION

This publication addresses stakeholders in the media industry and especially corporate and journalistic managements of media organisations of all types, thematic contexts, sizes, and technological integration in the digital era, which distribute their content through various web applications and platforms.

The study answers how the rules of a detailed Code of Journalistic Ethics, which considers the ethical dilemmas of using the Internet, complement the requirements of an ISO 9001-based Quality Standard. The exploration concerns how this integration would ensure that distinct roles between corporate and journalistic management can be maintained to guarantee editorial independence. These provisions are embedded in a framework of requirements that embodies a set of assumptions, concepts, values, and good practices, which respond to the debate on the recovery of credibility, editorial independence and fair business conduct of media organisations.

ACRONYMS

AFP	Agence France Press
AGI	Artificially Generated Intelligence (artificial general intelligence)
AI	Artificial Intelligence
AIPCE	Alliance of Independent Press Councils of Europe
AP	Associated Press
CoE	Council of Europe
DSA	Digital Services Act
DSM	Directive Single Market
EMFA	European Media Freedom Act
EGMS	Ethical Media Governance Management System
EMS	Ethics and Quality Management System
EU	European Union
GPT	Generative Pre-trained Transformer
ICT	Information and Communication Technologies
IPSO	Independent Press Standards Organisation
JTI	Journalism Trust Initiative
KPI	Key Performance Indicators
MEDIA	Mass media
NLG	Natural Language Generated
NLP	Natural Language Processing
NGOs	Non-Governmental Organisations
OSCE	Organisation for Security and Co-operation in Europe
OTT	Over the Top
RSF	Reporters Without Borders

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PREFACE

In the era of information overload and technology rush with a special focus on communication, making their comparison and importance indistinguishable, citizens, societies, public and private institutions, as well as business entities are looking for accurate information to make critical decisions.

The generalised crisis of confidence in fundamental principles and values, institutions and institutions, also affects the media in Europe and the world. This crisis of credibility is related to the economic, social, and institutional crises, which have caused a serious relaxation of ideals and a weakening of support for democracy in the face of survival and self-interest.

In this context, the Media, as industries and as institutions, are looking for solutions both for business survival and new economic models, as well as strategies to enhance business capacity to capitalise on the benefits of technology. In this process of transformation, standardised procedures introduced by self-regulatory initiatives in the media industry play a most decisive role, as they can guarantee improved operations, healthy competition, business success, and the fulfilment of public interest, and public expectations. For the media, the fundamental standard is the Code of Conduct. Ethics should therefore govern any standard system of self-regulation from the outset.

With this in mind, in the European Union (EU), references to quality management systems in the Media in the draft MFA Regulation (2022) and EC REC 1634 (2022) are explicit. The spirit of the law in the European texts treats ethics as soft law for which self-regulation is required by mandatory legislation and refers to co-regulation. This is the model adopted by the European Commission for almost all Digital Single Market Regulations. It calls for self-regulation with independently inspected standards.

The EU's pioneering role introduces the concept of self-regulatory standards and the value of ethics and quality certifications (EMFA⁴, DSA⁵, DMA,⁶ and Code Against Misinformation⁷) as proof of compliance with the requirements of serving the public interest in a single digital market. Recommendation 1634⁸ (2022) refers to good practices and the draft EMFA Regulation to a Management System model, conceptually defining media self-commitment. In particular, it refers to the Journalism Trust Initiative (JTI) system of the non-profit organisation, Reporters Without Borders, which defines itself as neither a trade union entity nor a representative of media companies.

In this period of rapid development of algorithmic content production, the regulation of artificial intelligence in the direction of protecting authentic information, freedom of expression, privacy rights, and intellectual property rights becomes vital. Natural language generation (NLP) applications with corpus content from the media and public or closed data threaten to flood the internet with misinformation, fantasies, prejudices, paraphrases, and violations of the legal framework for personal data. It goes without saying that the regulatory initiatives under discussion should include ethical journalism in the institutional shield of legitimacy, as responsible media, as pylons, and serve the fundamental principles of human rights and democratic citizenship. In any case, whether the technological landscape of robotic content production is regulated or remains unregulated, the role of the media is very important in checking the validity of information, the accuracy of the news, protecting the public from asymmetric information and protecting intellectual rights in the name of the public interest.

4. Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a common framework for media services in the internal market (European Media Freedom Act) and amending Directive 2010/13/EU <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022PC0457>

5. Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2065&qid=1666857835014>

6. Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R1925>

7. European Commission. (2022). The Strengthened Code of Practice on Disinformation 2022. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/european-democracy-action-plan/strengthened-eu-code-practice-disinformation_en

8. Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1664779252884&uri=CELEX%3A32022H1634>

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FOREWORD

By THEOCHARIS PHILIPPOPOULOS

President of the Association of Internet Publishers of Greece (ENED)

In 2015, ENED, despite being an association of private digital media, sought a common ethical compass of journalism for its members. It approached the Athena Research Centre and asked for a mapping of ethical standards with the aim of drafting a Code of Ethics for its members. Since 2016, ENED has adopted the Code, as a dynamic code, which is continuously updated, including every ethical aspect that emerges in the era of online journalism.

This Handbook proves that ENED's investment in principles and values has paid off, as the authors present the value of self-regulation, the EMGMS ethics and quality standard and the ethical standard "ethos".

Over time, the public has expected and demanded unbiased information from the media with respect for the reader and honest journalism without agenda.

Today, digital media dominate as platforms or with their content and the speed and quality of information, they influence the news. They provide citizens, businesses, and society with the information necessary to make decisions in the public sphere. The technological deluge is making these challenges grow exponentially and is creating a need for the digital media industry to set appropriate standards to meet their growing societal role. In today's ecosystem, media must consider ethical and quality governance and the standardisation of their corporate and journalistic cultures.

This is the direction the European Union is moving in with the Media Freedom Act, talking about total quality management systems and standardised measurement systems, focusing on independent journalism as a shield of the democratic acquis that online media can guarantee.

As the great editor of the Manchester Guardian, CP Scott (1021), wrote in an essay entitled "One Hundred Years":

"A medium has two sides. It is a business, like any other, and it must collect revenue to survive. But it is much more than a business; it is an institution. (...) It is, in its own way, an instrument of governance. It influences people's minds and consciences. It can

educate, stimulate, help, or it can do the opposite. It has, therefore, a moral as well as a material existence, and its character and influence are mainly determined by the balance of these two forces."

INTRODUCTION

MEDIA GOVERNANCE - DO STANDARDS MATTER?

As the media industry is developing, transforming, as Cherubini (2022) states, into a technology-intensive industry transforming traditional newsrooms into hybrid units of content production and distribution, i.e. within integrated newsrooms and with the convergence of distribution media, there is an increasing interest in common Ethical and Quality Standards and criteria for inspection, measurement, and evaluation of this business activity and of journalism through this evolution. The most recent debate concerns the need to regulate natural language production technologies from artificial intelligence and machine learning, while both news content production and journalism as a profession are facing technological advances. For now, there is a flood of content with errors, biases, discrimination, misinformation, and speculation from the answers of the language models algorithm. However, it is significant that in recent years, robotic production of informative content has been applied in major media houses and especially news agencies, as for example, the Associated Press (AP), Agence France Press (AFP), and Reuters. The issue lies in the ability of Artificially Generated Intelligence (AGI) to be fed by large language models capable of producing narrative text at a large scale. In addition, there is a serious issue of intellectual property rights of educational data in applications such as those of OPEN AI, Google, and other platform giants. These matters remain currently unresolved, whether the user, through prompts, provides intellectual property and personal data, whether the machine has by responding the ownership of the copyright, and whether educational data in these applications is illegally collected and processed, as it is owned in the form of protected intellectual work by natural persons and entities.

Under these conditions, journalism and the media see the threat and weigh the risk, not entirely confident that the machine cannot replace authoritative, ethical, quality and independent media, as well as credible investigative journalism. However, this is precisely what is at stake in this era, and that is the reason why the framework of strong industry self-regulation is being sought.

According to Ytre-Arne and Moe (2021), scrolling news requires a special

approach to new ethical issues, and therefore it is particularly important to harmonise with ethical standards, such as those adopted by Press Councils in European countries. The role of the Councils is to award grades of credibility to companies that meet the requirements of an ever-improving Code, to assess the response to any breaches of ethical principles by members, to set up an intermediate arbitration mechanism to reduce the risk to companies and to enhance cooperation between members. It is indicative of the importance of ethical governance of the media and compliance with common standards that media in many EU countries are active in self-regulating through Press Councils either to adhere to ethical principles and to influence or counter pressure from governments and regulators. The Alliance of Independent Press Councils of Europe (AIPCE) network,⁹ which is an Alliance of 21 Independent Press Councils of Europe and eight observer members, has as its statutory objectives the independence of content from governments, cultural diversity, ensuring that ethical standards and especially Codes of Ethics are the sole responsibility of journalists and publishers and most importantly that the Code of Ethics cannot be supranational. The data from the activities of the Press Councils document the importance of a common approach towards the regulatory authorities, coordination in common value standards, and the need to maintain in each country ethics that are in line with cultural specificity. Digital ethical challenges, awareness and sensitisation of journalists, and self-regulatory bodies in each country, and especially in the era of robotics adoption, Artificially General Intelligence (AGI), and Natural Language Generation (NLG), the diversity of action of national press councils, compound to a larger set of challenges in cover the distance from the press councils' mission to its fulfilment. In particular, as the Alliance states, the function of Press Councils in Europe is not well understood; there is a lack of public information about them, there are differences in funding and staffing, and some of them have a lobbying role vis-à-vis regulators and governments.

The media industry is different from any other industrial production, as the product is not standardised and the same every time, but depends on the commitment of the management, the mission statement, principles and values of the organisation, intrinsic and extrinsic factors that affect its operation, pressures from stakeholders, information, and facts themselves, journalistic competence and adherence to ethical governance and journalistic ethics. This means that production in a media organisation is already affected from the start of the process, escalating the pressure at each new stage and being affected even more until the

9. AIPCE (2023) <https://presscouncils.eu/index>

content is released to the public. Confirmatively, Olkkonen (2018) argues that the integration of corporate and journalistic responsibility is related to the corporate social responsibility of Media.

Based on the above and the assumption that the media industry is different from any other, it should become clear from the design of a Media Management System Standard that the quality requirements of corporate governance are interwoven but do not include the specific requirements of the Ethical Standard, as this should be considered solely as a requirement of media management and should be reviewed separately. Therefore, the integration of ethical and quality requirements does not mean that ethics appear in the Model Management System as one of the required processes but must universally influence governance as a complementary soft law. The ethical requirement for journalism is reviewed and confirmed by the Ethics Officer of the journalistic management, so that the intervention of corporate management in the newsroom is not taken for granted. Evidently, content produced with respect to ethics is perceived as quality content.

The key variable could be quality journalism and, by extension, the quality of the content produced and transmitted by the media. The variation of values \pm in a metric system for quality content is entirely dependent on the public value of this produced content based on fundamental journalistic principles and key performance indicators (KPIs), such as the relevance of the content, its thematic framing, professionalism in editing and diversity with the inclusion of opinions, ideas, and positions. In other words, whether it meets and satisfies the needs and expectations of stakeholders and ultimately serves the public interest.

Under these circumstances, the exercise of defining stable standardisation methods is a difficult mathematical and philosophical issue to resolve. The dual nature of Standards as measurable and qualitative outcomes, is related to the nature of the industry and the nature of the journalism profession, as on the one hand, inspectable and measurable business indicators are considered evidence, and on the other hand, evidence of quality is sought by monitoring compliance with the ethical values that bind journalism in general, as well as the relevant statutory guidelines and corporate ethical standards.

Regarding the business governance of the media industries, the common rules laid down by laws and regulations of the supervisory authorities may exhaust their limits without necessarily ensuring that the corporate purpose includes serving the public interest or management's commitment to ethical journalism. Teleologically, as experience shows, no action by regulators is sufficient, and a regulatory policy is wrong if it forces or expects corporate management to interfere with content by

restricting journalistic independence or turning journalistic editing into a harness for public relations.

At the same time, the one-sided approach of regulators tends to take up much of the routine of corporate governance to the point of creating strong pressures and influences due to bureaucratic requirements. Especially when media organisations do not develop self-regulatory initiatives and standardisation, they find it difficult to protect even a minimum level of independence while maintaining their autonomy, let alone regaining the moral high ground. According to an OSCE guidebook (Haraszti 2018), self-regulation of the media is positive for the press because it helps to maintain the credibility of the media. Self-regulation helps to prove to the public that free media are not irresponsible and protect the right of journalists to remain independent and to be judged for their professional mistakes, not by the authorities but by their professional community. For the public, self-regulation is beneficial because citizens demand guarantees about the value of information. Codes of conduct provide a guarantee of editorial standards. Moreover, self-regulation of the media is an attempt to enforce the political culture of democracy, regardless of political forces and pressures. By and large, media self-regulation can protect editorial freedom, minimise state interference, promote media quality, demonstrate media accountability, and improve the relationship with the public. Given the technological environment in which the media operate, it could be proportionally argued that self-regulation should include a strong ethical standard for the protection of independent online journalism, internationally accepted standards for the quality of primary digital content, as well as standards for the management of copyright, privacy, and information security technologies.

Ethical Standards require that guidelines be set from the outset and that the journalistic management oversees their application at every stage related to the independence of the newsroom, the protection of sources, the weighing in favour of the public interest, and the satisfaction of the most important stakeholder, the public. According to Hammarberg (2011), the Commissioner for Human Rights of the Council of Europe, the media industry, to address the problems that encourage a culture of unethical activity in the newsroom, needs to develop a system of effective self-regulation - based on a code of conduct and a common mechanism for receiving and addressing requests for correction and complaints, for example through an ombudsman or a media council. This means that adherence to ethics can ensure more vital 'space' for the governance of the medium than that occupied by the interest of its small or large audience, as reflected in readership, traffic, audience, and viewership.

Even more vital space in the public sphere is ensured by autonomy, independence, and governance based on the successful implementation of Quality, Business Continuity, Internal Knowledge Management, Data Governance, and Information Security Standards. The coexistence of all the Standards in a self-regulatory Ethics and Quality Management System, with ISO 9001 as the development axis, can guarantee the achievement of the objectives pursued by the Media organisations and the moral advantage attributable to the pillar of public life, which, under the Fourth Estate framework controls public affairs. The importance of Standards is highlighted by the implementation of governance systems, such as those developed by the Ethical Journalism Network (EJN), which is a simple tool that can help media outlets to monitor their own performance and help develop ways to improve public and market confidence.

Of course, the issue of self-regulation has two perspectives in the public debate. There are arguments for and against self-regulation of the media in terms of their freedom. According to Hulin (2014), one perspective believes that taking regulation out of the hands of governments is beneficial to media freedom, while the other view is that the lack of legal protection and recognition of self-regulation as well as unclear boundaries, may contribute to the suppression of free speech. In this light, coregulation, i.e., the legal recognition of self-regulation to help ensure the independence of the institution from the interests of the media industry and to prevent the 'privatisation of censorship', is open to question. Legislative recognition can also provide incentives for the media to participate in the voluntary system of media self-regulation. However, there is always the risk that the recognition of self-regulated media by state authorities in illiberal countries that attempt to turn self-regulation into a compulsory system controlled by political interests will be problematic. In countries where the culture of an independent press makes sense, such as the UK, the Independent Press Standards Organisation (IPSO)¹⁰ badge demonstrates that member publishers are demonstrating their responsibility and commitment to professional standards.

An important advantage of standardisation can be to avoid imitation of both the method of distribution and the content itself. Lack of originality may or may not satisfy, or hinder, commercial policy, but if it prevents the universal reception of information, it may be seen as disregarding part of the audience for whom, by design and by default, content should be produced based on their interests.

But the process of incorporating a common Standard does not necessarily lead

10. Independent Press Standards Organisation (IPSO). <https://www.ipso.co.uk/>

to homogeneity and imitation, nor does it justify the production and distribution of identical content. It has the potential to illuminate an organisation's strengths and highlight its intellectual capital. It could lead to processes that add value to the final content, mainly because each medium has or claims to engage its own audience, and harnessed journalistic skill can prove to be a jewel in a medium's crown.

One indicator of success in the world of digital redistribution and search engine technology platforms is audience loyalty, which is a critical metric for all digital platforms that publishing organisations work with on a global scale. This leads to investments in technological modernisation and standardisation in entities that meet the requirement for strong management will for digital modernisation. The possibility of weak intent and a significant lack of resources leads to fragmentation and digitisation initiatives without principles and coherence, with a direct impact on the quality of journalism.

In the integration of a Standard and certification of an Instrument based on specific requirements, high-importance issues such as competent management, good governance, the public value of the Instrument, risks and opportunities, hidden functionality problems, the use of internal knowledge, the richness that can be hidden in public data, smart marketing, innovation ideas, and initiatives and the opportunity for the Organisation to lead the competition are highlighted. In general, Standards can support organisations:

- To contribute to the creation of quality news.
- To provide citizens, society, and the economy with accurate information to form an authentic public opinion and make decisions of vital interest.
- To defend fundamental principles and values, such as democracy.
- To complete via certification the set of quality strategic objectives.
- To reflect via certification the overall performance evaluation.
- To distinguish between promotional and informative content by highlighting their difference.
- To protect information, resources, and information systems.
- To build strong foundations for business continuity.
- To help the public to distinguish between opinion, truth, and falsehood.

The fact that the EU shares this approach and is leading the way for the media is considered particularly important both for the independence of the organisations and for addressing the contemporary challenges of transparency, accountability, ethical journalism, misinformation, plagiarism, strategies to intimidate journalists and, above all, credibility, which is the currency of value in this industry.

The structure of the Handbook

The Handbook aims to strengthen the documentation of the need for self-regulation with ethical and quality standards for the ethical governance of the media. It presents a way to develop a Total Quality Management System, which can provide a constructive response to the problems of transparency, credibility, and independence that the industry faces. At the same time, a system of self-assessment of compliance with the Code of Conduct is included.

The first part critically maps the current state of the art, problems, and risks for the media industry and their impact on society. It provides an overview of European policy initiatives for press freedom and independence, regulatory regimes in the online media ecosystem and digital platforms, contemporary challenges, such as misinformation, lack of transparency and accountability, and risks to freedom of expression and, thus, to democratic citizenship.

The second part examines the concept of ethical governance and the relationship between self-regulatory ethical frameworks and soft law. And applies this to an analysis of the concepts of media ethics and especially journalism.

The third part presents the most important Quality Assurance initiatives of the media industry and the International Standards that could be adopted for media governance. Each of the International Standards is auditable, and some are certified by independent accredited bodies, as they constitute evidence of compliance with the principles of social responsibility.

Part four builds on the analysis carried out hitherto to present practical and concrete recommendations for the adoption of ethical governance, detailing the ways in which to establish ethical standards and the Ethics and Quality Management System “ethos” (EGMS ethos), as well as appropriate technical and organisational measures for ethical self-regulation by design and by default. Good practices for measuring content quality are included. Methods for monitoring compliance with ethical standards, recommendations for upgrading journalistic competence and good practices for interaction and audience satisfaction are also provided.

The Annex sets out the EGMS “ethos” as set up to meet the requirements of an auditable and certifiable Ethics and Quality Management System in media governance.

Methodological procedure

This study uses exploratory research and regulatory framework analysis. It involved interviews with resource individuals and stakeholders, comparative

and analytical study of existing standards, and a study of the state of the art in order to map, identify and define values in the media sector. To develop the specific recommendations, the study also relied on the synergy of proposals and quality frameworks of management systems with ISO logic, thus attempting a combinatorial and transformative self-regulatory approach. The theoretical framework on which the value criteria of the framework as developed here relies is related to the relevant literature on self-regulation, governance standardisation, media ethics, and journalistic ethics.

The constitution, interoperability, and documentation of the “Ethical Media Governance Management System, **“ethos”** are based on a set of standard references of international standards such as ISO 9001, 27001, 27035, 22301, 45001 and 31000, and the Code of Journalistic Ethics of the Online Publishers Association Greece compiled in 2016 by the Athena Research Centre (ENED, 2016). Both the corporate and the ethical framework of the single Standard can be inspected (based on international inspection standards) and certified by independent accredited bodies in such a way that compliance with ethics is a non-negotiable condition of the medium’s compliance with the requirements of “ethics”.

The scope of such an Ethics and Quality Management System Standard is non-prescriptive as to its extent and scope. It is clear in terms of certification specifications, application boundaries, and control points, thus allowing its adoption and implementation by any media organisation, irrespective of size, orientation, and business activity in general. Most importantly, it does not interfere with the fundamental principles of free journalism. The scope can be defined as the entire range of corporate processes - from the establishment, organisation, and operation of a publishing group or organisation to the completion of the life-cycle processes of information, i.e. journalistic processing and the final publication of the content.

This standardisation presents the importance of fulfilling the public mission, the method of addressing the challenges of opacity and misinformation in the digital age, the recognition of risks and opportunities, and the value of returning to the roots of journalistic ethics as a reinforcing tool for public and stakeholder satisfaction. By fulfilling the EGMS **“ethos”** requirements, the Organisation is pursuing with claims the objectives of producing high-quality content and serving the Public Interest.

Delimitations

The study does not include Systems and Standards that do not follow the ISO model and good practices from all over the world, as it was mainly based on the European standardisation frameworks.

Part One

MEDIA CHALLENGES
and the
EU'S REFORMIST ROLE

The challenges, problems, and risks for the media industry and their impact on citizens, society, and democracy are at the top of the EU's list of concerns. The European initiatives on media freedom and independence, regulations, Directives and Recommendations in the ecosystem of online media and digital platforms aim to provide an appropriate response to contemporary threats such as misinformation, the unethical exploitation of asymmetric information through advanced technological capabilities, lack of transparency and accountability, and risks to freedom of expression. This part surveys European legislative initiatives and examines their effectiveness and efficiency, in particular with regards their focus on issues of misinformation, personal data, safety of journalists and intellectual property rights in the age of artificial intelligence.

The democratic constitution is a fundamental European value, and the protection of fundamental human rights that it stands for is equally essential to ensure the proper functioning of the EU Member States. However, in this era, democracy in the EU faces challenges, mainly the rise of extremism, misinformation and a sense of distance between the people and their elected representatives. The conditions under which our societies enjoy the freedom of creativity, exchange of ideas and responsible information, which are central pillars of democracy, are increasingly determined by communication and information. The importance of accurate and independent information is obvious since, among other things, citizens can be more fully informed about political and social events through reliable information and make informed political choices. In this light, ensuring the freedom and independence of media organisations and the accountability of political actors are two key elements of democratic systems. Over time, the media industry (media organisations - media providers and journalists) has taken self-regulatory initiatives to mitigate and address challenges. These initiatives include voluntary self-monitoring practices and adherence to internal procedures, freely chosen to suit the specific needs of each organisation. However, despite existing and possibly isolated self-regulatory efforts that lead to voluntary compliance by media organisations and their governing structures, the freedom of media worldwide is increasingly restricted, subjected to either unfair commercial influences or state interference. This is also the conclusion of the Rule of Law Report 2022 (COM 2022)¹¹ and the

11. European Commission EC COM(2022) 500 final. <https://eur-lex.europa.eu/legalcontent/EN/TXT/?qid=1658828718680&uri=CELEX%3A52022DC0500#document2>

Mapping Media Freedom¹², about the decline of press freedom across Europe. Therefore, the implementation of media self-regulation in practice, if not backed up by a reform friendly will at the Union level, is not sufficient to effectively limit and address the current threats to the sector. These include, but are not limited to, lack of transparency or concentration of ownership, dependence on large content sharing and advertising platforms, the decline in content quality, hate speech, misinformation and lack of independence and protection of journalists. Drawing on relevant recent studies such as the Media Pluralism Observatory report¹³, the EU is attempting to respond to challenges in the global technological and media landscape by exercising its planetary role. EU Regulations, Directives and Recommendations, as well as the Council of Europe's guidelines, aim to have a decisive impact on both the digital economy and the media industry, setting rules and limits and promoting rights and conditions for healthy business development. In support of what is proposed under the European Media Freedom Act¹⁴, the European Commission is deepening the ethical governance of the media with a radical proposal for self-regulation through Standard Management Systems. The European legislative initiative is about self-regulation that takes on co-regulation characteristics. In essence, the EU promotes ethical issues by highlighting the importance for society and democratic governance of each dimension of the concept ethics as defined by Aristotle and Plato. In principle, freedom of the press and freedom of expression are widely accepted fundamental values. The objective value of justice for society must be defined through a set of socially acceptable rules, including respect for citizens and the democratic representative system of government, social responsibility in a conscious and binding manner, honest communications for social cohesion.

12. Mapping Media Freedom. <https://www.mappingmediafreedom.org/>

13. Centre for Media Pluralism and Media Freedom (2022) *Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey in the year 2021*. European University Institute. Retrieved from: <https://cmpf.eui.eu/mpm2022-results/>

14. European Commission. (2022, September 16). European Media Freedom Act: Commission proposes rules to protect media pluralism and independence in the EU: https://ec.europa.eu/commission/presscorner/detail/en/ip_22_5504.

THE PROPOSED EMFA REGULATION

According to the European Commission, the media industry is part of the ecosystem of the cultural and creative sectors¹⁵. Their services are essential for economic freedoms and fundamental rights, including equality¹⁶. Independent media help to shape public opinion and help citizens and businesses to form opinions and make informed choices. Businesses face barriers that make it difficult for them to operate in the internal market; the European Regulators Group for Audio-visual Media Services (ERGA¹⁷) is said to have a limited scope of action, while insufficient regulatory convergence affects media market players and harms the public interest. The reasoning of the European Commission states that the role of regulators is crucial to protect against unreliable media service providers, including those from third countries that may harm or endanger public security and defence. European media service providers also face increasing interference in their editorial decisions and their ability to provide quality media services, as evidenced by the Commission's annual reports on the rule of law¹⁸ and the Media Pluralism Watch. Problems identified include opacity and bias in proprietary audience measurement systems that distort advertising revenue streams and non-transparent and unfair allocation of state advertising. In the final report of the Conference on the Future of Europe, published on 9 May 2022, in their recommendations, citizens called on the EU to further promote media independence and pluralism, mainly by introducing legislation to address threats to media independence through minimum standards at an EU wide level. They also asked the EU to defend and support free, pluralistic, and independent media, to step up the fight against misinformation and foreign

15. COM(2021) 350 final and SWD(2021) 351 final. <https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=COM:2021:350:FIN> - <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52021SC0351>

16. In addition, media services should be provided in accordance with the accessibility requirements of Directive (EU) 2019/882 (European Accessibility Act) (OJ L 151, 7.6.2019, p. 70). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882>.

17. European Regulators Group of Audiovisual Media Services. <https://erga-online.eu/>

18. 2020 Rule of Law Report, Communication and country chapters [COM(2020) 580 final (<https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX%3A52020DC0580>) - [COM(2021) 700 final (<https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX:52021DC0700>) - 2022 Rule of Law Report, Communication and country chapters [COM(2022) 500 final] <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1658828718680&uri=CELEX%3A52022DC0500>

interference and to ensure the protection of journalists¹⁹. The Commission aims to regulate the ecosystem to complement the e-commerce Directive²⁰ and the Regulation on platform-business-to-business (P2B) relations²¹. Be consistent with the Digital Services Act (DSA)²² and the Digital Marketplaces Act (DMA)²³, which provide horizontal frameworks that set harmonised rules for online services. The policies it promotes complement the provisions on state advertising and the targeting of advertising policy are compatible with the Protocol on the Public Broadcasting System (Amsterdam Protocol)²⁴, the Strategic Compass on Security and Defence and the relevant European Council conclusions²⁵, and are in line with the Recommendation of the Committee of Ministers of the Council of Europe on the governance of public media²⁶. The European Commission's policy adds a targeted

19. Conference on the Future of Europe - Report on the final outcome, May 2022, in particular proposal 27(1) and proposal 37(4). <https://futureu.europa.eu/en/pages/reporting?locale=en>

20. Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ("Directive on electronic commerce") (OJ L 178, 17.7.2000, p. 1). <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32000L0031>

21. Regulation (EC) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online mediation services (OJ L 186, 11.7.2019, p. 57). <https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX%3A32019R1150>

22. COM(2020) 825 final. <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=COM%3A2020%3A825%3AFIN>

23. COM (2020) 842 final. <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=COM%3A2020%3A842%3AFIN>

24. Treaty of Amsterdam amending the Treaty on European Union, the Treaties establishing the European Communities and certain related acts - Protocol annexed to the Treaty establishing the European Communities - Protocol on the system of public broadcasting in the Member States (OJ C 340, 10.11.1997, p. 109). <https://eur-lex.europa.eu/legalcontent/EN/ALL/?uri=OJ%3AC%3A1997%3A340%3ATOC>

25. Council Conclusions. Complementary efforts to strengthen resilience and counter hybrid threats, 14972/19, 10.12.2019, <https://data.consilium.europa.eu/doc/document/ST-14972-2019-INIT/en/pdf- Council Conclusions on strengthening resilience and countering hybrid threats, including misinformation in the context of pandemic COVID-19, 14064/20, 15.12.2020, https://data.consilium.europa.eu/doc/document/ST-14064-2020-INIT/en/pdf, and Council Conclusions on information manipulation and foreign interference, 11429/22, 18.7.2022, https://data.consilium.europa.eu/doc/document/ST-11429-2022-INIT/en/pdf>.

26. Recommendation Rec (2012)1 of the Committee of Ministers to Member States on the governance of public media (adopted by the Committee of Ministers on 15 February 2012, at the 1134th meeting of Deputy Ministers). <https://www.coe.int/en/web/freedom-expression/committee-of-min>

safeguard against the deployment of spyware on devices used by media service providers or journalists, based on the protection provided by Directive 2002/58/EC (Directive on privacy and electronic communications), Directive 2016/680/EU (Law Enforcement Directive) and Directive 2013/40/EU on attacks against information systems, the Recommendation on the protection, safety and empowerment of journalists²⁷, as well as the proposal for a Directive²⁸ and the Recommendation²⁹ on the protection of persons taking public participation actions against manifestly unfounded or abusive legal proceedings (“strategic actions to discourage public participation”). The Commission also implements policies based on the European Action Plan for Democracy, the European Declaration on Digital Rights, and the Digital Decade Principles³⁰. It is underlined that the European Parliament has called for strengthening funding possibilities for the news media sector, particularly through a permanent fund under the Creative Europe Programme³¹. The European Council also called on the European Commission to strengthen funding for independent journalism.

As stated in EMFA’s consultation documents, global online platforms are online advertising providers and divert financial resources, thus affecting its economic viability. Some providers of video-sharing platforms or very large online platforms may also qualify as media service providers. Interference in editorial decisions may be direct or indirect, from the State or other actors to shareholders who may act in ways beyond the necessary balance. Public media are particularly exposed to the risk of interference, while in private media, the public needs to know who owns them. Robust self-regulation effectively guarantees the quality and professionalism of media services.

isters-adopted-texts/-/asset_publisher/aDXmrol0vvsU/content/recommendation-cm-rec-2012-1-of-the-committee-of-ministers-to-memberstates-on-public-service-media-governance-adopted-by-the-committee-of-ministers-o

27. COM (2021) 6650 final. [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PL_COM:C\(2021\)6650](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PL_COM:C(2021)6650)

28. COM (2022) 177 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0177>

29. Commission Recommendation (EC) 2022/758 of 27 April 2022 on the protection of journalists and human rights defenders against manifestly unfounded or abusive legal proceedings intended to discourage public participation (“strategic actions to discourage public participation”) (OJ L 138, 17.5.2022, p. 30). <https://eur-lex.europa.eu/eli/reco/2022/758>

30. COM (2022) 28 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A28%3AFIN>

31. European Parliament, Committee on Culture and Education, Report on European media in the digital decade: an action plan to support recovery and transformation (2021/2017(INI)). [https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/2017\(INI\)andI=en](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/2017(INI)andI=en)

MILESTONES OF EUROPEAN MEDIA LEGISLATION

The first attempt to formulate an ethical standard in Europe was, through the Commission's strategy against misinformation³², with the 2018 Code of Conduct³³. The initiative concerned the digital environment and aimed at regulating the major platforms and, as such, every actor in the ecosystem, n³⁴, focusing even on infodemics³⁵, which led to the revision with the introduction of a method of continuous improvement in the phase that started in June 2021. The Code was strengthened in June 2022³⁶, including provisions for monitoring compliance, reporting of those platforms that joined the ethical framework with the results of its implementation, the creation of dedicated task force groups to review and continuously improve the requirements, and clear regulatory links (edges and nodes) to the Digital Services Act (DSA) and more recently to the MFA Regulation. This ethical framework has the signatures of content-sharing technology giants, is accompanied by integration guidelines, and includes 44 commitments and 128 measures in the areas of avoiding exploitation of misinformation, transparency in political advertising, limiting manipulation of public behaviour, dark patterns and false accounts, making tools available to users to detect false information and empowering the fact-checking community in all EU languages. In essence, this European framework could apply to all actors involved in producing and distributing information content and have a form, structure and implementation

32. European Commission. (2023). tackling online disinformation. shaping Europe's digital future. retrieved from <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation>

33. European Commission. (2022, 16 June). 2018 Code of Practice on Disinformation: shaping Europe's digital future. retrieved from <https://digital-strategy.ec.europa.eu/en/library/2018-code-practice-disinformation>

34. European Commission. (2020, 10 September). assessment of the Code of Practice on Disinformation - Achievements and areas for further improvement. shaping Europe's digital future. retrieved from <https://digital-strategy.ec.europa.eu/en/library/assessment-code-practice-disinformation-achievements-and-areasfurther-improvement>

35. European Commission. (2020, 10 September). disinformation: EU assesses the Code of Practice and publishes platform reports on coronavirus related disinformation. shaping Europe's digital future. retrieved from https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1568

36. European Commission. (2022, 16 June). Strengthened Code of Practice on Disinformation. shaping Europe's digital future. Retrieved from <https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation>.

similar to all Standards and their requirements. European legislation focuses on completing critical areas of the Digital Single Market and the Media, moving towards regulations and recommendations that work in a complementary way and establish coherent frameworks. Specifically, for Codes of Conduct and Ethical Standards combined, both the DSA, the MFA and the relevant Recommendations 1534/21 and 1634/22 emphasise the importance of ethical self-regulation for the quality of media content, the independence and protection of journalism, countering misinformation, prioritising the public interest, transparent operation of media organisations, avoiding concentration and satisfying the public with reliable technical standards. The philosophy behind every Digital Single Market initiative is encapsulated in the conceptual framework of deregulation through over-regulatory legislation in the name of public interest and self-regulation of high ethical and quality standards in the media. The interpretation behind this approach can only be given if the media are treated as organisations that play a key role both in the production of content distributed by themselves or intermediary providers, but also in that they significantly assist other industries, such as e-commerce and advertising, especially digital, where the collection of personal data from the public is required. The set of recommendations and proposed coherent European policies draws its legal basis from EU law and the basic premise that in the digital environment in general, the rights of the user, consumer, and citizen should be protected even from content distributed by intermediaries (for example the relevant reference to the DPA) and aims to create Standards of ethical responsibility, journalistic independence and transparency in media governance. In Recommendation REC 1634 (2022), the Commission mentions in paragraphs 12 and 14 the importance of self-regulatory Standards for independence and transparency in ownership, as demonstrated by the experience of media service providers that have implemented corporate standards or governance mechanisms such as editorial guidelines or codes of conduct or ethics committees to protect editorial independence.

The remarks in the explanatory memoranda of directives and regulations even mention good self-regulatory practices that may be required as licensing and subsidy safeguards for specific media service providers. Field 13 of the Recommendation states that while it is legitimate for private media owners to choose and decide on long-term editorial guidelines, it is crucial to ensure that editors can cover the news independently. Editors should be able to balance corporate rules and freedom of expression. The recommendation includes proposals, such as conscience clauses to protect against disciplinary sanctions or arbitrary dismissal of editorial staff members who refuse assignments they consider to be contrary to professional standards.

The reference to field 14 underlines that media self-regulation and standards of journalistic ethics are practical tools to empower journalists because they help them resist unjustified political or commercial pressure, thus enhancing public confidence in the media. Recital 34 states that the MFA Regulation recognises the importance of self-regulatory mechanisms in media services on very large online platforms. These self-regulatory mechanisms represent a form of voluntary initiative which allow media service providers or their representatives to adopt procedures and common guidelines, including standards of conduct, error correction, or complaint handling, among themselves and for themselves. It proposes robust, comprehensive and widely recognised media self-regulation, which would effectively guarantee the quality and professionalism of media services and ensure editorial integrity. It is noted that both the Council of Europe³⁷ and the Commission³⁸, as well as the European Parliament, have expressed a strong interest in protecting freedom of expression, media independence, tackling misinformation, hate speech, Strategic lawsuits against public participation (SLAPPs)³⁹, data protection and the protection and safety of journalists. The European Parliament, in various resolutions,⁴⁰ develops actions to support independent journalism and the protection of journalists.

THE FIGHT AGAINST MISINFORMATION

The “les fleurs du mal” in the European media, such as misinformation, misreporting, propaganda, over-concentration, plagiarism, lost copyright revenues, intimidation of investigative journalism, trade in personal data and interference with the centres of power, have attracted the attention of the relevant Community institutions, as well as the broader society.

37. Council of Europe. (2023). Freedom of Expression. <https://www.coe.int/en/web/freedom-expression/home>

38. European Commission. (2022, September 16). European Media Freedom Act: Commission proposes rules to protect media pluralism and independence in the EU. https://ec.europa.eu/commission/presscorner/detail/en/ip_22_5504 - European Commission. (2022, June 16). Strengthened Code of Practice on Disinformation. <https://digitalstrategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation>

39. Strategic lawsuits against public participation (SLAPPs) Briefing 29-09-2022 [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2022\)733668](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2022)733668)

40. European Parliament. (2022, May 19). Press freedom: the European Parliament stands by journalists. <https://www.europarl.europa.eu/news/el/headlines/society/20220513STO29508/eleutheria-tou-tupou-to-europaiko-koinovouliosto-pleuro-ton-dimosiografon>

During the times of multicrisis, such as the economic crisis, the misinformation about pandemic COVID 19 and the Russian invasion of Ukraine, threats and attacks on journalists were on the increase and the market was being distorted by the sweeping dominance of the American and Chinese technology giants. Almost all these challenges are referred to in many Community documents, resolutions, decisions, directives, and recommendations, with misinformation dominating as the most important of all. The European Commission published a Code of Conduct⁴¹ on misinformation in 2018, inviting digital platforms, tech companies in general, and the advertising industry to adhere to it as part of a self-regulatory approach.

The 2019 self-assessment reports of the entities that joined the Code show extensive efforts by the signatories to implement their commitments. However, the pandemic revealed the inadequacy of the framework⁴² and the need to strengthen it⁴³. This framework focuses on the issues of avoiding placing advertising next to misinformative content or a medium that misinforms so that there is no financial benefit associated with the circulation of false information, strengthening transparency in political advertising so that it is discrete, avoiding manipulation and dark patterns, making tools available to identify misinformation by users, making data available for research purposes, strengthening the control of data and information, setting up a working group to review compliance with the Code and its revision, to adopt indicators for monitoring the services and periodic reports.

The EU has allocated huge funds to develop systems to assist the editorial room in confirming and verifying information. Overall, such systems require highly skilled journalistic moderation, which means that additional resources are required from the media, especially allocating significant time to content production, expenditure on technological applications and user training costs. In any case, even investing in such a strategy is not considered the only sufficient and necessary condition to deal with "fake news". At the same time, the development of natural language processing applications with huge databases from media all over the world has brought to the "application market" the service of automatic detection of misinformation. However,

41. European Commission. (2022, June 16). 2018 Code of Practice on Disinformation. <https://digitalstrategy.ec.europa.eu/en/library/2018-code-practice-disinformation>

42. European Commission. (2020, September 10). disinformation: EU assesses the Code of Practice and publishes platform reports on coronavirus related Disinformation. https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1568

43. European Commission. (2022). The 2022 Code of Practice on Disinformation. <https://digitalstrategy.ec.europa.eu/en/policies/code-practice-disinformation>

as reported in THE AI INDEX REPORT-Measuring trends in Artificial Intelligence at Stanford (Maslej et al., 2023),⁴⁴ fairness, bias and ethics in machine learning remain issues of interest to researchers and practitioners. Still, research has found severe problems with the accuracy of machine results.

In the study, also cited by Stanford, Missing Counter-Evidence Renders NLP Fact-Checking Unrealistic for Misinformation by Glockner et al. (2022),⁴⁵ it is found that by design, existing NLP fact-checking task definitions cannot counter misinformation as professional fact-checkers do for the majority of claims. In particular, researchers comparing fact-checking results between expert websites and automated applications find that 11 of 16 such datasets are based on “leaked” data from fact-checking reports that did not exist when the claim was made. Under these circumstances, it is confirmed that it is probably more appropriate to synchronise NLPs processing with the human verification process and improve verification procedures and strategies. It remains important to note that the fact-checker, with their subjective approach, also influences the outcome of the process. This shows the value of continuous training of media executives involved in verification and fact-checking.

The Digital Services Regulation - DSA

In the Digital Services and Intermediary Services (DSA) Regulation, which mainly concerns very large digital platforms and comes into force in 2024, there are no explicit references to any legal facility or priority required to be provided by an intermediary service provider to users belonging to or making media organisations. Nevertheless, there are some obligations within the Regulation, compliance with which provides journalists and journalistic organisations with additional legal tools to protect their work and the freedom of expression of the media in general. Key provisions/obligations in the abovementioned context:

- Article 14 provides that the restrictions on the use of the service contained in the “Terms and conditions of use” of the intermediary service should be applied in a way that respects, inter alia, the right to freedom of expression, as well as the freedom and pluralism of the media. Given that this provision also applies to the

44. Maslej, N., Fattorini, L., Brynjolfsson, E., Etchemendy, J., Ligett, K., Lyons, T., and Perrault, R. (2023). The AI Index 2023 Annual Report. *AI Index Steering Committee, Institute for Human-Centered AI, Stanford University, Stanford, CA.* <https://aiindex.stanford.edu/report/>

45. Glockner, M., Hou, Y., and Gurevych, I. (2022). Missing Counter-Evidence Renders NLP FactChecking Unrealistic for Misinformation. *ArXiv* (Cornell University). <https://doi.org/10.48550/arxiv.2210.13865>

sections of the terms of use concerning content moderation, it follows that any action taken by platforms on journalistic content - e.g., ban, strike down - and carried out without due consideration and without weighing up the possible violation of the above-mentioned fundamental rights, is potentially unlawful.

- It also introduces several obligations aimed at providing transparency and dispute resolution tools to users regarding any illegal or unfair restrictions placed on specific users' content by hosting providers and platforms. In particular, when a hosting provider imposes one of the content restrictions on a user, it must provide a detailed and transparent justification for its decision to the affected user. At the same time, platforms must provide affected users with easy access to an internal complaint management system through which any complaints by affected users can be resolved. Finally, the platforms should also give the affected user the option to have recourse to an out-of-court dispute resolution body certified by the Digital Services Coordinator - New Supervisory Authority to avoid lengthy judicial procedures. The above three obligations can be used by media outlets to achieve faster and more effective protection in cases where the content they upload on their platforms is illegally censored (DSA, Articles 17-21).
- Article 34 (DSA) introduces an obligation for very large online platforms to carry out annual Risk Assessments, which should take into account all aspects of the platform's operation, such as the design of their systems and algorithms, the content moderation systems they use, their terms of use, their advertising systems, and their ID processing practices. The systemic risks that should be considered are:
 - a. the dissemination of illegal content through the service;
 - b. the restrictions on fundamental rights by the way it operates - including freedom of expression and media pluralism,
 - c. any negative impact on political dialogue, electoral processes and public security; and
 - d. negative impacts in relation to gender-based violence, public health protection and minors.

From the introductory considerations of the Regulation, it is clear that to assess these risks, the role of the dissemination of disinformation through the platform should be taken into account, while platforms should consult with representatives of social and professional groups potentially affected by the proper functioning - or not - of the platform (including representatives of the media industry).

In the near future, it is not impossible that an online news or media service may also constitute a platform within the meaning of the DSA and will have to

comply with the relevant provisions. This can be the case if the operating model of the medium is based on the provision of content by its users/readers of the service to the public (and not in cases where the medium is the employer of the journalists who create the content). How close the media are to being affected by the Regulation is related to the increasing use of UGC⁴⁶, drawing information from intermediary providers such as social media and interacting with users within their websites.

Copyright Protection and Directive 2019/790

News content plagiarism, paraphrasing through rewriting for alteration or the illegitimate practice of churnalism,⁴⁷ according to Nick Davies (2008)⁴⁸, which introduced into the news with journalistic signature public relations content by dominant mechanisms, is a current problem for many journalists and the media industry. To counter that would mean to identify and manage incidents - with the "analogue" approach in a newsroom - if journalists are able, have the required verification time and have the appropriate technical means.

However, the time available to process, verify the truth, document and filter to avoid infringement of intellectual property rights does not exist in the rapid age of digital publishing. At the same time, more skills are required from editors, and media availability also shows characteristics of planned obsolescence, as day-by-day innovation is devaluing even the suitable technology until yesterday. In this environment, the main technological platforms have taken it upon themselves to republish the news content of the media for commercial exploitation through advertising, especially that which requires, on the one hand, unfair access to intellectual property and, on the other hand, the collection of personal data of users on news websites. The relationship between publishers and platforms (and social media) is characterised as a frenemies relationship due to the, albeit insignificant, revenue return to the media. It is precisely this problematic situation that the

46. Barbosa, M. (2021). The "so-called UGC: an updated definition of user-generated content in the age of social media. *Online Information Review*. https://www.researchgate.net/publication/352004122_The_socalled_UGC_an_updated_definition_of_user-generated_content_in_the_age_of_social_media

47. Uncritical use or overuse of press releases by journalists. Churnalism is a word that came to prominence in 2008 with the publication of *Flat Earth News* by Nick Davies.

48. Davies, N. (2008) *Flat earth news: An award-winning reporter exposes falsehood, Distortion and Propaganda in the Global Media*, London, Chatto and Windus.

European Commission has attempted to correct with two legislative interventions. The GDPR Regulation, which requires the legality of processing, and Directive 2019/790⁴⁹, stipulate that digital content publishers, producers of digital content, and journalists are entitled to the same benefits as those granted to them in the analogue environment.

As provided for in Directive 790, journalists must indirectly collect from digital platforms for the use of their work as part of the payment for intellectual property rights paid by the major technology platforms for the distribution of content and sale of advertising to their publisher.

After the emergence of Open AI's GPT-type natural language generation algorithms and the resulting applications, the intellectual property of the journalistic work starts to apply from its integration into the training data of an NLP. It continues in the chat response at the second level from the prompt (introductory user text motivated by the machine to respond). It expands with the content of this response, which may be based on a protected intellectual work of digital media and accompanied by the user's personal data. As a consequence, an important issue arises concerning the intellectual property of the work of AI machines. Although it is not legally established, and it is logically sound to take a positive approach to the characterisation of AI as a creator, there is no shortage of views put forward in the European debate on the regulation of AI to take an approach to this possibility as well, so as not to hinder innovation. In other words, the written word or a visual creation could be examined as to how and to what extent it could be considered an intellectual creation.

It is recalled that the characteristics for managing digital content are its format, size, frequency of renewal and adaptation, criticality, importance, classified access to it, distribution needs, ways of reading it, and compatibility with other forms of content. In European legal thought, plagiarism, even as a reassembly and synthesis of many sources within the corpus of a natural language production tool, does not constitute creation, let alone art. Besides, the deep structural similarities and similarities of phrases with articles previously published elsewhere have led Media,⁵⁰

49. European Parliament and Council of the European Union. (2019, May 17) Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market and amending Directives 96/9/EC and 2001/29/EC. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0790>

50. <https://www.engadget.com/cnet-corrected-41-of-its-77-ai-written-articles201519489.html?guccounter=1>

but especially schools⁵¹ and universities, to view the use of such technologies negatively. However, the technical way of precisely detecting this plagiarism with existing tools has not been effectively resolved. Another particular case is the leakage of users' search discussions to other users. Although this phenomenon seems related to personal data, it also involves intellectual work or even, as it happened with Samsung employees, these corporate secrets are collected by an AI tool such as the Generative Pre-trained Transformer 4 (GPT-4) technology. All these findings, along with the thought of the potential use of AGI by journalists, raise legitimate concerns about the security of information processed in confidence by a newsroom, the consideration of the reliability of sources and their protection from erroneous disclosure of confidential or generally unpublished information by the media. Against all of the above, the chosen legal form of European intellectual property protection policy as a Directive should probably not be expected to bring technology companies into line or even to have much influence on their approach to the more ethical management of the intellectual work of media companies and journalists. To confirm this, European legislators, in their consultation on the draft Regulation for the regulation of AI applications, propose to hold every developer of tools such as ChatGPT accountable by disclosing where they derive their content and intellectual property from. This approach enriches the debate about the rights of publishers and journalists from using intellectual work published by the media.

Copyright, users and journalists

Media organisations respect the intellectual property rights of others and expect third parties to do the same. In appropriate circumstances and at its discretion, the Media's policy is to disable and/or suspend services to subscribers who repeatedly infringe or are repeatedly accused of infringing its copyright or other intellectual property rights and/or those of third parties. Readers-users-viewers are encouraged to engage in safe and lawful file sharing of copyrighted material. The user is granted permission to use the content of the Medium in a specific manner and for lawful use thereof, understanding the value inherent in that context, the work of the journalists, and the investment made in its production. Content being used without authorisation undermines the medium's ability to support its news.

Protecting journalists' work from misuse and abuse is of paramount importance.

51. <https://www.nbcnews.com/tech/tech-news/new-york-city-public-schools-ban-chatgpt-devicesnetworks-rcna64446>

The medium is required by law to inform its users of the legal risks associated with digital copyright infringement. Legally protected material may include news reports, photo reports, speeches, documentaries, television programs and published material. Using the Instrument's websites and peer-to-peer (P2P) file-sharing software programs may lead to illegal downloading or downloading of copyrighted works (curators and creators), even without the user's knowledge. Directive 2019/790 (Digital Single Market Directive) on copyright and related rights in the Digital Single Market modernises the rules on copyright. The importance of digital copyright lies in the fact that, at a legal level, they allow the rightsholder to control their work at all stages of its journey on the Internet. The medium tries to apply, wherever technologically feasible (with author and editor signatures and with content management systems that do not allow publication without a signature), all new technological means of protection to prevent infringement or limit illegal acts. The Media hosting or referring to third-party content is the provider's responsibility. The Terms of Use must make full reference to any rights and obligations. Implementing the Directive requires an agreement between the technology giants and NLP platforms and publishers based on a specific method of valuing the goodwill for the former from the redistribution of informative content and an agreed percentage of the copyright (related right). Similarly, the agreement between publishers and creators should be based on a standardised valuation procedure on an agreed percentage of the royalty received by the platforms.

Safety and Protection of Journalists (SLAPPs)

One dimension of European initiatives that give greater advantages to the self-regulation of the media industry is how the legislative body of the European Parliament, the Council of Europe, and the European Commission are addressing contemporary challenges that threaten freedom of expression. In other words, self-regulation of the Media Industry gives organisations the possibility of greater institutional power, achieving a serious moral advantage over state authorities when their initiatives concern the protection of fundamental rights such as freedom of expression through the safe exercise of investigative journalism.

In its recommendation⁵² on the protection of journalism and the safety of journalists and other media professionals, the Council of Europe in its 2020 Protection

52. CM/Rec(2016)4. https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016806415d9#_ftn1

Guidelines,⁵³ emphatically raises the issue of intimidation, threats, lawsuits, and impunity for those responsible for violence against media professionals engaged in investigative journalism. Within the basic guidelines, in addition to the responsibility of the organised State and the regulatory authorities, the media organisations' responsibilities, such as risk identification, individual protection measures, legal cover, and specific staff training, are also highlighted. The European Parliament, in its resolution of 25 November 2020⁵⁴, on "Media freedom, media pluralism and protection of journalists in Europe", expresses its deep concern about the violence and threats against journalists and other media professionals, hate speech on the Internet, misinformation and its acceleration on platforms and, in any case, the lack of digital literacy among users. In the context of the safety and protection of investigative journalism and recognition of the importance of press freedom for democracy, the European Commission issued Recommendation Breton 1534/2021⁵⁵, which states that media self-regulatory bodies have a central role to play in raising awareness, digital education of journalists and other actors and in cooperating with relevant bodies such as the judiciary, prosecuting authorities and regulators.

In addition, the media and journalists' associations have the incentive to self-regulate properly for their independent and ethical functioning when supranational authorities recognise that they can assist in several legislative changes and practices as proposed by EU institutions, such as the establishment by states of frameworks for cooperation between law enforcement authorities and journalists, strengthening cooperation with Europol and Eurojust, establish independent contact and assistance points for journalists and other media workers, develop a training program for law enforcement authorities and the judiciary, assist in upgrading the skills of media workers, speed up the handling of cases of attacks and threats, take measures to avoid online surveillance of journalists and take initiatives to inform and raise awareness in society.

53. Council of Europe. (2020, June). *Implementation Guide to Recommendation CM/Rec (2016)4 on the Protection of journalism and safety of journalists and other media actors*. <https://rm.coe.int/safety-implementation-guide-en-16-june-2020/16809ebc7c>

54. 2020/2009(INI). European Parliament. (2020, November 25). *European Parliament resolution of 25 November 2020 on strengthening media freedom: the protection of journalists in Europe, hate speech, disinformation and the role of platforms*: https://www.europarl.europa.eu/doceo/document/TA-9-2020-0320_EN.html

55. European Commission. (2021, September 16). *Commission Recommendation (EU) 2021/1534 of 16 September 2021 on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union*: <https://eur-lex.europa.eu/eli/reco/2021/1534/oj>

General Data Protection Regulation (GDPR)

Exempting⁵⁶ journalistic processing from the GDPR requires Codes of Conduct for processing personal data, awareness of Regulation 679/2016, and appropriate record-keeping for particularly controversial decisions. The purpose of the exemption is to safeguard the right to freedom of expression as set out in Article 10 of the ECHR⁵⁷. It covers the “specific purposes” of journalism, and the exception’s scope is very broad. It gives the media considerable leeway to decide what information may be relevant to the public interest. In this light, the Media Agency can justify journalists’ actions in the public interest. Even if the publication is clearly in the public interest, this still does not mean PR is completely ignored. The exception is broken down into four elements⁵⁸:

- (1) the data are processed only for journalistic purposes,
- (2) to publish some material,
- (3) in the reasonable belief that publication is in the public interest; and
- (4) with a reasonable belief that compliance with the strict spirit of the GDPR is incompatible with journalism.

The focus should be mainly on elements 3 and 4. There should be a plausible argument that the public interest justifies the infringement. Suppose the method of investigation or the details to be published are particularly disturbing or damaging to an individual. In that case, a more substantial and specific public interest argument will be required to justify this, over and above the general public interest in freedom of expression.

An essential dimension of the business operation of media organisations is advertising as a key source of revenue. This vital activity in the digital ecosystem is directly related to user audience engagement, i.e. the collection of users’ personal data and targeted advertising based on their interests and preferences. This advertising business model is challenged in terms of its legitimacy by the GDPR. In particular, the legal basis for the processing of personal data, the transfer of this personal data to third parties for the automated display of personalised advertising messages to people with allegedly relevant personal interests and the possibility

56. Art. 85 GDPR. <https://gdpr-info.eu/art-85-gdpr/>

57. No. 10 ECHR. <https://fra.europa.eu/en/eu-charter/article/10-freedom-thought-conscience-and-religion>

58. Privacy and freedom of expression policy <https://www.amna.gr/article/569708/Politiki-stathmisis-idiotikotitas-kai-eleutherias-tis-ekfrasis-rn>

for even platforms that do not comply with Regulation 679/2016 to keep this data outside the European Economic Area to fully exploit the opportunities. In this sense, the media have a great responsibility because they are the main method of harvesting users' personal data, even by actors with unfair purposes.

CONCLUSIONS

The European Union's agenda includes an unprecedented package of institutional interventions to regulate the digital single market with a significant impact on the global technology ecosystem, including communication, freedom of expression, and protection against malicious content such as disinformation and propaganda. The prevailing legal perspective focuses on legality, transparency, and human rights such as freedom of expression, privacy, and intellectual property protection. The philosophy behind these interventions is that what is illegal in the analogue and the physical world is also illegal in the digital environment.

In this context, there are Regulations, Directives, as well as Recommendations from the European Commission and the Council of Europe related to the protection of European persons' personal information and the free movement of personal data, the conditions of fair business activity of technological giants in the services sector, the governance of the media, the fight against misinformation as a digital threat to the European construction and the safeguarding of intellectual property rights from the unfair exploitation of the media.

Based on the experience gained from the adoption of the General Data Protection Regulation on the one hand and the rapid technological development and the advent of Artificial Intelligence in the field of communication and information on the other hand, the European institutions are intensifying their strategy of regulatory intervention in all fields, in the absence of rules in the global digital market. In three areas where Europe has set primary conditions, there is a divergence from the intended objective, and therefore, the possibility of refining revisions should not be ruled out. These are misinformation, freedom of the press and copyright.

In the case of misinformation, the Code of Conduct and the competent oversight bodies have not delivered the expected results, either because of unfair or malicious practices through technological developments or because the liquidity of the financial, economic, social, and geopolitical environment has multiplied the demands for defence against the transformation of false information into weapons in the hands of people, propaganda mechanisms or even states, as mentioned in European reports on Russia's activities during the war in Ukraine.

In the subject of freedom of expression, the independence of the press, the avoidance of concentration, the confrontation of political and economic interests, and responsible journalism protected from threats. However, they were issues that had been of concern for years to the institutions, such as the European Parliament, the Commission, and the Council of Europe; it was belatedly realised that because they are cornerstones of European construction, Directives and Recommendations are insufficient as interventions. Still, the adoption of a mandatory regulation is required.

Another problematic case where the inadequacy of the chosen intervention in the form of a Directive is apparent is the regulation of intellectual property concerning global platforms. In this case, there is a delay in national legislative initiatives to transpose the Directive and a centralised negotiation with the content distribution platforms for commercial exploitation so that digital publishers and journalists can collect the corresponding intellectual property rights, which have not yet matured. Added to this situation is the invasion of artificial intelligence and natural language generation applications, which, using primarily digital media content, have flooded the internet with algorithmic content, which is the product of synthesis and inference and from sources that spread malicious content full of prejudice and lies.

All this allows us to conclude the great responsibility of the media and journalism is to defend, first and foremost, institutions, human values, society, and citizens. Media Governance with provisions that would encourage ethical self-regulation would ensure the vital need for the survival of independent businesses, and responsible journalism that adheres to the basic ethical principles of the profession can fully carry out its mission in the name of the public interest. The following part examines both applied ethics in journalism and responsible governance of independent organisations as fundamental concepts for ethical self-regulation in the media industry.

Part Two

**ETHICAL GOVERNANCE
BY DESIGN**

ETHICAL GOVERNANCE - RISKS AND CHALLENGES

Ethics is a tool for media organisations and journalism. Without ethical standards, developing a self-regulatory initiative and describing a virtuous public mission of a medium is impossible. Dealing with risks, threats to the independence of the media and the newsroom or avoiding conflicts of interest are when ethical commitments regulate the press industry. The culture of compliance with codes of ethics strengthens the defence against attempts to manipulate media and journalists. As soft law, it shapes conditions of strong self-commitment against pressures from regulators, avoiding moral defeat in the tug of interest. For the public to make decisions based on accurate information, it must rely on the adherence of media and journalists to ethical rules of truth. The challenges of the times, especially technological developments, exacerbate the need to protect the public interest from the self-interest of speculative business interests or the view that the media are political tools serving economic goals.

In the era of digital transition and the search for new business models, either for technological modernisation or compliance with new regulatory rules, media organisations are looking for ways to enhance their competitiveness by reining in costs but fundamentally to address unfair competition by replacing unruly reality with standard business rules. Extending the life of an organisation and maintaining an ethical advantage, such as that given by self-regulation, directs businesses to seek those Standards and certifications that offer the most appropriate performance indicators at a higher level of merit, trust, public trust, and recognition of their contribution to society. The most important of these Standards is the ethical one, namely the Code of Journalistic Ethics, as supplemented by the Editorial Guidelines of the Organisations. Today, information is provided to citizens worldwide through digital media, either directly by publishing organisations, aggregation and sharing platforms, or digital social networks. Experience has shown in several undeniable incidents, such as the use of digital tools to influence elections, that in online media, the moral hazard for citizens is magnified when they are confronted with a storm of fragmented discourses and information without relevance and validity checks, identical content due to over-concentration and/or propaganda practices, misinformation or dark patterns that aim to distort and manipulate free judgment. The risk concerns the vital interests of society and can only be mitigated if the media operate according to an ethical compass in the public interest. These rules may be both self-regulatory for a medium or a group of similar media within commonly

accepted self-regulatory frameworks and regulatory in nature when editorial initiatives align with the regulatory provisions of national and supranational regulatory authorities.

Definitions:

- **Ethics:** Refers to primary assumptions held by individuals, organisations, or professions that are used to help members of communities make sound decisions about what is right and wrong.
- **Deontological Ethics:** Deontological Ethics is a set of rules based on principles and values and can be defined as a means or principled approach to ethical decision-making.
- **Code of Conduct:** It codifies the rules and good practices that bind everyone in a professional space or community.
- **Guideline:** Soft law which includes rules of operation, procedures, and conduct and may consist of commonly accepted Codes of Conduct

According to Ndhlovu (2020), the term ethics refers to behaviour guided by rules for human actions and behaviour with a categorisation of good (right) and evil (wrong). Ethics is a branch of philosophy, and according to the Oxford Dictionary, it is the moral principles that direct or influence behaviour. The English language terms “ethics” and “moral” are derived from Greek and Latin two words which are synonymous, yet are used differently as concepts. In simple terms, Ethics is used when referring to Codes of Conduct at the level of larger societal groups. When referring to the ethics of an individual or group, the word moral is used. In applied ethics, the impact of a news story is examined. The focus is not only on the identity and action of the journalist but also on the reactions/impact of the publication of this news information.

According to Allen (2019), ethics is the laboratory experiment verifying right and wrong, just and unjust. Often, journalists’ personal ethics and professional ethical standards may need to be weighed as superior values even to criminal law because ethics may converge with law, but the terms are distinct. An extensive set of norms involving social mechanisms, such as laws and ethical standards, can be divided into laws providing punishment and ethical violations leading to shame and disgrace. At the same time, the moral mechanism with its set of ethical norms can become an evaluative mechanism for the legitimacy of the law, as ethics can become a criterion for the legality of the law. This assumption is used as a defence by the media to investigate and publish Even when they collide with legislative prohibitions. Durkheim (1992 [1957]) argued that this rationale for the journalist’s focus on the social norm and the public interest explains the reasons why no

professional activity can be carried out without its moral standards.

Ethical self-regulatory rules, such as Codes of Conduct in the media, focus predominantly on certain accepted principles, as highlighted in a report by Puddephatt (2011: 11) for the United Nations, based on a reference on Kovach and Rosenstiel⁵⁹ on respect for truth and the public's right to the truth, the right to fair comment and criticism, factual and objective reporting, the use of appropriate methods to obtain information, and a willingness to correct errors with respect for the confidentiality of sources.

Introducing the book "The Elements of Journalism" by Bill Kovach and Tom Rosenstiel, The American Press Institute, which helps publishers understand and engage audiences, increase revenue, and improve journalism,⁶⁰ thoroughly discusses the decalogue of principles on which journalism is based.

Widely accepted Journalistic principles
1. The first obligation of journalism is the truth
2. Its primary loyalty is to the citizens
3. Its essence is the discipline of verification
4. Those who exercise it must maintain their independence
5. It must act as an independent check on power
6. It should provide a forum for public criticism and compromise
7. It should seek to make the news essential and relevant
8. It must keep the news comprehensive and proportionate
9. Allow journalists to work with their conscience
10. Citizen journalism has rights and responsibilities

Table 1. *Journalistic Principles (American Press Institute, 2022)*

According to Kent (2013), in order to best understand journalism's function, the establishment of a legal definition and its safeguarding would be necessary. Some of the factors to be considered could arise from questions, such as is the content

59. Kovach, B., and Rosenstiel, T. (2021). *The elements of journalism revised and updated 4th edition: what newspeople should know and the public should expect*. Crown

60. American Press Institute. (2022, August 24). The elements of journalism - American Press Institute. <https://www.americanpressinstitute.org/journalism-essentials/what-is-journalism/elements-journalism/>

produced intended for the public, is it the result of creative work, and is it fact-based? Does it convey multiple opinions, are journalists protected from conflicts of interest? Does the journalist disclose their identity and publicly correct errors? In the past decade, however, the definition of journalism has been broadened to include any person who writes for the public with the intention of providing information and analysis. It is widely accepted that PR and commercially driven speech, i.e. speech of non-generalisable interests, cannot be considered journalistic. The reasons for the expansion, instead of its legal construction and limitation, lie in the fact that technological possibilities to produce journalistic content are more widely disseminated than before, but also crucially because the ringfencing of a definition can be and has been abused by states and governments, but also private organisations, with the aim of controlling and undermining information and journalists.

Looking at ethics and deontological ethics from the perspective of the publishing business, there is no social and political life as we know it today without the media. As Carlyle (1993) states, they are recognised as the ‘fourth estate’ alongside the constitutionally enshrined powers of the legislature, judiciary, and executive. Their role is not limited solely to reproducing events but also conveying political, social, moral, cultural, and other ideas. As such, they make an essential contribution to shaping public opinion. But only those media are free and independent of governmental or other control. Otherwise, according to Handzhiyska and Mackay (2017), they magnify social divisions, abandon their core functions and use their influence, reinforce state or economic powers, and exclude critical ‘voices’ from the public discourse. From journalists’ point of view, the Codes of Professional Conduct, according to the Council of Europe (COE, 2015), are the guarantor of journalism practiced under the umbrella of ethical values. It is a statement of commitment by journalists to be responsible and trustworthy. And they protect media owners and journalists against unjust criticism and legal action. They are drawn up by journalists’ associations, media organisations (public and private), and other regulatory bodies, while the state plays no role in this process. One hundred years ago, the first Codes were drawn up in Europe specifically to prevent governments’ attempts to legislate against the editorial excesses of a so-called “Yellow Press,” as stated in the Council of Europe’s Commissioner for Human Rights report⁶¹.

61. CommDH/IssuePaper(2011)1. <https://www.coe.int/t/dg4/cultureheritage/mars/source/re-sources/references/04%20-%20CM%20ComDH%20Ethical%20Journalism%20and%20Human%20Rights%202011.pdf>

The two approaches, on behalf of both the individual journalist and the corporate management, independence and impartiality based on recognised ethical rules on both sides, make a qualitative difference. Impartial journalism is solid and resilient despite attacks against journalists and despite significant undermining of journalists, especially by politics. The value of journalism is brought out also through the fair presentation of different views and all aspects of a story. It becomes a powerful ally of all those who fight for democracy and the protection of human rights. In the mid-19th century, leading European editors formulated codes of ethics for their newspapers. One hundred years later, the same year the European Convention on Human Rights was adopted, the International Federation of Journalists agreed on the first international code of principles for ethical journalism. Regulations, also known as the Bordeaux Declaration, were adopted in 1954 by the World Congress of the International Federation and amended in 1986. They have formed the foundation of the Federation's uncompromising stance (IFJ, Declaration of Principles)⁶² in defence of quality and ethical journalism. Journalism and human rights intersect under the weight of remarkable and historical changes. In 1997 the Committee of Concerned Journalists, under the administrative auspices of the Project for Excellence in Journalism, issued a Statement of Shared Purpose (Leighton, 2009), which sets out the central purpose of journalism as providing citizens with accurate and reliable information. The set of principles is summarised in three key ethical obligations of the press:

- To speak with the language of truth and accuracy.
- To maintain its independence and its loyalty to the community.
- Avoid sensationalism and trivia by protecting privacy at the expense of disseminating newsworthy information.

Based on the idea of the "Fourth Estate," the liberal theory of the press was developed in the 19th century, arguing that a free and independent press was necessary to protect public freedoms and promote liberal reform. The liberal idea of a "social contract" press was used to argue that society allows professional journalists to freely practice their craft in exchange for responsible coverage of important social issues. The liberal "social contract" highlighted two professional codes of conduct principles: preventive and restrictive. Preventive principles argue that journalists are free to publish and must publish the most accurate and comprehensive truth on matters of public interest. "Seek the truth and report it" and "act independently"

62. Global Charter of Ethics for Journalists. (n.d.-c). <https://www.ifj.org/who/rules-and-policy/global-charter-of-ethics-for-journalists.html> 7

are primary prudential principles of most Western codes of ethics. Similarly, the restrictive regulations call on journalists to use this freedom to publish responsibly. Restrictive laws include a duty to “minimise harm” to vulnerable story subjects, such as children or injured people, and to be held accountable to the public for editorial decisions. In any situation, journalists are expected to weigh the principles, standards, facts, expected consequences, rights, and impact on personal reputation. When rules are in conflict, the priority is to minimise harm if a sensitive event is reported - journalists must decide by weighing which principles take precedence. According to Ward (n.d.), logic in journalistic ethics challenges journalists to achieve a “reflexive balance” between intuitions and principles. As Ireton and Posetti (2018) state, making use of a quote from Columbia University Tower Center for Digital Journalism professor Emily Bell (2023), knowing when you have a strong enough public interest defence to break the law and being prepared to go to jail to defend your story and sources.”

The most emblematic intervention in the ethical governance of the media and the value of adherence to journalistic principles over time was that of Scott (5 May 1921), who stated in his editorial note entitled “One Hundred Years” that...

“A newspaper has two sides to it. It is a business, like any other, and has to pay in the material sense in order to live. But it is much more than a business; it is an institution; it reflects, and it influences the life of a whole community; it may affect even wider destinies. It is, in its way, an instrument of government. It plays on the minds and consciences of men. It may educate, stimulate, assist, or it may do the opposite. It has, therefore, a moral as well as a material existence, and its character and influence are, in the main, determined by the balance of these two forces. It may make a profit or power its first object, or it may conceive itself as fulfilling a higher and more exacting function”.

A hundred years after Scott, the spectacular developments in digital media have redefined how journalists work, and traditional media are organised. Contemporary news conditions test the journalist’s judgment and honesty not in a radically different way than in the past but more systematically and with incredible speed than ever before. Karcher (2009) argues that ethical journalistic norms are defined as a system of moral principles and values interpreted in the light of journalistic culture. The necessity of applying these norms is summed up in the words of Blake Morant (2005: 603) “Democracy that fosters mutual respect for the autonomous rights of others tacitly encourages citizens, including members of the press, to exercise their rights responsibly.” Compromising on the surrounding ‘environment’ and not adhering to ethical standards, according to Karcher (2009), cannot be an acceptable ‘condition’ in the media industry.

Based on the above, the question arises as to whether today's Codes of Ethics have adapted to the new environment of the internet and the intensive use of information and communication technologies in newsrooms, as it is inevitable, as Deuze and Yeshua (2001: 276) conclude, that these technological developments are shaping and redefining several ethical and moral issues that journalists face when they operate on the internet or use sources from it. As Diaz-Campo and Segado-Boj (2015) mention, 31 codes have been drafted or revised since 2001, but only 9 of the 99 codes analysed have added specific references to the Internet and ICTs.

The codes of conduct analysed reflect an attitude towards the internet and digital journalism that can be described, in short, as a widespread lack of interest and lack of coherence. In most of these nine codes studied, which include references to ICTs, there is nothing more than a statement that online journalism is subject to the same principles as traditional journalism. There are no uniform trends in how aspects specific to digital journalism are incorporated into the codes of conduct. Journalists' codes set out, for the public, the basic rules of the profession, which will find it difficult to maintain credibility if these basic rules are outdated.

Self-regulation with moral standards

Ethical Governance

Lameiras (2017) argues that the theoretical structure of media governance emphasises a set of features that can be summarised in recognition of the multiplication of decision-making centres, the recognition of multiple possible relationships between different stakeholder groups, the perspective of shared power (instead of hegemonic power, usually from the state) and the perspective of shared roles and responsibilities. This approach allows us to distinguish the four levels at which regulation can be achieved based on the following guiding principles: commitment, mutual agreement, responsibility and accountability, and voluntary adherence to standard practices.

Exploring the role of media governance as a multi-level and messy process of interaction and power struggle, Sarikakis and Winter (2021) point out that ethics as a factor in governance means appreciating the ways in which symbolic and intangible factors, such as principles, values, and ideologies, shape journalism along with structural and institutional dimensions. As they point out, media governance is best understood as a political process whose set of institutions and actions, as well as ideological background, have a regulatory effect on communication and communicative spaces. This differs from Puppis' (2010) approach to regulatory

structure or Freedman's (2008) as a set of mechanisms for organising the media. According to Lameiras (2017), the definition of media governance "includes the set of forms of collective rules in the media sector." As he states, its usefulness is that it allows a broader reflection to include the influence of regional and global actors without dismissing the importance of national borders. It has the potential to instil or lead to more responsibility since powers unilaterally impose behaviours when limits or sanctions are contrary to the idea of governance; it allows the involvement of private actors as well as citizens in the design and implementation of public policies and will enable them to intervene in decision-making; and it invites consultation, exchange, and cooperation.

Since governance, according to Sarikakis and Winter (2021), presupposes ethics to achieve self-regulation, it is arguably correct to consider journalism regulation as a model of self- and coregulation, where principles are best kept at a distance from the daily routine of the newsroom and, most importantly, where ethics is linked to the industry's self-regulatory standards as defined by Press Councils. According to Puppis (2010: p. 142), collective media governance includes the legislative, coregulation, and self-regulation that apply to all media organisations in a given industry (e.g., the press or broadcast media) and the regulatory frameworks for self-organisation. However, Sarikakis and Winter (2021) argue that, besides the obvious structures and places of decision-making, be it actors, regulations or institutions, a deeper and more encompassing factor is permanently at play, namely that of culture as a way of ideas, action and speech. Hence, journalistic ethics in the light of governance sheds light on the responsibility that falls on the media industry and states, concluding that a broader understanding of journalism is needed. The authors emphasise that a critical aspect is the analysis of ethics as governance, where the authors identify the possibility of non-traditional practices and ethics stemming from loyalty to the public taking precedence over a sense of commitment to 'golden ethical rules.'

Weak ethical governance and unsuitable or absent regulation has historically allowed governments to control the media to strengthen the power of a regime. According to Chakravartty and Sarikakis (2006), this is achieved when they link communications policy to economic interests, from enforcing intellectual property rights to ensuring that private companies have access to the latest telecommunications infrastructure, to promoting information and communications technology (ICT)-based exports, to subsidising foreign investment in communications-related industries as a development strategy. Under this condition, there is a concentration of media in a few hands, which has always been an important issue, as Papathanasopoulos (1997, p. 221) states.

Conflict of interest and misinformation

In ethical media governance, no form of risk-taking from conflict of interest or poor control for misinformation can be accepted. Much more, it cannot be ignored that technology has brought new data and highlighted new digital ethical challenges that must characterise any attempt at self-regulation for media governance.

Focusing on the malicious and false content and conspiracy theories, any reasonable observer cannot see, behind the unflattering term fake news, the greatest paradox of the scrolling news era. Currently, it is common to convey a false claim by a third party or to document a grey product advertisement as news due to novelty or opportunity to the consumer audience. Journalists, however, must check sources, have a duty not to adopt information uncritically from propaganda mechanisms, avoid advertising products or opinions, and avoid conflicts of interest. In the case of moonlighting journalism, the journalist secretly represents an opinion or a political or economic interest and promotes it by deceiving it as something that can be taken as the naked truth. If we accept that half-truth is a lie, they present incomplete evidence of the 5 W and 1 H's of journalism (who, where, what, why, when, and how). Muller (2016) identifies that the media, due to financial gain and interest relations, adopt news-like and conflict-of-interest content practices through hybrid journalism to promote products, political opinion, ideology, religion, and more. With the latitude left by hybrid journalism of multiple media assets, platforms, and tools, as Splendore and Brambilla (2021) argue, publishers incorporate these practices into their commercial policy or media governance without regard to the high credit risk they assume. In this context, it is helpful to consider that the effort to tackle misinformation also should include incomplete information and propaganda.

In the field of ethical hybrid journalism and media, important challenges arise, such as what is the role of moral norms of journalism in today's media landscape, which is driven by low economic power and intense competition among many media sources that broadcast news in various forms seeking to capture the attention of the public? It is, therefore, questionable whether the ethical norms of journalism can coexist in a time-pressured environment in which media sources have the added pressure to "sell out" to act at the expense of their competitors.

The media and social media as intermediary providers are 'frenemies'. They exchange content and have a particular transaction (even if it is an unequal one), which, without guaranteeing a substantial improvement but rather a minor correction in the economic relationship, is further strengthened in Europe by the

legal framework (EU Directive 2019/790) for the related rights of publishers and the share of journalists (content producers). However, it is a common assumption that social media and the business models built around them are not designed to promote or highlight streams of reliable and authoritative information in the way journalism achieves to do so. The media moves slower than the lightning-fast publication of information on social media. This results in media derailing when attempting to become more competitively synchronised with social media. At the same time, many associations of European publishers are considering ways to develop alternative business models, but most still look to the billions of users of the platforms. Nevertheless, as Frederic Filloux (2018), a French media commentator in the US, eloquently notes, a change of course by the media industry would enable them to reinvest time and resources in things that create good journalism, according to White (2018). A central question that emerges from the growth of digital media is to what extent the current ethical codes of conduct are appropriate for present and future media, which are immediate, interactive, and always on, i.e., journalism for professionals and amateurs alike. According to Karcher (2009), codes of ethics must be reassessed and redesigned with today's media in mind, not yesterday's, as the digital 'revolution' has created ethical trends on two levels. At the first level, the contrast between traditional and online journalism is encountered. The culture of traditional journalism - the values of accuracy, pre-publication confirmation, balance, impartiality, and the role of the "gatekeeper" of the information gates - is confronted with the "mores" of online journalism, namely immediacy, opacity, bias, non-professional journalists and, post-publication, non-existent correction policy. Similarly, the second level highlights the contrast between local and global journalism. The following questions arise, according to Karcher, about whether journalism has a worldwide impact and what its global responsibilities are; also, whether codes of ethics should redefine their purposes and rules to guide the journalist who now has worldwide resonance and influence.

The ethical rules of the journalistic profession face the challenge of adapting to the requirements as they are shaped in the context of the development of dimensional technology, augmented reality, and interaction within such augmented reality environments. Madary and Metzinger (2016) argue that the potential for deep manipulation of behaviour through such technologies is high, and the impact of experiences in the virtual environment on real-world behaviour could be significant. Contributing to this is the fact that the current guidelines for the audience are often unclear, so according to Laws and Utne (2019), the new responsibilities that journalists and news organisations take on when placing the

audience at the centre of the event using virtual media should be discussed, as well as the idea of the audience as a passive recipient who is relieved of the burden of taking moral responsibility when consuming news.

The development of technology and the influence of the advertising 'market' on the media function are progressively weakening public trust in journalism and the promotion of reliable information. Nevertheless, this 'condition' represents an opportunity to support a new agenda for change in journalism. According to White (2018), the Ethical Journalism Network highlights that critical priorities in any strategy to strengthen journalism should be ethics, digital literacy, sustainability, loyalty, and accountability. Given the above and the fact that digital media dominate, ethical governance cannot but be concerned with updating Codes of Ethics in the new context.

The role of Interest Parties and Stakeholders

A fundamental and integral component of a democratic system is the mass media, which constitute and express the 'voice' of citizens and shape, to a large extent, not only public opinion but also the framework of society as a whole. The Media seek to produce or transmit news and entertainment messages. They can perform both tasks: creating the content product or service and making it available to the public. Depending on their position in the value chain, some are intermediaries, such as production companies and news agencies, whose clients are other media companies. In contrast, others are directly related to the audience, the end-user media owners. Both intermediaries and end-user media survive in the market if they gain a lasting competitive advantage. This is achieved by offering something of value to the audience that actual or potential competitors do not copy easily. According to Sánchez-Tabernero (1998), competitive advantage derives from a team's expertise or skills: experience in content production, proximity to the market, technological capacity, innovative spirit, and ability to discern and identify what competitors are doing.

As an information gathering and public information provider, media have evolved into an essential societal actor and a key stakeholder within an ambiguous social, cultural, political, and business context. Having a strong influence on information exchanges and asymmetries between business and society, the media, say Voinea and van Kranenburg (2017), have become a primary stakeholder for organisations because they a) provide a social direction to other stakeholders facing a situation of uncertainty due to the ambiguous nature of the information they receive, b)

handle issues of paramount importance and pressures of various stakeholders through agenda setting, c) influence the social construction of reality concerning the activities of other organisations; d) project the public's knowledge and opinions about organisations; and e) influence organisations with their knowledge and opinions.

The peculiar character of media organisations is rooted in the fact that their activities are inextricably economic and political and are highly dependent on ever-changing technologies. These activities include the production of goods and services that are often both private (consumption for individual personal satisfaction) and public (considered necessary for the functioning of society as a whole as well as the public sector). What the media do or do not do matters to communities, and this is reflected in complex systems of ideas and various mechanisms to encourage, protect or restrict them on behalf of a supposed 'public interest.' Nevertheless, the media are required to operate wholly or partly following the guidelines of the market economy. Even in this aspect, they may, according to McQuail (2008), attract the attention of governments for the same reasons that other private enterprises are subject to various forms of legal and economic regulation.

They influence economic and social interaction through the exchange of information between different stakeholders and society at large. They disseminate and present stories, ideas, and information about business practices by shaping other interest groups' image, reputation, and legitimacy. From a rational perspective, stakeholders can interact with the media ad hoc when their activities are affected. However, according to Voinea and van Kranenburg (2017), from a stakeholder strategy perspective, it is argued that ongoing management is necessary because the media is a primary stakeholder in helping other parties achieve a competitive advantage.

Media organisations are increasingly aware of the weaknesses of anyone in a position of power. They compete with many other rivals who constantly develop new ways to deliver information and entertainment to the public. Inevitably, a lack of initiative and dynamism can quickly lead to stagnation and decline. Small organisations with a low international profile cannot compete in certain areas - music, the film industry, cable, and satellite television - with the big media groups. For this reason, growth strategies are the route they choose to avoid being put out of the 'game' by larger competitors. According to Sánchez-Tabernero (1998), the priorities and the growth model can only be decided after internal and external analysis.

The media develop accountability and credibility relationships with other interest groups. There are two distinct stages of these relationships: internal and external. The internal dimension involves a chain of control within the media so that specific

acts of publication (news texts, television programs, etc.) become the responsibility of the media organisation and its owners. On this basis, however, important questions arise regarding the degree of autonomy or freedom of expression of those working in the media (e.g., journalists, writers, editors, and producers). Any tensions that arise over these issues 'within the walls' of the press are often resolved in favour of the media owners. Internal control can be too strict (protecting the organisation from claims) and accompanied by censorship or evolve into being too oriented towards serving the interests of the media rather than society. External media accountability and credibility relationships are developed with stakeholders affected by or interested in a publication. From a simple enumeration of the main potential partners (McQuail, 2008), the resulting relationships are typically between the media and their audience, customers, and suppliers, those who are the subject of reporting, owners and shareholders, regulatory and governmental authorities, social opinion organisations, and various pressure and special interest groups affected by publications.

According to Freeman's (1984: 46) approach, stakeholders are defined as "any group or individual who influences or can influence the achievement of an organisation's objectives." This constitutes the broad sense of a stakeholder, while the narrow sense is 'any identifiable group or individual on whom the organisation depends for its continued survival.' Gradually Freeman's definition was expanded to include groups that have an interest in an organisation regardless of the interest in them, or conversely, to restrict groups to those that contribute to the organisation's financial bottom line. At the same time, critics of the theory claim that it does not make clear who is a stakeholder and who is not, and in particular, that it focuses heavily on the importance of meeting the needs of all stakeholders without specifying who the stakeholders are or how they can be identified. Therefore, stakeholder management needs to move towards a 'names and faces' orientation with specific identification and communication with stakeholders. Moreover, according to Rawlins (2006), employees, customers, shareholders, communities, and suppliers are usually classified as organisational stakeholder groups.

Stakeholders are all those interested in an issue with which they have developed a direct relationship. Typical and easy-to-develop relationships exist for primary stakeholders, i.e., internal (employees) and some external stakeholders, including customers, partners, or shareholders. However, the definition extends relationships beyond primary stakeholders to include all or secondary stakeholders affected by an organisation's projects and activities. Nevertheless, while classical stakeholder theory identifies a set of relevant stakeholders, studies indicate that the focus is

mainly on customers. The basis for stable and prosperous stakeholder engagement is oriented and two-way communication with the target groups. In addition, stakeholder engagement requires a structured approach based on their needs, influenced by their relationship with the organisation. In addition, Krumboltz and Geyer (2016) note that different factors influence the success of stakeholder engagement, for example, the level of communication, the willingness of the organisation to integrate stakeholders in decision-making, and the needs of the specific stakeholder group. Stakeholders are empowered when they can influence other stakeholders to make decisions they would not otherwise have made. Power is categorised as a) coercive power based on physical sources of power, b) coercive or restraining power, c) utilitarian power based on material or economic resources, and d) normative power based on symbolic resources. In terms of its legitimacy, this is determined by whether the stakeholder has a legal, moral, or presumptive claim that can influence the organisation's behaviour, direction, process, or outcome. Furthermore, according to Rawlins (2006), stakeholders are risk-takers who "have invested some form of capital, human or financial, something valuable in a business." At the level of theoretical analysis, three generations of interaction with interest groups can be distinguished. The first-generation companies did not interact but responded to specific interest groups that put pressure on them. This reactive approach aimed to prevent bad publicity and protests from these groups while trying to calm down critical voices. The second generation was characterised by a more proactive approach, in which companies wanted to increase the degree of understanding about competitive forces through interaction with stakeholder groups. Companies will create or maintain their strategic competitiveness in third-generation stakeholder groups by aligning social, environmental, and economic performance. Therefore, Hoffman and Lutz (2013) state that stakeholder engagement can be understood as an emerging management function.

In the era of traditional news broadcasting, stakeholders were limited to four main participants: a) the TV networks, b) the audience consuming the TV content, c) the rating companies, which created a common denominator for those who watched the TV programs, and d) the advertising companies that negotiated with the networks to buy advertising in their programs. However, when distribution of television content evolved in the form of a cable/satellite model, the distributor emerged as a new and vital participant. As television entered the era of OTT - a multimedia streaming service offered directly to viewers via the internet, which bypasses the cable, broadcast, and satellite TV platforms that traditionally acted, according to Malthouse, Maslowska and Franks (2018), as controllers or distributors

of such content - new distributors are emerging, such as streaming services and smart TV apps, as well as new audience data providers that originate outside established oligopoly media measurement companies. Regulatory government authorities and their counterparts in the media industry are two more interest groups influencing the media system considering the DAD (Decide - Announce - Defend) model⁶³. Various technological, social, cultural, and economic factors affect the current situation and its potential alternatives. Towards this end, perhaps the most important regulation is the European Union's General Data Protection Regulation (GDPR)⁶⁴, which implements strict privacy safeguards that affect how data can be used to make automated decisions.

The massive expansion of the supply of multimedia and services in recent years and the explosion of rich audio-visual content distributed online facilitates new forms of competition for profit and prestige. It also highlights new benchmarks for quality and innovation, which, according to Lowe and Martin (2014), are far removed from the usual remit of traditional broadcasters and regulations for traditional broadcasting.

THE RELATIONSHIP BETWEEN ETHICS AND GOVERNANCE

Governance as "soft law"

Vagelis Papakonstantinou

The concept of "soft law" comes, according to Boyle (2019), from the field of public international law. Initially, it was an apt description for non-binding normative legal documents related to international relations. Peters and Pagotto (2006) identify that its practical introduction is attributed to the lack of formal law-making capacity among subjects of the international legal order. In the scope of European Union law, Senden (2005) records that 'soft law' is defined as 'rules of conduct laid down in

63. DAD (Decide-Announce-Defend): it is a minimally participatory method of public administration. It is often used to deal with emergencies, as decisions are made through a hierarchy and do not require consensus. Generally, the top of this chain of command is held by a group of experts who base their decision on scientific or technical analysis. <http://www.asset-scienceinsociety.eu/pages/decide-announce-defenddad#:~:text=DAD%20is%20the%20Decide%2DAnnounce,not%20everyone%20agrees%20with%20them>

64. GDPR (General Data Protection Regulation): regulation of EU legislation on data protection and privacy in the European Union and the European Economic Area. It also addresses the transfer of personal data outside the EU and EEA territories. <https://eurlex.europa.eu/eli/reg/2016/679/>

acts which are not given legally binding force as such, but which may nevertheless have certain - indirect - legal effects, and which are intended to and can produce substantive effects.'

In the context of domestic law, a substantial attempt to define "soft law" was made by the 2013 annual study of the French Council of State, entitled "Le droit souple" ("The soft law"), which stipulated that "soft law" instruments must have three cumulative conditions. In particular, these instruments (a) intend to modify or direct the behaviour of their recipients by ensuring their support, (b) do not in themselves create rights or obligations for their recipients, and (c) their formalisation and structure are similar to legal rules. As further clarified in the study, the first criterion distinguishes "soft law" from opinions, the second criterion marks the boundary between "soft" and hard law, and the third criterion intends to distinguish "soft law" from non-law.

A comparative study among thirteen EU Member States legal systems showed that most national courts consider appeals against "soft law" instruments inadmissible in principle. However, in most of these jurisdictions (regions), a person can bring an action against an administrative act by relying on "soft law" instrument. There are also cases where an administrative act is *prima facie* non-binding but has a binding effect on individuals. In this respect, the Belgian Council of State decided that an application for an annulment, even against a *de facto* binding administrative act, could be admissible, subject to specific criteria.

They are treating 'soft law' instruments as exceptionally admissible before national courts should not diminish the importance of their procedural law. In particular, the parties regularly use non-binding legal texts as a reference point for proving compliance with a legal formula. In administrative courts, public authorities defend their acts as being based on certain "soft law" administrative texts, such as circulars. Similarly, in civil or criminal jurisdiction, the parties usually prove the appropriate standards followed in a particular market sector by relying on the provisions of non-binding legal texts. Finally, according to Hartlapp and Hofmann (2020), non-binding law is also often used by national courts as a means of interpreting the legal rules under consideration in court.

CONCLUSIONS

The documentation of a virtuous public mission, whether of the media or journalists, could be based on a model of ethical self-regulation. Without this, and especially the observance of ethics, the media, because of their decisive role, may

negatively influence the public, and citizens may face the moral hazard of poor or incomplete information. This asymmetry in access to good information strikes at the core of the media industry's ethics concept since the distinction between good and evil, right and wrong, is not evident. The safeguards citizens need to form opinions and make critical decisions about their lives freely can only be provided by journalism informed by facets of the public interest and in service of an inclusive society. Independent journalism avoids social divisions without exclusion in public discourse. C.P. Scott's 1921 dictum that the medium is not only a business that must survive, but an institution that reflects and influences the life of an entire community, multiplies the responsibility for both the medium and media practitioners in today's globalised communication environment. Commitment, mutual agreement, responsibility and accountability, and voluntary adherence to standard practices, therefore, define responsible governance that recognises the role of the Media Industry, taking into account the multiple decision-making centres, expectations of a plurality of stakeholders, common points of interest among these stakeholders, and the prospects of shared power and shared responsibilities. Otherwise, according to Chakravarty and Sarikakis (2006), media without strong ethical governance reinforce the power of regimes and economic interests.

Regarding the character of the ethical framework, it is crucial that in European law, it is interpreted either as rules of conduct that can have indirect legal effects or as the result of three cumulative conditions, such as directing behaviour, creating rights and obligations, and resembling legal rules.

The concept of ethical governance is not self-contained in media ecosystems. Similarly, it is not a self-existent and independent concept of governance of a media outlet. It is a dimension of the idea of quality and, more precisely, it is a necessary component of total quality governance, as in the media industry, it is not enough for journalists to be ethically committed, but rather for the corporate commitment to social responsibility, which should define the entire management system in all processes within the organisation. Besides, the connection between the human element and the company's vision is the organisation's culture, as highlighted by Mitra (2016). Culture includes the beliefs, values, rules, and norms that govern an organisation. Based on these, ethics in journalistic management cannot guarantee that the newsroom will not be subjected to pressures, primarily from shareholders and secondarily substantially from stakeholders. Also, conceptually, ethics do not add to quality but validate it. It is essential to underline that the media are organisations primarily associated with moral responsibility and ethics. However, technology shapes the product and the ways in which it is made available to the public.

Codes of Conduct and Guidelines have a dual role as governance instruments. They are internal laws with an application that indirectly (sometimes directly) affects the external environment of the entity that will apply them. They are laws without consequences and obligations to comply with the logic of the coercive application. This dual character gives them the designation 'soft law.' Specific provisions of soft law are directly related to law. However, soft law, i.e., the moral rule, is a component of law and possibly a precondition.

In the media, many guidelines for a journalist's conduct in the Code of Conduct relate to criminal and civil law. Causing harm to the public and making inappropriate life decisions by an individual due to misinformation, however, may not always be treated as a matter of law, even though it transfers moral hazard to the individual. However, in a court of law, the content of a Medium is reviewed for spreading false news, publishing personal information, exposing a minor to danger, and more. Therefore, journalistic values are consistent with the law.

Legitimacy is therefore influenced by the ethical values that have been voluntarily transferred and implemented through a guideline or a provision of a code of conduct. Morality can influence opinions about good and bad law, as it does about right and wrong or right and wrong. Besides, even when a judge judges by interpretation or a jurist gives an opinion, they behave undisciplined in the law by focusing on the moral values of right and wrong. Therefore, when observed, journalistic ethics, having the character of common law, acquires a two-way relationship of reinforcement with the law and assists the application of the law. In this sense, and because ethics is a component of the quality of the information released, the ethics of the medium is linked to the quality of the news, and the industry's self-regulation is linked to the regulatory and legal normative provisions. The deregulation produced by this dialogue of a self-regulating medium with ethical and quality standards leads to the satisfaction of the public interest and the expectations of stakeholders, especially the public. The above findings do not only apply to journalistic ethics but also to the ethical governance of a medium. For example, transparency in media ownership is directly related to the rule of law. This is because over-concentration directly affects pluralism, an element essential for informing the citizen and fulfilling the constitutional obligation to be provided with all information opportunities to formulate a public position freely.

Part Three

QUALITY IN GOVERNANCE

Total quality management is composed of three levels. “Total” refers to the fact that all company activities are included in the optimisation process, i.e., processes, personnel, management, suppliers, and the public. “Quality” refers to the objective of increasing the efficiency and effectiveness of the company. Management (should) aim/s to align the entire business with customer expectations and refers to continuously readjusting the company’s processes. As a management tool, a comprehensive ethical governance plan should act as a means of limiting costs to the extent that fraud, waste, and abuse are reduced. The next part discusses a method of monitoring and controlling organisational performance and compliance with standards, such as quality assurance systems and quality management standards.

Management tools are divided into two categories based on their purpose and choice of use. Those voluntarily incorporated by a Media Organisation on its own initiative for strategic quality and those that are joined by larger groups of organisations with shared values and objectives and, above all, common interests. The first category includes internal quality assurance systems with specific statutory guidelines, requirements, and procedures, such as ethical compliance, transparency and accountability practices, and responsible journalism presumptions. In the second case, these are common frameworks of self-commitment of similar media enterprises, which agree on common rules of operation, ethical standards, fair competition, and ethical self-regulation, which are inspectable and certifiable by independent accredited bodies. The third part examines quality assurance systems, identifies individual media and collective organisations’ case studies, and lists international and European standards that can be inspected and certified.

HOW QUALITY IS ASSURED

Quality, a broader concept that incorporates ethics, may relate to the governance of the medium and therefore implies the satisfaction of total quality requirements throughout the organisation, or it may relate only to content quality issues where the concept of ethics is connected to compliance with journalistic standards. The concepts of quality management, according to Wyss and Keel (2009), exist in various forms: an example is the self-assessment model of the European Foundation for Quality Management (EFQM 2008), which, according to Wyss (2002), meets the requirements of the Total Quality Management (TQM) philosophy and has been

considered as the framework for continuous improvement of organisational quality management. The TQM approach defines quality as the goal of an integrated management strategy, in which all individual strategies aim to increase quality by developing quality criteria, putting them into practice, and maintaining them. The three main objectives are completeness, orderly processes, and performance evaluation. Quality management requires a control process. An improvement can only be recognised as such if specific quality objectives are formulated from the outset, against which the level of quality achieved can be measured. All quality management concepts have in common that quality assessment, through quality assurance practices, must focus on specific standards. Media organisations must adopt these standards if they aim to contribute to the quality assurance process systematically. According to Wyss (2002), media organisations must commit to a culture of accountability and identify and pursue critical quality orientations and processes by implementing a quality management system. A quality management system, therefore, includes, at a minimum:

(1) Quality policy, where management should provide evidence of its commitment to clearly defined core values. The management's policy should be in the form of a public document reviewed at least once a year. This document could include an editorial charter of commitments to independence, transparency, and accountability, a code of conduct, a mission statement, a code of advertising, and a description of stakeholder relations.

(2) Resources and processes, where management will identify and document all processes that have a direct impact on the quality of editorial content, the relationship with advertisers, the relationship with content suppliers, the measurement of audience and listener/viewer satisfaction rates, and the management of human resources. The organisation should pay special attention to measuring audience satisfaction, establish a content evaluation audit, and have a Public Editor or Quality and Ethics Committee.

Content Quality control method

According to Bachmann et al. (2022), measuring media quality is a difficult process since evaluation criteria are linked to variable beliefs about the ideal of quality and the expectations from an organisation cultivated by the audience. Spontaneous response beliefs may present valid information, the degree of original content, inclusiveness, and contribution to society and democracy. Quality is, however, complex and requires contextualisation, measurement and evidence.

Media quality can be understood meaningfully when anchored in models of supporting democratic deliberation, such as – but not exclusively - Habermas’ ideal of deliberative democracy. Furthermore, Public Value as a concept can provide a method of assessing the quality of a Medium, as it captures the contribution of the Medium to a functioning, vibrant democratic society. The research project by Gladney et al. (2007) attempted to assess the quality of online media content based on 38 criteria with different weighting. The University of Washington’s ARTT analysis framework methodology included 15 criteria of different ratings. However, to measure the quality of the content and, by extension, the medium, according to the methodology of the study in Swiss media by Bachmann et al. (2022), it is necessary to assume that media quality is a relational construct (Jandura and Friedrich 2014:352). In this methodology, quality is measured in terms of relevance, thematic framing, professionalism and inclusion. Relevance refers to the ideal that general issues should take precedence over specific issues and social issues over private issues. It encompasses the dimensions of: a) relevance of the issue and b) relevance of the entity/subject matter. Yet, we would argue here that the dichotomy of public vs private issues ceases to exist the moment violation of human rights and fundamental freedoms remain unaddressed under the category of ‘private’. For example, domestic violence, which was considered a ‘private’ affair, is neither specific nor private.

According to Bachmann et al. (2022), the News Medium Relevance score is calculated as an index of topic and entity/subject relevance, which considers that the two dimensions are not intended to offset each other. For example, a news story about politics (10 points) that presents private aspects of a politician (1 point) receives a low relevance score (i.e., 1 according to the formula) rather than an average of 5.5 [i.e. $[10+1]/2$]. All scores are also transformed to range from 0 to 10 again. For the multiplier indicators, this is achieved by dividing the scores by 10:

Category – Subject	Degrees of relevance
Policy	10
Society-Economy	9
Culture	9
Sports	4
Human Interest	3

Table 2. *Relevance performance indicators by subject category, according to Bachmann et al. (2022)*

Category of entity/subject	Degrees of relevance
Society (global and functional systems)	10
Organisations - Institutional bodies	8
People (in functional roles)	6
People - private aspects	1

Table 3. Subject relevance performance indicators, according to Bachmann et al. (2022)

Based on the methodology of Bachmann et al. (2022), the following mathematical formula is derived:

$$\text{Correlation Coefficient} = \frac{\text{Correlation of Theme} \times \text{Correlation of Subject}}{10}$$

According to Bachmann et al. (2022), there are two dimensions to contextualisation:

- Thematic orientation: presenting content that provides the audience with sufficient information about the broader context and background.
- Interpretive performance: presenting content that provides interpretations in a way that supports the democratic opinion-forming process, as well as the understanding of the interpretations and views of the actors involved in a news story.

The score regarding the quality of the Thematic Framework is calculated by Bachmann et al. (2022) as an additive indicator of the variables mentioned above. Slightly more weight is given to the variable Topic Orientation since this variable further reflects the journalists' investment in investigative reporting. The additive index assumes that the two variables complement and offset each other:

Thematic Orientation / Thematic Classification Lyengar [1991]	Value of content in Points
Presentation of events with reference to value - outcome relationships (social impact)	10
Presentation of individual events not part of a wider context	2

Table 4. Indices of content value by subject orientation, according to Bachmann et al. (2022)

Interpretive Performance (type/form of news)	Index measuring opinion formation in Points
Research	10
Interpretative presentation and analysis	10
Commentaries - Articles presenting and justifying subjective opinions	10
Interviews	9
News bulletins	8
News containing external material that has only been partially edited	5
News containing only external content (e.g. agency copies)	1

Table 5. *Indicators of performance in shaping public opinion, according to Bachmann et al. (2022)*

The above assumptions and the KPIs of Bachmann et al. (2022) lead to the mathematical formula of thematic framing:

$$(\text{Thematic orientation} \times 0,6) + (\text{Interpretative performance} \times 0,4)$$

The criterion of professionalism refers to socially and democratically based quality standards rooted in the very concept of professional journalism. The professionalism of reporting is measured by Bachmann et al. (2022) by the variables:

- Objectivity (news with a dominant style of argumentation)
- Invoking sources in reporting (other editors, media, or news agencies)
- Primary Reporting (depending on the extent to which it focuses on external services, such as the use of agency material, or is carried out by in-house means)

The quality score on the professionalism dimension is calculated as the multiplicative index of the variable “objectivity” and the additive index of the variables “appeal to sources” and “primary reporting”. This method assumes that source citation and independent reporting are considered complementary variables, while objectivity is considered non-compensatory of the other two variables. This means that a news story of low cognitive-argumentative value should, in any case, be rated low, even if the source is cited and a staff member produces the story:

Objectivity	Value of variable in points
Case in which the arguments must be weighed objectively against each other	10
Evidence with moral-emotional messages focusing on emotions	2

Table 6. *Objectivity performance indicators, according to Bachmann et al. (2022)*

Reference of sources	Value of variable in points
Clear reference to the sources of the news content (e.g. name of the author, abbreviation, reference to a news agency)	10
No clear reference to the sources of the news content (no mention of the name of the author, etc.)	1

Table 7. *Indicators of content value based on sources, according to Bachmann et al. (2022)*

Primary Reportage	Value of variable in points
Coverage by internal editors/editors (independent of external services of content providers)	10
Information from (other) staff members as well	9
Texts by guest editors or external experts	7
News produced in the framework of interdepartmental editorial cooperation	5
News items only partly edited by staff members on the basis of external material (e.g. agency material)	3
News items based entirely on external content services (e.g. agency content)	1

Table 8. *Primary content value indicators, according to Bachmann et al. (2022)*

The method chosen by Bachmann et al. (2022) gives the formula for calculating the professionalism index:

$$\text{Professionalism score} = \frac{\text{Objectivity} \times ((\text{Source transparency} + \text{Ownreporting})/2)}{10}$$

Diversity (equality, plurality, diversity, inclusiveness) is a dimension of quality, which, as Bachmann et al. (2022) point out, is not measured at the level of a news item (the previous indicators), it does not appear in every news item, but in the set of all news items of a particular media outlet. The indicators used to measure the Diversity of a media outlet are content diversity and spatial diversity. Content diversity is based on news-level codes. It is formulated through combinations of categories of the variable's thematic relevance, relevance to the operator and contextualisation (thematic orientation). To quantify the quality of content diversity, they define a reference distribution, which should reflect an ideal normative distribution, but also represent an empirical-realistic target that a news media can achieve in reality.

Bachmann et al. (2022) define a balanced ideal distribution, which assigns a weight of 12.5% to each of eight categories Politics/Macro Current news 12.5% - Politics/Macro General context 12.5% - Politics/Meso 12.5% - Politics/Meso 12.5% - Politics/Meso 12.5% - Economy/Macro 12.5% - Economy Meso/Micro 12.5% - Arts and Culture 12.5% - Sports and Media 12.5% - Arts and Culture Human Interest 12.5% (Politics Macro Current news 12.5% - Politics Macro General context 12.5% - Politics Meso 12.5% - Politics Micro 12.5% - Economy Macro 12.5% - Economy Meso/Micro 12.5% - Arts and Culture 12.5% - Sports and Human interest 12.5%). According to the deliberative theory, they give more weight to the policy area in terms of diversity of content. This manifests itself in four versions of politics (micro, meso, general macro context, general macro news), which should be covered in a balanced way, i.e. 12.5% each. Because of the economy's central importance, they also prioritise this area and assign it two categories (meso-micro), which must be covered in a balanced way, i.e. 12.5% each. The areas of culture (arts and culture, sports and human activity) and human interest are also ideally weighted at 12.5% each. Thus, the scoring considers human interest content a legitimate subject area for reporting. The normative rationale behind this is that the media must attract the public's attention for whom human interest content is essential. However, human interest content should not take precedence in reporting.

The second diversity indicator, spatial diversity, measures the extent to which a news medium covers different geographical areas of coverage. A distinction is made between the characteristic values:

- (1) Regional,
- (2) national and multilateral,
- (3) international,
- (4) multinational.

To make all news media considered (local and national news media) comparable in terms of this quality dimension, “local coverage” can be excluded from the assessment of spatial diversity, and the relevant indicator can be measured in terms of convergence towards a balanced coverage of the three geographical characteristics: national/international, foreign and multinational. In the balanced ideal distribution, the three characteristics each receive a weight of 33.3%. According to the deliberative theory of democracy, we assume that the media should report events in a balanced way across these different geographical reference levels. Both diversity indicators are quantified based on the Shannon (1948) formula for measuring diversity. Content diversity and spatial diversity are calculated according to the following formula:

$$\text{Diversity score} = \frac{\text{Diversity of content} \times \text{geographical diversity}}{10}$$

Other noteworthy methods

In the research project of Gladney et al. (2007) on digital news, an attempt was made with the participation of editors from newsrooms of different media types to evaluate the quality assessment method in online media content. The 38 criteria were ranked with different weights (the first 12 were rated as more important than the last 12). Although it is a method worth studying, it requires more effort and a larger and more representative sample of respondents who are very familiar with the distinction between certain criteria. It also requires the same high level of journalistic competence and ethical constitution. This means that the higher the level of expertise required to score so many important criteria, the more significant the gap between the ability of an external party or, even better, the public to understand the differences and evaluate the content. Among the most critical findings from such a methodological approach, one could include the finding that validity and usability (usefulness) remain very important qualitative criteria for both traditional media and content in digital media.

<p>CONTENT</p> <ul style="list-style-type: none"> • Reliability • Utility • Immediacy • Relevance • Separation of fact and opinion • Exclusivity • Good writing • Good illustrations • Depth • Width • External commentary • Editorial vigour <p>NAVIGATION</p> <ul style="list-style-type: none"> • Ease of use • Clear routes • Speed and efficiency • Familiarity • User selection/control • Quick reading 	<p>LOOK AND FEEL</p> <ul style="list-style-type: none"> • Simplicity • Primary content • Appropriate design • Employability • Tip of the spear <p>FUNCTIONALITY</p> <ul style="list-style-type: none"> • Power search • User requirements • Technological relevance • Approach • Range <p>COMMUNITY RELEVANCE</p> <ul style="list-style-type: none"> • Hypertext • Community • Citizen participation • Political/public dialogue <p>INTERACTIVITY</p> <ul style="list-style-type: none"> • Access to editorial staff • Space for ideas • Multimedia wealth • Adaptation • Interactive reading • Community dialogue
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Table 9. Importance of content by category of the 38 criteria according to Gladney et al. (2007), scoring from 1 as not at all to 7 as very important (Likert scale).

Another approach to measuring news quality is the University of Washington’s ARTT analysis framework methodology, which is largely derived from traditional journalistic standards and can be applied to news of any topic or genre. The method, last updated in June 2022 (in response to infodemics and vaccine misinformation), represents, as stated, an integrated approach to quality, emphasising how accuracy, transparency, impartiality, source credibility, and language work together to create high-quality public information.

Methodology and references

The development of this method to assess the quality of vaccine journalism was based on academic research, consultation with journalists and technologists, and

input from collaborative laboratories. The structure emerged from both previous classification work and contributions from panels hosted by the 2020 News Quality Initiative.

Based on these findings, the ARTT team defined an initial set of indicators and drafted a corresponding questionnaire. Experts in various related fields were then consulted for review and feedback, either directly or in semi-structured workshops. This group included science and public health journalists, World Health Organisation's Vaccine Safety Network (VSN) members, experienced editors in the Wikipedia community, and a stakeholder from a technology platform. The questionnaire was also presented at the International Journalism Festival (IJF) workshop in Perugia, Italy, in April 2022. During this iterative process, the categories and indicators of the questionnaire were continuously revised and validated, resulting in the following first version of this framework.

The method of evaluating journalistic content generally seems to identify the key issues and performance indicators in digital news content. Criteria for evaluating the quality of digital content art Analysis Framework⁶⁵:

- Accuracy (article) - Can the proof of inaccuracy be found?
- Multiple (independent) sources (article) - Is more than one source cited?
- Circularity (article) - Is circularity at the source avoided?
- Substantiation of a claim (article) - Are claims substantiated?
- Press release (article) - Is it a press release?
- News/opinion (article) - Is it marked if it is an opinion?
- Linguistic grammar and style (article) - Is it well written?
- Appropriateness of title (article) - Does it capture the main news? Is it neutral?
- Reliable source (Source) - Does it come from a source with a history of inaccuracies?
- News/opinion split (Source) - Does it come from a source that highlights the opinion?
- Transparency - Breaking News (Source) - Is it reported that events are unfolding?
- Revelation (Source) - Is there a recent source with the revelation?
- Correction/Complaint Notification (Source) - Is there a way to notify of a correction or complaint?
- Evidence of corrective practice (Source) - Are there many instances of correction by the medium?

65. Art Analysis Framework, <https://artt.cs.washington.edu/analysis-framework-vaccine-news-quality/> accessed on 19/4/23

Quality Assurance through the Public Value Report

Another quality assurance model is followed so far by the Public Media, which has taken the form of the annual public value report at its core. This is a detailed report with characteristics of a universal account, accountability, and transparency, which presents the benefits of the operation of the institutions of an important institution for the citizen, society, democratic government, economy, culture, and, in general, the country. These reports do not only justify the public expenditure, or the cost of the subscription service provided but also keep values and ideals, ethics and national identity, linguistic richness, the European ideal, and culture at the forefront. The value added that public service broadcasters and digital media audiences get back is generated through the way good governance is presented and the production of high-value content.

The philosophy of the Public Value Reports is to present on an annual basis every aspect of the activity, every change in orientation, and every innovation of the public media. The large scale and historical depth of data capture are consistent with the timelessness of their public mission, such as the BBC pioneering the claim that public media produce value for citizens and society in its annual survey “BBC⁶⁶ Group Annual Report and Accounts” (2022), ERT⁶⁷ which in 2016, after its reopening in 2013, started to record the public value (Public Value Report, 2021) that it offers to Hellenic society and ORF⁶⁸. According to this model, a report is to be submitted annually to the Management that becomes the basic documentation of the Public Value Report of the Organisation.

The Public Value Report, based on the example of the three institutions, is organised across five dimensions. Individual Value, which translates into benefits for the citizen (reliable Medium, reliable information for all, barrier-free information) such as: a) Trust, b) Service, c) Entertainment, d) Education, and e) Responsibility. Social Value and Social Benefits (informed citizen, citizen service) in: a) Diversity, b) Orientation, c) Social Inclusion, d) Response to Challenges, and e) Culture and

66. Department for Digital, Culture, Media and Sport. (2022). BBC Group Annual Report and Accounts for 2021/22. GOV.UK. <https://www.gov.uk/government/publications/bbc-group-annual-report-and-accounts-for-202122>

67. ERT SA (2021, December 14). Public Value Report - ERT.GR. [www.ert.gr. https://www.ert.gr/dimosia-axia/](http://www.ert.gr/dimosia-axia/)

68. ORF Public Value. (2023) ORF quality assurance system ORF Public Value: https://zukunft.orf.at/show_content.php?hid=40andlanguage=en

Art. National Values (arts, universality, periphery) such as: a) National and civic identity, b) Added value. International Value and Corporate Value translated into the company's added value, new technologies, extroversion, transparency and accountability, staff development, innovation, and competence.

The contents of the Public Value Report may include, but are not limited to, the profile and vision of the Agency, financial data, programme expenditure, transparency and accountability report, impartiality report, public satisfaction, human resources data, content data, innovation and creativity report, corporate social responsibility report and quality control data.

How the Press Councils oversee Quality Assurance

The mission of the Press Councils is consistent with the individual control of a system of quality assurance of journalism of the media, its members, and in general, the independence and guarantee of freedom of the press. They monitor the commitment of media organisations to the principles of journalistic work, examine the relationship with the public, complaints, and grievances, impose sanctions, and demand transparency and accountability from their members. In this sense, the establishment of such a body greatly assists the self-regulation of the media in the logic of ethical governance and oversees important dimensions of their operation related to corporate quality assurance systems.

The Press Councils are fundamentally intermediate, arbitration-like bodies set up by the press (media and journalists) for common treatment issues and avoiding deviations from ethical and competition rules. A Press Council is a modern self-regulatory body for the press, which aims to ensure the quality of editorial work and guarantee the freedom of the press. Their function focuses on regaining an ethical edge and building good relations with civil society, empowering the media against excessive regulatory pressures, and promoting the interests of the media industry to policymakers.

In their operational framework, they standardise the methodology for monitoring the implementation of ethical and quality journalism in their members, defining the dimensions where particular attention should be paid to in each organisation. This means they are self-regulatory oversight bodies to establish commonly accepted methodologies, including those of audience measurement, and satisfactory responses to complaints and corrections by all members. In some of the requirements of self-regulation by press council members, such as putting ethics at the centre, it can be argued that there is a comprehensive approach that

goes as far as the continuous improvement of a code of ethics. The same applies to public satisfaction, especially when it relates to dimensions of content quality. According to a survey by AIPCE (2023)⁶⁹ of 29 Press Councils, such a body has an obligation to a complete and transparent picture of the issues of independence of the body and, by extension, the Media members. Transparency, meeting public expectations, relationship with regulatory and governmental authorities, giving the Council's and its members' decisions a character of due process, and finally, confirming compliance with journalistic principles and principles of legality.

In support of this, activity reports, decisions, and case statistics in the media that are members of the institutions are posted in detail on the websites of the Press Councils. In the Austrian Press Council (Der Österreichische Presserat), the published statistics⁷⁰ also offer the possibility of a comparative analysis between the member media.

A second example of how a Press Council oversees essential parts of its member media's quality assurance systems is the UK's The Independent Press Standards Organisation (IPSO), which also publishes statistics on complaints and violations of the Code of Conduct. According to the 2023-2028 Strategy Report, the Independent Press Standards Organisation⁷¹ awards the IPSO certification mark, which symbolises that media that bear it demonstrate that the ethical principles of the Code of Ethics regulate their journalism. The Council demonstrates its independence but also uses the term to signify the independence of publications and the journalistic mission.

MAPPING IN THE STANDARD ETHICS AND QUALITY MANAGEMENT SYSTEMS

Quality standards set the necessary rules for the production and characteristics that a product or service must have. According to the definition of the standardisation bodies: quality is the set of characteristics of a product or service that give them the ability to satisfy the expressed and implied needs of the user of the products or services. Quality management seeks to ensure a high level of quality in all areas

69. Alliance of Independent Press Councils of Europe (AIPCE) (2023) Comparative Data on Media Councils. Retrieved from Alliance of Independent Press Councils of Europe (AIPCE): <https://presscouncils.eu/Comparative-data-on-media-councils>

70. The Austrian Press Council, Statistics 2011-2022 https://www.presserat.at/show_content.php?hid=12

71. <https://www.ipso.co.uk/media/2308/ipso-corporate-strategy-2023-28.pdf>

that directly or indirectly impact customer satisfaction. By defining guidelines, Total Quality Management provides the basis for minimum rejection and maximum customer satisfaction. In quality assurance, only potentially negative effects on the quality of the final product are analysed and then, at best, eliminated. This ensures that the quality management standards are correctly observed and applied. The standards are international such as ISO, European from the CEN organisation, and national from the standardisation authorities of each country.

The International Standard Quality Management Systems

The Standard Ethics and Quality Management Systems examined in this study are primarily based on ISO 9001:2015 (Quality Management System). In ISO 9001 certification,⁷² the mark demonstrates the commitment to excellence in news media services. As a result, the organisation benefits through public satisfaction, staff commitment, team collaboration, ethical governance of utilising internal knowledge, continuous staff training, production innovations, research, and decision-making.

Another standard from which every industry borrows requirements and procedures is ISO 27001 (Information Security Management). Especially the protection of data and information systems is of vital importance also for the media industry. However, it was not included from the outset among the critical infrastructures that need urgent and intensive security. The media industry is vulnerable to risks related to privacy breaches, misinformation in the digital ecosystem, fraud, and malicious attacks. To eliminate cyber-attacks, the industry can implement the ISO 27001 certification⁷³.

The Standard Management Systems in Media

ISAS BCP9001:2016

Adopting the ISAS MEDIA Quality Management System⁷⁴ by a media organisation (radio, TV, newspaper, magazine, online, or other) is strictly voluntary. It is a move

72. ISO 9001:2015. Quality management systems - Requirements (2015). International organisation for standardisation. retrieved from: <https://www.iso.org/standard/62085.html>

73. ISO/IEC 27001 and related standards Information security management. (n.d.). <https://www.iso.org/>. <https://www.iso.org/isoiec-27001-information-security.htm>

74. 0 ISAS BCP9001:2016 (Media). (2016). isas.org. https://www.isas.org/index.php?option=com_content&view=article&id=209&Itemid=100020

to ensure that the organisation is managed in such a way that it meets the highest standards of quality in serving the public interest, serving its audience and advertisers, and working with other key stakeholders, including but not limited to:

- Staff,
- Content producers and other external providers and subcontractors,
- Owners and shareholders,
- Civil society,
- Public authorities.

According to the Standard, any quality management system applied to a media organisation must recognise the specific characteristics of the media industry, such as its social role, that it is subject to pressures from powerful stakeholders who may seek to influence its content, and that its business model is usually dependent on the support of the public and advertisers, whose interests do not necessarily converge. The quality of a media organisation cannot be assessed simply on the data commonly used in business, such as content distribution, revenues, or profits. Above all, any organisation that aspires to a quality standard must have integrity, be honest, fair, trustworthy, and aim to serve the public interest. In other words, it must be independent, reflect the diversity of society, listen to its stakeholders, be transparent in terms of ownership, be governed by editorial guidelines, and consider international standards relating to working conditions and social dialogue.

The internal culture and procedures of a media organisation should, according to ISAS Media, include:

- Clear mission and editorial vision for each publishing or broadcasting platform within the organisation; high-quality information and other content.
- Accurate reporting of the facts.
- Confidentiality of information sources.
- Distinguish between opinion and fact.
- Separation of advertising and editorial content.
- Widely publicised guidelines on ethics.
- Effective mechanisms for identifying and correcting errors.
- Responding to feedback from the public, advertisers, and other stakeholders.
- High-quality training and staff evaluation.
- A risk-based methodology that allows for mitigating the impact of uncertainties and threats.

Each process of the media organisation that has a direct or indirect impact on the quality of content should be clearly defined in terms of inputs, activities, outputs (added value) and controls.

Journalism Trust Initiative (JTI)

In 2021 the Journalism Trust Initiative (JTI) of Reporters Without Borders (RSF) was launched. The Journalism Trust Initiative (JTI)⁷⁵ is an international standard for promoting and advancing trustworthy journalism. It aims to provide a transparent mechanism to curb misinformation and provide tangible rewards for ethical and professional journalism. Its benefits, in line with its development initiative, positively impact all levels of the information production chain. The media assess their compliance with the standard, publish transparency reports and then receive independent certification. In this way, the JTI incentivises the media to improve how they operate, especially the production of content in the newsroom. Regulators and government agencies see the standard as an independent regulatory mechanism for allocating grants and benefits to the media. The JTI as a self-regulatory mechanism is based on objective criteria related to media transparency and professionalism of editorial processes, such as the application of an editorial guideline, the existence of content correction mechanisms, management of automatically generated content, internal/external control, transparency in the identity of media owners, financial autonomy and independence, proof of compliance with regulatory and professional guarantees.

The structure of the Standard on professionalism and responsibility is:

- Accountability for Journalistic Authorities
- Accuracy
- Responsibility for content provided by the public
- Responsibility for Sources
- Professionalism for Partnerships
- Internal Accountability
- External Accountability
- Professionalism in the media
- Education
- Publication of the Self-Assessment

The Introduction and Preamble to the Standard state that the ultimate goal of the Journalism Trust Initiative (JTI) is to support universal, individual freedom of opinion through access to information and independent, pluralistic media. By ensuring professional standards, a healthier digital media landscape is expected to emerge, from which every citizen, media worker, and society, in general, could

75. Journalism Trust Initiative: JTI. (2023). *Journalism Trust Initiative*: <https://www.journalismtrustinitiative.org/>

benefit. To meet the challenges, the Initiative aims to strengthen and safeguard journalism, assist compliance with ethical rules, approved journalistic methods, and guarantee independence. As stated, the Initiative believes in self-regulation, which requires agreed rules, standards or equivalents that act as a verifiable set of norms and benchmarks that define the profession's best practice. The preamble to the Guidelines states that the Journalism Trust Initiative (JTI) Standard can provide a useful tool for enabling trustworthy journalism if implemented by its intended objectives. The JTI is optionally certified following an external, independent audit by an accredited body.

EJN audit

The Ethical Journalism Network⁷⁶ has developed a tool that can help media outlets monitor their own performance and also help develop ways to improve public trust and market confidence. It is a form of internal audit, but one that is developed and implemented by the media themselves. The first set of requirements includes an understanding of the context and operation of the organisation, such as the corporate commitment to good governance and the ethical standards followed, such as the Mission Statement, Journalists' Codes and Corporate Codes, commitments to transparency and protection of editorial independence, editorial and commercial integrity, relationships with external regulatory bodies, quality policy and reward. In addition, qualitative and quantitative data on content production, cases documenting journalistic responsibility, and major issues highlighted by the medium are included. Another requirement in the first section asks for evidence of protection of editorial independence, a policy of separating commercial content and news, editorial independence, and guidelines for journalists to respect codes of conduct. The self-assessment plan includes the top requirement of having public satisfaction policies, qualitative and numerical data, and mechanisms for interaction and complaints reception.

The second section includes the details of the company, such as management and ownership, name and address, range of activities, board of directors, organisation chart, financial profile and shareholdings of the company and its owners, internal governance rules, corporate anti-corruption commitment statement, revenues from government sources, any political positions of the company, financial performance and impact data, and reports to the bodies supervising the operation of the media.

76. Law, T. (2022, August 22). *The EJN Ethical Media Audit*. Ethical Journalism Network. <https://ethicaljournalismnetwork.org/the-ejn-ethical-media-audit?swcfpc=1>

Data on industrial relations, trade unionism, employee training, gender equality, qualitative and quantitative staff data, and data on diversity and inclusion are also required. Data are also required on the safety and security of journalists and staff, training and awareness programs for reporting in danger zones, specific support provisions for female staff, medical and life insurance, and awareness of cyber threats and cyber abuse. The third section includes corporate goals and objectives, understanding the environment and risks and opportunities, and how the internal and external environment influence the organisation in achieving its intended goals.

Upon completion of the above, the organisation produces a report that can be used to promote the company's brand and its credible journalism. The transparency and accountability features of the report (Public Value formula) are also utilised as a marketing tool to encourage advertising, marketing trust, and public confidence. In particular, the report includes editorial performance and how this has enhanced the role of ethical journalism, also, how the medium ensures the right of the editorial staff to be independent, i.e., to work ethically and in accordance with their conscience. Furthermore, the obligations to comply with the code of ethics, how the editor-in-chief is selected, and his/her independence guaranteed, the system for monitoring and correcting errors, structure defining the editorial policy and dealing with internal violations of the codes and guidelines, as well as a policy on the use of social media.

The report should include information on the external environment, trends, and challenges and a transparent description of the financial data from advertising and government sources. The medium is required to reflect in the report information on the workforce by type of employment, employment contract, and region, broken down by gender and other characteristics, as well as data on collective agreements. Health, safety, and security data must also be reflected. A specific reference should be included regarding female staff, given the potential for harassment and intimidation. Staff training is also an important chapter of the report. In particular, publication of the policy by which employees are assessed and developed is required. The participation of women and, in general, the inclusion for documentary purposes of diversity as reflected in positions of responsibility and the participation of employees from minority groups. This section should also include data on the gender pay ratio. Another section of the report should include declarations of respect for national and international standards, as well as limitations on the rights of staff related to their work (for example, use of social media and political reporting), and how the concepts of Freedom of Expression, Human Rights, Culture, Intellectual Rights, Privacy, Corruption, Public Interaction, Advertising and Education are managed.

In addition, the report must include corporate policies on free trade unionism and collective bargaining, as well as internal grievance policies related to discrimination or other social and political rights of employees. A public position statement is required to be included in the transparency report. Information is also required on the content produced, its dissemination and overall impact, and whether there have been issues of inappropriate content or incidents that have given rise to complaints. The report must include any information relevant to the interaction with and satisfaction of the public. The commercial policy is also included, citing activity data and describing the corporate process of separating marketing communications (advertising and commercial activities) from editorial work. Training and awareness-raising activities for the public and employees must also be described.

Finally, the company's data protection and journalism policies must be made public, as well as details of any complaints of privacy violations or defamation claims against the company.

CONCLUSIONS

In the digital age, self-regulation, in whatever form and typology, contributes to the media's credibility to support the industry in regaining the public's trust, the transition to business models that ensure sustainability, and the quality of content. Each initiative helps guarantee freedom of expression and the promotion of the public interest. Quality assurance programs that focus on limiting deviations and risks to the minimum possible standards, press councils that reinforce the ethical dimensions and the role of the media in society and democracy, as well as applications for content quality control and certified methods of audience measurement, all build walls of defence against misinformation and propaganda, the serving of alien interests through the press and deepen democracy.

At the same time, the Media industry has at its disposal all the tools for good governance, continuous improvement, and sustainable development, such as international quality standards. With the foundation of the International Standards Organisation, ISO, and especially the ISO9001 orbital standard, the Media have the possibility to develop their own standards, either on their own or through groups, associations, and sectoral participation. In support of this, after the initial effort of the ISAS organisation with BCP 9001, which was incorporated and led to the certification of thousands of media in dozens of countries, a multitude of self-

regulatory frameworks based on the same values followed. However, they did not have standardisation and certification as an end in itself, but rather the acceptance of policy-making entities and regulatory authorities. Recently in the EU, Reporters Without Borders presented the JTI (Journalism Trust Initiative), which is an ISO 9001 structured certifiable management system, which after its approval by the European accreditation body CEN, it was mentioned as an example of a standard in the draft proposal for the European Commission's EMFA Regulation. At the same time, as part of its international initiatives to promote ethical journalism and responsible media governance, the Ethical Journalism Network presented the EJM Audit, which resembles a management system based on ISO standard structuring logic. In 2021 in a PhD thesis at the School of Economics and Political Sciences and the Department of Media of the Aristotle University of Thessaloniki, a similar study was carried out, which led to the EMGMS "ethos" project, elements of which are presented in the next section.

Under these circumstances, it follows that even the certification of an Institution with the ISO 9001 basic process quality standard assists its governance without, of course, guaranteeing its ethical governance in the Media ecosystem.

All these benefits are significant, but the most important ones are certainly related to ethical and quality management systems. In particular, the certified organisation becomes stronger in the face of a pressurised external environment, gaining a moral advantage in the face of conflicts of interest and disproportionate attempts at restrictive regulation. It is more responsive to public expectations, copes with changes and challenges, and achieves the digital transition to sustainable business models. In terms of journalism, it is clearly gaining better access to sources and competent journalists with important signatures while being recognised for its social contribution and participation in the forces of social development and democracy.

In the business model, it goes without saying that certified media with credible journalism stands out from those media that distribute, sometimes with unethical use of technology, malicious or sensationalised content for citizens, consumers of goods and services, society, and democracy. The next part provides a brief description of the key elements of the "ethos" project, which is the proposal for the study on ethical media governance. It also includes proposals for the establishment of ethical standards, methods for their monitoring, as well as proposals for optimal compliance with the requirements of a standard ethical and quality management system in the media.

Part Four

RECOMMENDATIONS

Through the analysis of existing conditions and proposed practices, a comprehensive set of self-regulatory recommendations can be formulated in response to social demands for accountability and to the EU Commission's proposal for voluntary self-regulation by the media industry. As a consequence, the entire media ecosystem, including major technology redistribution platforms, aggregators, and advertising businesses, is engaged in the self-regulation process. The recommendations set out have considered both the specificity of the industry and the vital needs of a world that is inadvertently changing faster, also due to rapid technological evolution. Hence, the proposal for an ethical and quality management system addresses the need to modernise the Code of Ethics with elements relating to new ethical dilemmas imposed by the internet and information and communication technologies; this can contribute to a paradigm shift of ethical governance bridging potential conflicts between regulators and policymakers and the regulated publishing organisations. The proposal concerns the integration of ethics into corporate governance by design, the independence of journalistic management to allow for self-regulation of responsible journalism, the formulation of ethical frameworks in a way that identifies the need for review and continuous improvement, and the need for the designation of a Public Editor to embody the responsible governance of a medium.

ETHICS BY DESIGN

The main aim is to integrate ethics by design and by default in the new period of high-tech media. That is, the obligation of the medium to implement appropriate technical and organisational measures, as well as the necessary guarantees:

- Implement appropriate technical and organisational measures designed to apply and monitor the principles of journalistic ethics and to incorporate the necessary safeguards in the editorial process. The enhanced skills and knowledge of journalists, combined with appropriate measures and safeguards, are intended to serve the same purpose.
- To serve the public interest and meet the public's expectations of accurate information. This includes the methods, policies, codes and means used for the purpose of journalistic processing. This set is indivisible and must be constantly reviewed to ensure their suitability or their improvement. Their value must be demonstrated on the basis of their effectiveness.

- Technological tools, editorial policies and ethics, together with the training of editors, are adequate technical and organisational measures when they include provisions for journalistic confidentiality, protection of sources, secure preservation of information, easy processing, and continuous training of employees.

The basic principles of ethics by design could be:

1. Preventive measures

The preventive measures are the provisions of the Code of Conduct, but, in addition, they need to be complemented with similar provisions for threats and risks that violate the organisation's corporate policy. Taking into account the above, planning is a preventative process rather than just a remediation process. Therefore, ethical governance occurs from the stage of planning and before business activity. This principle also means that the medium is publicly committed to a high standard of journalism, to respecting stakeholders, in particular the audience, and to serving the public interest, being aware of its social role.

2. Ethics as the default setting

Journalistic ethics seeks to provide the highest quality information to the citizen. After all, the public has the expectation that provisions are made for accurate information and that ethics is built into the media system by definition. It is, therefore, important to proclaim the principles, values and preventive and restrictive measures of the code of conduct observed by the media.

3. Ethics built into the design

Ethics is integrated into the design of content production and the architecture of text, audio and video processing systems. This ensures functionality and editorial independence. Published corporate policies document the integration, especially those relating to risks such as misinformation, and the preventive measures taken against all threats to the credibility of the medium.

4. Full functionality

Ethics by design seeks to satisfy all legitimate interests without unnecessary compromise, discrimination and separation. The incorporation of ethical standards should be done in a way that does not limit functionality and improves operation. This should also be documented by metric systems and methods.

5. Full ethical governance of information

Ethics by design, having been embedded in the organisation governance, every structure and department of an organisation or the system prior to journalistic editing, but also in the production within the newsroom, covers the whole of the media from one end to the other. Privacy, source protection and information

security standards applied must ensure the confidentiality, integrity and availability of information.

6. Transparent operation and accountability

Ethical governance, by design, seeks to satisfy all stakeholders, regardless of the business practice or technology involved, as it operates in accordance with mission statements and stated objectives. Responsibility and accountability to society mean that all policies and procedures are documented. Openness and transparency are key to accountability. Complaints, grievance and appeal mechanisms must be put in place and information provided to the public.

7. Respect for the public/s

The interests of the public/s come first. The media provide timely and accurate information to meet public expectations and, in general, the public interest. The Organisation's ethical journalism is demonstrated by its respect for society, citizens, and democratic institutions, the accuracy of the information, the provision of evidence to substantiate publications, the publication of the "other" opinion or challenges to the accuracy and completeness of information, and respect for complaint issues.

Ethical governance media by default

An important aspect of ethical journalism and the governance of Media Industry Organisations, in general, is the restrictive measures provided for in corporate policies and codes of conduct, as well as technical and organisational remedial measures. This means that journalistic editing processes are ethically oriented by default.

WHAT IS EGMS "ETHOS" ANALYSIS - APPLICATION REQUIREMENTS

"Ethos" claims to be described by the competent institutions as an integrated media ethics and quality management system (hereinafter EGMS, QMS), prescribing the general requirements for competence, quality, impartiality, confidentiality and consistent operation of the information media in the public interest. The system can be applicable to all and any organisations carrying out journalistic activities, irrespective of the number of staff and the type of content distribution. Supervisory bodies, regulatory authorities, assessment bodies and schemes, accreditation bodies and others may apply this QMS to confirm or recognise the ability of media

to meet the requirements of validity, quality, impartiality, confidentiality, ethics and consistent operation in the public interest. This standard is universal as regards the requirement of the ethical dimension of Quality in the Media. The standard references refer to the following frameworks in such a way that some or all of their content shapes the requirements of this document: 1) ISO 9000:2015 Quality Management Systems, 2) Editorial Codes and Code of Ethics for Journalists, 2) ISO 45001:2016, 3) ISO 27001:2013, 4) ISO 22301:2019, 5) ISO 31000:2018.

Approach to "ethos"

Current situation

Unregulated Industry in digital media, unclear common purpose, lack of objective criteria for the distribution of state advertising, interference by stakeholders, absence of self-commitment and mechanisms for audience satisfaction, control of powerful propaganda mechanisms, protection of public interest and support for the democratic ideal, phenomena of undocumented news with low-quality content, misinformation, absence of correction and accountability mechanisms.

Need

Recovering the ethical advantage of credibility, corporate and journalistic transparency by distinguishing the self-regulatory frameworks of corporate and journalistic management, independence and delineation of stakeholder relations, recognition of physical and technological risks, avoiding concentration and domination, protecting intellectual property rights, countering pressures from powerful interests, strengthening investigative journalism and protecting press people, and respecting legality and protecting rights.

Solution proposal

A voluntary framework of ethical self-regulation, which in a spirit of legal certainty, takes into account but also expands with soft law self-driven commitments to the corporate living space from restrictive regulatory rules and legislation, commonly accepted by the Media Industry with a key feature of a distinct compliance process in corporate governance and independence of the newsroom, which will leverage technological evolution and turn a threat into an opportunity.

The self-regulatory framework

Adoption of a framework that is auditable and certifiable by independent accredited bodies and based on internationally recognised Standards, the basic

principles of journalism and the proper integration and management of the technological factor. It requires specific training of expert journalism integration consultants, as well as training of certification inspectors based on the EGMS “ethos” framework.

Advantages

Internal organisation and standardisation, based on the most modern requirements that take into account the technological factor, internal control and certification for the good external evidence of compliance with the principles such as freedom of expression and protection of the public interest. It is easily integrated into cases of ISO-certified organisations, confirms in an objective process the independence of journalistic from corporate governance and applies to media regardless of the scale or type of distribution of their content. It gives the organisation a significant advantage in business development, audience engagement and improved advertising revenue.

The Operating Framework

It is based on internationally accepted Quality Management principles of the International Organisation for Standardisation (ISO), as well as on fundamental Ethical Principles through documented Policies and Procedures of the respective Media organisation, as well as on the legislative framework of the single digital market of the EU. It is integrated with a view to making the ethical dimension of the public mission of the medium a universal common purpose, linking quality journalism with vital business activity and ensuring that it is citizen-oriented and in the public interest.

Checkpoints of the ‘Ethos’ Standard

The proposed Model Management System examines the implementation aspects of the news service offered in terms of:

- The audience and public, in terms of news objectivity, trustworthiness and reliability
- The procedures for ethical, transparent corporate governance while ensuring the protection of sources, verification, completeness and validity.
- Technology, in terms of its use by human resources, mitigating challenges, ensuring confidentiality and maintaining integrity.
- The environment in which journalistic activity can be carried out freely, independently and impartially.

Through the Checkpoints, the required elements of good governance with a public mission of satisfying the citizen's need for accurate information, public interest and democracy, support for the independent newsroom, quality of content, validity, journalistic confidentiality, preservation of the historicity of publications, as well as the physical and digital security of correspondents and news commentators can be documented with objective criteria.

The Management System Audit Points examine and require for their Certification objective documentation for at least:

Sampled Control Points of the Management System:

- Identifying the operational framework of the Media organisation.
- The elements of ownership, concentration, autonomy and relationships with external stakeholders.
- Management's commitment to the principles of the Standard and the ethical principles of the media and journalism.
- The analysis of potential risks to independent and objective journalism and the technological infrastructure, as well as the precautions to be taken to address them in the digital environment.
- Clear planning of the provision of quality journalistic services.
- The willingness to allocate resources and define roles to carry out the work of the organisation and implement the ethics and quality management system.
- The requirement for adequate qualifications of the staff involved and their continuous training.
- Keeping documentary records (documented information).
- The design, development, testing and final release of publications.
- Maintaining the confidentiality of sources and unreleased information, the integrity and autonomy of editorial procedures and record keeping.
- Controlling the processes of production, commentary and publication policy.
- Internal control of compliance with the Media organisation's policies and procedures.
- The continuous qualitative improvement of the news services provided.

Table 10. *Indicative checkpoints of the EGMS "ethos"*

According to the EGMS "ethos", the Organisation should identify the following requirements as part of the standard ethical and quality management system:

EGMS «ethos»: sampled requirements

1. How the external and internal environment may affect its operation and the ability to achieve the intended results of the QMS.
2. What are the needs and expectations of stakeholders.
3. The ethical requirements and other requirements for the implementation of the Quality Management System.
4. Leadership should have the resources to help achieve the common purpose.
5. The definition of the Ethics Policy and Quality Policy to indicate the minimum mandatory requirements in the formulation/adoption of the Quality and Ethics Policy. Specific references to issues such as Independence-Financial Independence, Transparency-Logic, Ethics, Ethics, Mission of the Media, Public Satisfaction and Public Interest-Social Contribution should also be incorporated.
6. The Advertising Code should set out the commitments on the compatibility of advertising with content.
7. The Rating and Protection of Data Policy is to be based on the fundamental commitments of the Code of Conduct and the GDPR.
8. Activities to be implemented, planned, executed and managed impartially.
9. Confidentiality to be respected for the credibility of the medium.
10. It is required that the organisation has predefined roles in relation to the Standard. The Medium should have an Ethics Officer and Quality.
11. The Instrument shall establish, implement and maintain a process(es) for identifying threats and have a crisis management process in place.
12. The Instrument must have staff with the competence and resources required.
13. The Agency to document the methodology by which it ensures Health and Safety issues are addressed. Safety at Work. The Agency's facilities must meet certain minimum requirements.
14. The Agency should define the expertise, competence and technical capacity required of staff.
15. The Agency to ensure that records are maintained regarding the requirements of the Standard.
16. The Agency must design, implement and monitor processes to ensure that the information content and services are compliant.
17. The Instrument to ensure compliance with the Information Security Legal Framework. If Medium provides financial transactions over Public Networks (payments, subscriptions, etc.), apply security technologies.
18. Ensure compliance with requirements related to the protection of intellectual property.
19. Each Medium, as an entity at the centre of malicious actors (and malicious misinformation), has to have clear procedures for dealing with incidents.
20. If the medium employs investigative journalists who handle confidential and sensitive information, have a training programme and resources for secure communication.

21. Medium has technically tested its IT infrastructure (e.g. penetration and vulnerability tests).
22. The Agency shall establish a standardised process for the design and development of a New Content Programme and/or Service.
23. The Agency shall have a developed system for the evaluation of all external parties providing services or products related to the Agency's output.
24. The Agency has a policy of outsourcing programme production.
25. The Agency to establish, implement and maintain a process to control the procurement of goods and services to ensure their compliance with its management system.
26. Evidence of compliance with the defined acceptance criteria must be kept for the release of the content.
27. The Agency should have a reliable, objective system for measuring public satisfaction.
28. The Agency to carry out internal audits for its internal evaluation.
29. The review should include a report from the Ethics Committee and Quality Committee, a report on the public communication mechanism and a Public Value Report.
30. The Agency to strive for continuous improvement.

Table 11. *Indicative requirements of the EGMS "ethos"*

A basic provision of the "ethos" is to treat the journalistic administration as the only one responsible for protecting the independence of journalism and for autonomously defining the procedure it chooses both for monitoring the implementation of the Code and for the need to update it. Accordingly, it provides that one of the requirements of the EGMS is a report on the quality of content and ethics compliance by a specific journalistic role with the relevant duty.

WHAT IS AN ETHICAL STANDARD, AND HOW IS IT MONITORED?

In his message for the centenary of The Guardian Organisation, Scott (1921) mentioned the importance of not polluting the soul of the medium. What the Manchester Guardian editor left as a legacy is that the media and journalism should not be complacent and should keep it a priority to constantly investigate the truth. Their rules and skills should accompany every public assignment.

Much has changed in journalism since then, and although the industry and journalists like to refer to the timeless Codes of Ethics, they nevertheless face increasingly complex ethical dilemmas, mainly due to the involvement of technology in the routine of the profession. As is well known, Codes are not specific clauses in professional contracts but can be the main causes of undermining their

independence and authority.

Today, the main problem is that Codes of Conduct are not updated in line with the rapid technological development, although the internet and ICT applications are very much involved in information processing and content production, as the study by Diaz-Campo and Segado-Boj (2015) has shown. Noteworthy is Laitila's (1995) study, which identified revisions in 21 of the 30 European Codes she studied at a time when the world was changing with world-changing political developments, such as the fall of the Berlin Wall. Today, however, there is a large number of media, mostly digital and electronic, employing journalists without confirmed skills, but it is doubtful whether they have the required knowledge and awareness of ethical issues. In relation to the above, it is noteworthy that in Greece, digital publishers drafted a corporate Code of Ethics in 2016.

ETHICAL STANDARD

Ethical requirements by design and by default

The publishing organisation must strictly adhere to the relevant Code of Conduct for professional journalists. In addition, it lays down, after internal consultation, all the ethical rules on self-regulation, professional principles, working conditions and the public presence of staff. The above constitutes an Ethics Policy, and each article is a process. The assumptions and reasoning in each ethical rule are the starting points of this approach for any modern case of raising – and addressing- ethical issues, as the new conditions and technologies under which journalism is practiced today have been taken into account, as well as case studies that have led to the recovery of credibility, public satisfaction and avoidance of the ethical risks of the time.

Steps in setting up an Ethical Standard

1. Ethics Policy - Introduction

The media serve the public interest and the information, education and entertainment needs of the citizen. They shall adopt and fully implement the codes of conduct for journalists and the specific guidelines of the regulatory authorities. In the context of their Ethics and Quality Policy, promoting transparency and accountability as the key coordinates of their operation in the production and delivery of high-value content to the public, they adopt a full set of Corporate Codes of Conduct. In addition, they follow best practices, integrating them into a campaign of extroversion and innovation so that citizens receive high-quality information, entertainment and training services. The self-regulatory framework applies to all the activities of each organisation's media and all types of content

distribution (television, radio, web, and publications). Each Agency establishes roles and responsibilities (public editor, programme committee and ethics committee) to ensure that commitments are respected, independence, transparency and accountability. Each Agency shall train staff and establish procedures for identifying validity and avoiding false information and claims to counter misinformation.

2. Basic Principles - Code

This section includes the Code of Journalistic Ethics and the Corporate Editorial Code of a Medium. It should include at a minimum the set of professional principles under the Bordeaux Code, such as a) respect for the truth and the public's right to be informed of the truth; b) the obligation of journalists to uphold the principles of freedom in the honest collection and publication of information, as well as the right to fair comment and criticism, at all times; c) to report only on facts of which they know the source; d) not to withhold, misrepresent, falsify or fabricate information and documents, e) to use lawful means to obtain information; f) to do everything in their power to repair the damage caused by inaccurate news; g) to respect confidentiality at all times; i) to avoid discrimination on the grounds of race, gender, sexual orientation, language, religion, political opinion or another opinion, social or ethnic origin; j) to regard as serious professional misconduct slander, malicious presentation, copying, populism or unfounded accusations; k) not to accept bribes.

3. Mission Statement - Ownership - Independence and Financial Autonomy

The medium must proclaim:

- Mission Statement
- Ownership status
- Organisational chart
- Resources
- Company policies on terms of use, personal data, advertising, partners, copyright and the legal framework governing its operation
- Code of Conduct by design and by default with preventive, restrictive and corrective actions
- How it monitors the Code of Conduct it has accepted, and what are the consequences of deviation

4. Code of Conduct requirements

Ethical requirements should be made available in a manual with a detailed

description (rationale and recommended practices) for journalists and should address all dimensions of ethical issues (see ENED Code of Ethics)⁷⁷.

Checking compliance with the preventive and restrictive rules of the Code of Conduct

The check is carried out by the Public Editor - Quality Manager using the following methodology:

1. A monthly sample of articles is drawn from each thematic content category, in proportion to the criteria of interest set by the medium, in which an overview of compliance with journalistic ethical principles is carried out based on the following table. In the case of events of high importance and of great scale or duration of public interest, additional publications shall be sampled for analysis. For the analysis of cases of deviations, statistics from corrections, supervisory complaints and public complaints are collected. The total of 12 monthly reports make up the annual Ethics Report of the medium.

2. Internal evaluation

Section	Rationale	Requirement
DUTY TO THE PUBLIC	Validity and Accuracy of News	Declaration of respect for the duty of truthfulness. Validity Protection Policy process.
	Balance and impartiality	Declaration of impartiality and non-discrimination. Code of Conduct procedure.
	Balancing between privacy and freedom of expression	Training of editors for the public interest, public figures and private individuals. Weighting manual. The mechanism for preserving traces of proof weights. Data Protection Policy (GDPR).
	Children: Protecting children during coverage, filming and interviews	Civil Protection Procedure for Children.
	Interactive platforms	Which are available and how the user interacts. Corporate Interaction Policy process.
	Online Commentary	In which areas is the commentary open. Guidelines to staff. Terms for the public.
	Manufactured news and misleading headlines	A disclaimer of all reasonable tampering, fabrication and click-baiting. Confirmation Policy process of information.

77. Ethical Standard ENED Code of Conduct 2023 <http://www.ened.gr/i-enosi/kodikas-deodologias/>

RESOURCE MANAGEMENT	Confidential sources	Declaration of respect for sources. Source Protection Policy Process.
	Reliability and Performance	A political process to investigate the credibility of sources.
	Suppression of names and information	Procedure for the civil protection of anonymity.
	Interviews and how they are conducted	Interview policy process.
	Photos and videos - drones - Shooting practices and processing	Corporate policy process and guidelines for receiving and processing.
NEUTRALITY OF THE INSTRUMENT	Discrimination	Corporate policy process against discrimination on the basis of race, colour, religion, gender, political preference, health and sexual orientation.
	Censorship	Anti-censorship policy process.
	Speech Quotes	Procedure for the political management of speech extracts.
	Hostage situations	Political procedure for the management of hostage-taking cases.
	Terrorist - Bombing and other threats	Threat management policy process and cooperation with authorities.
PARTICIPATION IN THE PUBLIC SPHERE	Concealment of journalistic identity	Procedure for political concealment of identity - publication of the organisation chart – a mandatory signature of the author.
	Journalism and Politics	Process of political engagement of staff with political parties.
SENSITIVE MATERIAL AND EXTREME CONDITIONS	Smears, insults and slander	Process of political avoidance through the reporting of obscenity, slander and vulgarity.
	Sensual material and hard content	Process of political projection of scenes of violence and nudity.
	Aggressive speech and acts of violence	Process for managing hate speech and incitement to violence.
	Suicides	Suicide case reporting policy process.
COPYRIGHT - PLAGIARISM	Author's signature	Policy procedure for the liability of the author.
	Plagiarism - Use of material from other media	Plagiarism and churnalism disclaimer - References from other journalistic sources - Software available to prevent paraphrasing and plagiarism or content from automated AGI-type applications.
	Image - Sound - Editing	A statement of disclaimer of unauthorised use of material. Software to authenticate material.

CONFLICT OF INTERESTS	Accepting money from foundations and donations	Procedure for political acceptance of prizes and gifts.
	Economic interests of workers	Conflict of interest policy process.
RULES ON SOCIAL NETWORKING MEDIA	Social Networks and News	Procedure and verification guidelines for the use of content from UGC - SoMe/Material Licensing Policy.
	User-Generated Content (UGC)	Citizen Journalism Process and Policy. Disclaimer and marking of publications.
ERASURE OF DIGITAL DATA	Corrections to posts - File deletions	Corrections Procedure and Policy. File Deletion Policy Procedure.
COMMERCIAL POLICY	News and Advertising: where and how to draw the line	Procedure for a Policy to distinguish between informative and commercial content - Special labelling of foreign and promotional publications.
OBLIGATIONS OF MEDIA JOURNALISTS	Corporate Transparency and Accountability	Corporate Social Responsibility - Accountability Policy Process.
	Labour Relations	Procedure and Policy for a complete record of staff employed. Compliance with employment legislation - Cybersecurity and digital shelter.
	Personal Codes of Conduct	Policy process for Personal Codes of Conduct. Conscience clause for a journalist to refuse to sign off on a story he or she does not agree with.
	Freelancers and Fixers	Political cooperation process with external and independent editors.
	Appearances in other media	Corporate policy procedure for journalists' appearances in other media.
DATA JOURNALISM AND INTERACTIVITY	Data and graphs - Algorithmic journalism	Data journalism production process. Instructions for qualified newsroom staff. Guidelines for content production through AI/immersive journalism systems.

Table 12. *Internal assessment of ethical compliance*

INSPECTING ONLINE FOR COMPLIANCE

Successful public engagement, the openness of the medium and technology can, without requiring additional resources, be systematised, helping the Agency to measure also in this way the satisfaction of the public and to identify breaches of the code or the degree of sensitivity of users to issues and aspects of the news. An

easy and simple solution is the use of widely used management applications that, when integrated into a standard corporate process, provide valuable information in a timeframe ranging from the first minutes of publication to the entire life cycle of the published information. The standardised process is simple. The Public Editor or Ethics Officer should be able to communicate directly with the public on ethical and moral issues and also to explain the corporate journalism policy. Such a call to action (or correction button) feature below each publication may, for example, be based on an application that resembles a ticketing form. The interested user is redirected to the application and, after indicating contact information, selecting the ethics field and the subject field (knowledge base embedded in the application's interface informs about the ethical rules and self-commitments of the medium), asks a question, complains about a correction, or makes a complaint. In addition, the user has the possibility to document the request by describing it in a special field or uploading a relevant file, or contributing to a publication with additional information. This application informs the Public Editor in real time about each new claim. The representative immediately receives a notification to look into the issue, take the initiative, investigate and respond to the user in a reasonable time. The application with real-time data can be used as critical information by media management and can also be used as a direct way to check compliance with the ethics of the medium. Based on the above, the following real-time data analytics can be derived, such as:

- Requests to correct publications.
- Allegations of violation of the Corporate Code of Conduct.
- Importance of complaints by category of infringement.
- Contributions to sources, topics to be covered and media assets.
- Questions of clarification or need for additional information.
- Topics of particular interest to the public.
- Degree and timing of the representative's reaction to requests received.
- Validity of complaints.
- Frequency of violations in each category of the Code of Conduct.
- Public satisfaction.

The possibilities of a relevant algorithmic architecture include the following:

- Whistleblowing function.
- Training and evaluation of editors on identified needs.
- Public credibility campaign.

The Public Editor control panel includes the ability to delegate the resolution-response to another agent, to mark the issue as serious, valid or wrong in terms of subject matter, and unfounded as a claim. It also gives them the possibility to interact with the user for more information and, in general, to derive public opinion and a degree of satisfaction with the resolution of the claim. The Journalistic Management has the possibility to monitor from the BI of the application the most important statistics on the compliance with the Ethics Policy and to be informed in real-time about the public reaction and the response of the management mechanism, as shown in the table:

Agent	entry time	submission pending	Substantiated claim	Investigation time	Resolved
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Table 13. *Public Editor's response to an online application for monitoring ethics compliance and communication with the public*

MANAGEMENT'S COMMITMENT

Allocation of resources

A key issue in the implementation of the EGMS Standard is the willingness of Management to clearly commit that editorial independence and ethical compliance is a responsibility as important as doing business. This declaration cannot be given substance if the governance of the medium is disproportionately affected by the conflicting interests of external stakeholders, as is often the case in reporting related to disclosures about financial and political interests or affecting the relationship with advertisers. In contrast, both shareholders and stakeholders within the organisation and other stakeholders should take for granted the compatibility of self-regulation on the basis of ethical journalism. The declaration of principles should stipulate that journalism is a profession that, by its very nature, is called upon to serve principles and values for the benefit of society and citizens. It should recognise that its representatives, journalists, in order to be able to express ethically and legally defensible judgments, must be well trained, well informed and, above all, that they can operate freely in conditions that encourage them to act ethically. Looking at ethics from the perspective of the publishing business, the declaration should include recognition that their role is not limited solely to reproducing facts but that they also convey political, social, moral, cultural and other ideas. They, therefore, make an important contribution to shaping public opinion. The need

for more informed, skilled and well-trained journalists should be recognised in the context of the principles of the Management Declaration as a far more important investment than robotics and the automated processing of information 'presented' as capable of replacing the journalistic profession, disregarding ethical rules.

It should be stated that modern technology is not a method for journalism to deviate from ethical norms but a tool that contributes significantly to increasing the journalist's ability to collect, process and publish his/her information. In addition, that technology gives more opportunities to address threats and risks and illuminates the internal workings of the medium and the requirements of transparency and accountability, making outward-looking an advantage in competition. Under these circumstances, it is necessary to outline, already from the declaration of management's will to self-regulate based on an ethical standard, the resources, roles and responsibilities for the implementation of the Ethics and Quality Management System. The resources relate to the means to be used to develop the QMS and to integrate it as a process of common purpose and also to assist an independent editorial room that operates unaffected by impediments, work tools and funding sources.

Based on the above, the minimum possible resources are:

- Funding to meet the requirements of EGMS.
- Explicit guarantee for the independence of the editorial room.
- Technical infrastructure and facilities.
- Investing in cutting-edge technology.
- Subscriber information services - Sources - Agencies.
- Financial resources for ongoing training, rewards and development.
- Means of support, movement, and performance.
- Consumables and personal devices.
- Tools for transparency, accountability and interaction with the public.
- Personal protection measures.
- Legal and insurance cover.

Roles, Competences and Responsibilities

It is required that the Organisation has predefined roles in relation to the Standard. In this way, each employee knows his/her responsibilities. The Medium's management must ensure that the various security roles and responsibilities are assigned and communicated so that each employee handling sensitive data can confirm that he or she is aware of the risks and that he or she strictly adheres to the instructions. This obligation applies both to information and infrastructure and to

the correct use of devices and applications. Each Medium should have a QUALITY MANAGER who heads the Quality Committee of the Medium. A Quality Manager in the Media Industry may also be the Public Editor. He or she must be a journalist of standing, credibility and appropriate expertise, recognised by the public and his or her colleagues. The management must ensure his independence and the right to maintain expertise, which means that he has his own budget for matters relating to the performance of his duties. The Ethics and Quality Officer (Public Editor) reports directly to the top management and is responsible for drafting both the Instructions to staff and the Annual Report (Report on Compliance with Ethical Standards) at the beginning of each new year. The Manager shall collect data from the Heads of the Program, Procurement-Advertising, Complaints, Corrections, Production Control, and Data Protection (DPO) Departments on issues related to the requirements of the QMS. The Facility should designate supervisors for each unit and entity within the Organisation that has clear and defined duties that affect the achievement of the intended results of the QMS.

The role of the public editor

An important issue that a Medium must take care of is the allocation of resources and the training of newsroom staff to deal with misinformation. In this regard, every newsroom should have a human-centric technological tool to identify misinformation, misreporting and propaganda. Malicious content is circulated in real-time and rapidly, and for this reason, special information systems are required that give the advantage of control after a first critical, automated analysis process based on natural language technology and image metadata control. Journalists having at their disposal the first processing of natural language algorithms can define their own assumptions and their own authoritative media for subsequent verification and fact-checking processes. At the same time, the media face a serious problem of distributing their content without permission, resulting in lost revenue from the copyright of the content.

With this in mind, it is useful to raise the question of establishing an internal entity for ethics, quality of content and management of the public satisfaction and complaints policy again. This role could well be played by the Public Editor.

The role of the Public Editor⁷⁸ has been, from the outset, to evaluate the news

78. Ethics advice, communication with the public, monitoring for misinformation and intellectual property infringement (where applicable, he/she is also responsible for monitoring content quality).

coverage of a media organisation to ensure journalistic integrity and fair reporting. As an ethicist, they are a representative of the readers; they always aim to bridge the gap between an editorial room and the public, as is mentioned in an article by the Public Editors of Yale News (2020)⁷⁹.

Kathy English (2020), Public Editor of the Toronto Star newspaper from 2007 to 2020, has the same approach to the importance of the role. As she states, the role of the public editor is critical to credible journalism. She argues that this accountability should include the responsibility and power to hold news organisations accountable for diversity, inclusion and equity journalism that represents the interests of the general public. This requires, according to English (2020), a strong, independent role⁸⁰ that is responsive to the public, with a proactive oversight mandate and some measure of executive power to investigate, identify and highlight systemic issues that bring journalism short of its professional standards and public responsibilities.

In this HandBook, we argue that the role of the Public Editor needs to be expanded to enable them to act as an independent ethical governance advisor to the medium to monitor compliance with the Ethics and Quality Management Systems, to advise corporate and journalistic management, to support the editorial room's needs for advice and awareness raising, and to have the resources to manage communication with the public. Contemporary issues relating to corporate responsibility, the ethical nature of the business model, independence and avoiding conflicts with interests external to the organisations, as well as the challenges of misinformation, plagiarism and unethical use of technology, are areas where an entity such as the Public Editor could contribute. Although the contrary view leads to the abolition of the role, mainly due to the stormy form that public interaction with the newsroom has taken, nevertheless, impersonal representation of the medium vis-à-vis the public, or the dispersal of responsibility to editors or even worse to legal services, further distances journalism and the media from civil society.

However, it is important to note that in the US and the EU, there are now very few cases of media organisations that have appointed a Public Editor. The ethical approach potentially produces conflicts when shareholders and stakeholders attempt to interfere with journalistic activity and the ethicist disagrees. This may explain the questioning of the role. Something similar happens in large technology

79. THE YALE DAILY NEWS PUBLIC EDITORS: Introducing the News' public editors <https://yaledailynews.com/blog/2020/11/12/public-editors-introducing-the-news-public-editors/>

80. English K.(2020) <https://www.slideshare.net/ReutersInstitute/reckoning-for-relevance-journalist-fellowship-paper-by-kathy-english-24614027>

platforms that fire ethicists even though they operate algorithms with a significant impact on users and distribute huge volumes of content rife with misinformation, bias and discrimination.

Utilisation of Intellectual Capital

The Media Agency may need to invest more in the Company's human resources and the intellectual capital that motivates its activities in order to carry out its mission to serve the public interest and satisfy its stakeholders, the public, employees and partners. This is something that is logically consistent with modernising and upgrading technological equipment. For the effort to be successful, intellectual capital, infrastructure and technological capabilities must be synchronised to achieve common goals. This synchronisation implies upgrading the human factor, improving the working environment and working, communication and cooperation relations. The Instrument can implement this policy by providing a precise job description and autonomous roles. Management may jointly set performance expectations with employees and allocate the resources, time and space to achieve their goals. The organisation needs to trust its employees and managers so that modernisation efforts are aligned with business quality objectives, employees build relationships of cooperation and satisfaction with their work, personal development and growth, work team composition is based on more trust and solidarity, and management is committed to supporting employees to improve by setting only realistic goals.

Management by objectives is a management model that aims to improve the performance of an organisation by translating organisational objectives into specific sub-objectives. The employee works towards achieving these goals and reports to their immediate supervisor on their progress. Employees are evaluated on a variety of criteria, but the quality of their work is the most important. Employees who rank highly, both in performance and potential, have the potential to move up the hierarchy quickly as they add value to the Company. Within the workplace, where roles and objectives are clear, everyone recognises everyone's performance, skills and areas for improvement. The goal is productivity in quality services from satisfied employees.

Staff appraisal and development policy

One of the most important parameters is the awareness of the staff, especially journalists, on the common purpose of achieving the intended results of the publishing organisation. Training - awareness-raising is based on a declared public system for the evaluation and promotion of managers and precedes any process of examining journalistic competence. Improving the competence and skills of the organisation's managers through training programmes leads to the first phase of human resources assessment. In the second phase of the evaluation, the managers participate in the process of evaluation on their effectiveness and efficiency in performing their duties, judged on the basis of a well-established evaluation system based on the rating of each of them by their first physical supervisor and the first physical supervisor of the first evaluator. It is important that the appraisal system should invite the appraisee to contribute with information on the working environment, the duties performed, the unit, the problems encountered and proposals for their solution, as well as their expectations for promotion or transfer. The evaluation method may follow the following steps:

- Compilation of a corporate employee development policy.
- Compilation of a training programme.
- Training on a) corporate policies, editorial guidelines, Code of Conduct, Rules of Conduct and Ethics and b) content creation and distribution techniques.
- Examination of employees after the training cycle for each field separately, e.g. with multiple choice questions.
- Interviewing employees about their satisfaction with the job and environment as part of the development programme.
- Evaluation of employees, based on the quality of their work, staggered by the hierarchy of their physical supervisors.

The goals of an employee evaluation and appraisal system are to improve productivity, for management to make decisions regarding promotion, and job changes, to determine what is required to perform a job and to work to improve employee performance and support employee loyalty, satisfaction and sense of fulfilment.

All these objectives can be better achieved if the employer makes an effort to establish the performance appraisal process as a dialogue in which the ultimate goal is the improvement of all parties. To establish and maintain this framework, employers must inform employees of their value, praise them for their

accomplishments, establish a history of fair and honest feedback, be consistent in their treatment of all employees, and solicit employees' own ideas about company processes and operations.

Policy for safety and protection of Journalists

1. The media should raise security issues on every occasion, forum, ethics committee and/or press council in which they participate.
2. Participate in any intermediate mechanism to coordinate and protect journalists and their other employees (especially women, minorities, freelancers and organised crime investigators).
3. Create digital shelter conditions and train staff on communications security measures.
4. Have personal protective measures for journalists in the field.
5. Develop the skills of staff through training.
6. Train employees on data protection and cybersecurity legislation.
7. Encourage workers to participate in fora in favour of press freedom and against hate speech.
8. Have the means to manage threats and attacks against their employees and provide legal support.
9. Take initiatives to inform and raise awareness in society about the safety and protection of journalists.

Data processing code

Code of Ethics for Data Processing

The Code of Conduct for Data Processing, in the context of the application of Article 40 of the General Regulation (EU) 2016/679, "on the protection of individuals with regard to the processing of personal data and on the free movement of such data", must be approved by the Boards of Directors of the Agencies. It should be an additional guarantee of transparency and protection of the personality of journalists, collaborators and the public. It should clearly set out the basic principles of transparency, consistency, responsibility and accountability that should govern the processing of personal data and help to strengthen legal certainty in the

relations between news organisations and the public. The Code should reinforce corporate protection policies through the Freedom of Expression and Privacy Rights Policy and the Intellectual Property Policy. The link between the Code of Conduct and the corporate policies is also reinforced by the provisions in the contractual obligations of the Media and the employment and cooperation contracts. In general, it should also include any additional contractual obligations of news organisations. These contractual obligations ensure a higher level of protection for the recipients of information from the organisations themselves than this Code. If gaps in regulation are identified with regard to personal data, it is specified that these will be covered by the provisions of the Data Protection Code, even if the contract does not contain an explicit reference to it. With regard to journalists and media workers, the Code shall be complementary to any Employee Code, as well as to any more specific provisions governing the operation and status of staff of other public or private bodies.

What the Code answers

The Code answers how data is created or collected, how it is stored and retained, and how and with whom it is shared. It answers how information systems are involved in the processing.

Legal Requirements

According to Article 5 of the GDPR 679/2016, for the processing of personal data (both simple and special categories) to be lawful, the processing must be governed by the processing principles. Also, processing is lawful only if and when at least one of the following conditions applies:

- the data subject has consented to the processing of his or her personal data for one or more specific purposes,
- processing is necessary for the performance of a contract to which the data subject is a party or in order to take measures at the request of the data subject prior to the conclusion of a contract,
- the processing is necessary for compliance with a legal obligation of the controller,
- processing is necessary to safeguard the vital interests of the data subject or another natural person,
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party unless those interests are overridden by the

interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, in particular where the data subject is a child.

The data subject behind the information

The medium must declare through the Code that it

“Respects the privacy of the individual who provides personal information and processes it with an awareness of the consequences, ensuring that data is protected from hidden traps, interference, and bias. That it has a clear plan for data management. Subjects are never deceived. That the purposes of processing and the intentions of the medium are clearly presented, and free consent is sought. The change of purpose of processing must always be disclosed. The Medium must operate in a transparent manner, deserving trust. Follow audit and inspection procedures to ensure the validity and quality of the data and the framework for its collection and retention, protecting it from manipulation. Conduct continuous ethical and risk minimisation checks throughout the data lifecycle. The Medium must refer to experts in any case of doubt regarding possible violations of laws or regulations. To use technology that allows to protect confidentiality and privacy. Proclaim the belief in the principle of minimisation and the principle of proportionality. The Medium must operate responsibly without leaving the Company’s decision-making process to automated decisions without human intervention. To follow all risk identification methods to address risk and data security. To protect information about the individual. To continuously seek information hiding personal data that is exposed to risk. Finally, processes must comply with the decisions of the Data Protection Authorities on the list of types of processing activities subject to the requirement to carry out an impact assessment”.

Conditions to facilitate the balancing of press freedom and privacy

It is useful for the Media to adopt a common Code of Conduct for the processing of personal data and focus on guidelines for balancing privacy and journalistic processing in the public interest. These guidelines should be made known to journalists in the newsroom so that they are provided as a procedure of the editorial organisation. For implementation, specific tasks and responsibility roles could be assigned, and relevant training materials could be made available to all journalists, including case law and case studies that serve as examples. In this way, journalists, when they operate outside the framework set by the medium in which they work and, therefore, determine the purpose and manner of processing themselves, risk being considered data controllers, with the consequence that the responsibility of accountability provided for by the GDPR of the E.U. 2016:679 and the relevant

legislation, falls on them. That is, in this case, journalists are personally responsible for the correct weighing in favour of the public interest if the media outlet has a code of conduct, corporate policies and procedures that define in a specific way the criteria for weighing with the rules for the protection of personal data of public and private persons. It should be noted that in the event of a breach by the journalist of the code of conduct, guidelines, etc., the media outlet is not exempted from liability if the journalist's text, report, etc., is published.

ANNEX



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4. Context of the Organisation

4.1. Understanding the Organisation and its context

The organisation shall determine internal and external issues that are relevant to its purposes and strategic direction and that affect its ability to achieve the intended results.

4.2. Understanding the needs and expectations of the interested parties

The purpose is to monitor and control the information provided to the interested parties, as well as the requirements and expectations of interested parties.

This determines Medium’s ability to consistently provide content programs and services that meet the requirements of the public and the applicable legal and regulatory requirements.

4.2.1. Definition of ethical requirements and other requirements for the implementation of the Management System

The Media Agency is required to specify the method by which it determines its ethical requirements. This tests the method it has developed to determine them.

4.2.2. Ethical requirements

A detailed description of the ethical issues faced by the Media Organisation, with specific guidelines for journalists

4.3. Scope

Definition of the activities for which the Media Agency is interested in implementing the Standard. The Agency should define the limits and applicability of the Management System to determine its Scope

5. Leadership

The Scope must be available as documented information.

During the definition of the Scope, the organisation shall:

- a) examines the internal and external issues related to its purpose that affect its capacity,
- b) takes into account the requirements 1, 2, and 3 of para. 4.2,
- c) takes into account planned or ongoing activities related to journalistic processing.

The Management System includes the activities, programs, and services within the audit or the enterprise that may affect the performance of the Organisation.

The Media Organisation establishes, implements, maintains, and continuously improves a Management System, including the required processes and their interactions, in accordance with the requirements of this standard.

5.1. Leadership and Management Commitment

The Management must be committed to allocating the resources, proclaiming the importance of achieving the objectives of the Management System, calling for the mobilisation of all, and talking to the workers.

5.2. Definition of Quality Policy – Ethics

Minimum mandatory requirements for the formulation/adoption of a Quality-Ethics Policy. The Medium should have drafted its own Ethics and Quality Policy, which, among other things, should incorporate specific Policies and Procedures on issues such as:

- Independence
- Financial independence
- Accountability
- Ethics (professional codes, rules of contact and behaviour, corporate policies)
- Public Mission
- Audience satisfaction
- Public interest
- Social contribution

5.2.1. Impartiality

Journalistic activities must be carried out, planned, executed, and managed impartially.

Management must be committed to impartiality.

The journalistic organisation must be responsible for the impartiality of journalistic activities and must not allow political, commercial, financial, or other pressures to undermine impartiality.

The Instrument should identify the risk to impartiality on an ongoing basis. This should include that risk arising from his activities or from his relationships or from the relationships of his staff. However, these relationships do not necessarily present a risk to impartiality.

Management must be publicly committed to impartiality in journalistic work.

5.2.2. Confidentiality

The Media must be binding on journalistic secrecy and on the management of all information received or generated in the performance of journalistic activities.

The Media must maintain journalistic secrecy.

All proprietary information shall be treated as confidential.

Staff, including any members of committees, contractors, staff of external bodies, or natural persons acting on behalf of the Medium, shall respect the confidentiality of all information received or generated in the course of the performance of the journalistic activity as required.

5.3. Roles, Duties, and Responsibilities

It is required that the Agency has predetermined roles in relation to the Standard. In this way, each employee knows his responsibilities.

The Media Management must ensure that the various roles and responsibilities are assigned and announced. Any employee who handles sensitive infrastructure data acknowledges that they are aware of the risks and shall strictly adhere to the guidelines.

The Management must appoint a Quality and Ethics Officer (or Public Editor).

The Quality and Ethics Officer must be a journalist with authority, credibility and appropriate expertise, recognised by the public and his colleagues.

He is responsible for drafting the Annual Report of Public Merit, Transparency and Accountability.

6. Planning

6.1. Risk Assessment

The Medium must establish, implement and maintain a process(s) for the detection of threats that is continuous and active

The threat detection process should take into account, but is not limited to:

- how work is organised, social factors (including workload, working hours, victimisation, harassment, and bullying), leadership and culture in the organisation,
- routine and unusual activities and situations (including hazards arising from infrastructure, materials and the physical environment, design of programs and services, journalistic research, development of infrastructures and systems, testing, production, assembly, manufacture, delivery of services, archiving and disposal of content, human factors; possible emergencies).

The Media Agency must establish, implement and maintain a process or processes to:

- a) assess the risks arising from the identified hazards while taking into account the effectiveness of existing controls,
- b) identify and assess the other risks associated with the establishment, implementation, operation and maintenance of the management system.

Risks and opportunities generate other risks and opportunities for the Organisation. The minimum acceptable risk is not about the validity and impartiality of the produced content.

6.2. Ethical and Quality Goals and planning to achieve them

The ethical objectives of the quality of the production of informational content programs shall be specified and maintained in writing.

Ethical quality objectives must:

- be in line with the ethics and quality policy
- be auditable and measurable
- take into account the applicable requirements
- be related to the compliance of content and information services and the enhancement of public satisfaction
- be sustained
- be reviewed when necessary
- documented and the means of documentation kept

6.3. Change Management

If changes need to be made to the Ethics and Quality Management System, these should be done in a systematic way

The Agency should take into account:

- the purpose of the change and any of its possible consequences.
- the availability of resources
- the delegation of responsibilities and responsibilities

7. Support - Process requirements

The Organisation must provide the necessary resources for the operation of the Ethics and Quality Management System.

7.1. Asset and infrastructure requirements

The Media must be a legal person or a designated department of a legal person responsible for its journalistic activities. It must identify the Management, which has the overall responsibility. The Media shall define and document the range of journalistic activities for which it complies with this Standard.

The Medium must:

a) define its operational and administrative structure, its position in any parent organisation and the relations between management, technical functions and support services.

b) define the roles, responsibilities and relationships of all staff who manage, carry out or verify tasks that affect the results of journalistic activities;

c) document its procedures to the extent necessary to ensure the consistent application of its journalistic activities and the validity of the results.

The Management must ensure that:

a) communication is made (stakeholders-employees) concerning the effectiveness of the Management System and the importance of meeting the demands of the public and other requirements,

b) the integrity of the Management System is maintained when changes to the Management System are planned and implemented.

The Media must demand compliance for that range of journalistic activities from which externally provided journalistic activities are excluded on an ongoing basis.

7.1.1. Human Resources

The Medium must have personnel who, irrespective of other responsibilities, shall have the competence and resources necessary to carry out its tasks.

In addition to those provided for in the current legislative framework, the Medium should have the minimum composition of staff in number and specialisations in order to ensure the adequacy of the Operation of the Instrument and to demonstrate that it has a structure consistent with the coverage of needs

and the variety of specialities. The Instrument should have an Employee's File for the entirety of its staff. For every employee, there should be a staff evaluation system, and the relevant evaluations will be carried out every year with the main aim of enhancing the knowledge, experience, skills, grading and salary development of the employees.

The Medium must have a procedure(s) and keep records of the following:

- a) the identification of professional competence requirements;
- b) the selection of staff;
- c) the training of staff;
- d) the supervision of staff;
- e) the authorisation of the staff; and
- f) the monitoring of the professional competence of the staff

7.1.1.1. Health and Safety

The Agency must record the methodology by which it ensures health and safety at work issues.

The Medium must prepare an occupational risk assessment study and cooperate with an occupational doctor when this is provided for by the applicable legislation.

It must ensure the personnel to whom it entrusts missions in conflict zones.

PPE (Personal Protective Measures) should be described in the same way as legal, financial, and administrative provisions for cases where journalistic activity is carried out in a field deemed dangerous

7.1.2. Facilities

The Agency's facilities must meet certain minimum conditions

The Agency must provide and maintain the environment required for the operation of its journalistic processes and for the achievement of the compliance of its information content, e.g. physical, social, psychological and environmental factors, such as ergonomics and cleanliness

7.1.2.1. Minimum infrastructure requirements

The Management of the organisation must provide and maintain the minimum necessary for its operation, infrastructure

Minimum requirements shall include examples of infrastructure buildings, equipment, and Software/ Hardware systems.

Note: Infrastructure means facilities, equipment, software applications, information sources and news agencies, licenses, etc.

7.1.3. Equipment

The Agency should define the equipment it uses and check it.

The Medium must have at its disposal all appropriate and appropriate technological or other means available to workers in order to carry out the tasks they undertake. Journalists must have at their disposal all appropriate means for journalistic research and information processing (offices, furniture, computers, software) as well as the technically sound ability to publish their reportage.

7.2. Required personnel qualifications

The Agency should define the expertise, competence and technical competence required of staff to operate and to achieve compliance with the information content and services.

The Agency must:

- determine the required competence of employees/persons performing journalistic or content production tasks that affect the quality of information content and/or services.
- ensure that these employees/persons are appropriate in terms of general education, practical training, or experience. Where foreseen, it will take steps to acquire the required technical capacity and ensure the effectiveness of the actions carried out. It should keep appropriately documented information as evidence of competence.

7.3. Staff training and awareness-raising

The Medium should maintain personnel training records on the activities of the Instrument.

The training programs should be consistent with the mission and character of the Medium, while all specialities (journalists, technicians, administrative staff) should optimise their skills and, at the same time, acquire new ones in fields suitable for the Medium.

7.3.1. Establishment of a Content Programs Committee – Editorial Directorate Responsibilities and Composition

The Medium must have a director of drafting for the briefing and a manager or a Content Program Committee with defined responsibilities and a defined composition of members.

NOTE: When the content concerns only an informational program, the role of the committee lies with the Editorial Directorate (Director and editors-in-chief).

7.4. Records

The Agency shall ensure that records of the requirements of the Standard are kept.

The Medium should implement and maintain a system of safe storage of the generated content programs, news and archived material so that they are not lost, altered or destroyed.

8. Operations

8.1. Business Planning and Control

The Agency must design, implement and control the processes in order to comply with the information content and services.

The following factors should be considered:

- the requirements for the validity of the content and the quality of the services
- the criteria for acceptance of content and services
- the resources needed to achieve compliance with content and services
- the audit according to the defined criteria
- evidence so that the control of the procedures is reliable and demonstrates the compliance of the content and services with the requirements.

The result of the design must be appropriate to the functions of the Agency.

8.2. Special Requirements.

8.2.1. Compliance with the Code of Conduct.

The Medium should strictly adhere to ethics, the guidelines of the articles of association and the code of contact and conduct, maintain documented information on deviations, revisions and corrective actions in the individual fields and criteria of control.

The Medium monitors the preventive measures and implements a system for monitoring deviations in the restrictive ethical measures of the Code.

8.2.2. Personal Data

The Medium must strictly adhere to the ethics, the guidelines of the editorial statutes and the code of contact and conduct to keep documented information about deviations, revisions and corrective actions in the fields. Individual audit criteria based on the ethics assessment matrix. Adoption of a Code of Conduct, editorial statute guidelines and a code of contact and conduct focusing on the fields that are policies that require corresponding procedures

8.2.3. Non-Disclaimer

In case Medium maintains a Forum for information exchange and publication through the opening of user accounts, then it should:

- Ensure control over publications in accordance with a published policy (e.g. moderation).
- Be able to identify the user in cases of publications following a prosecutor's order and delete personal information when the publication order is lifted.

8.2.4. Information Security

The Medium must maintain Compliance with the Legal Framework and the instructions of the Regulatory Authorities by:

- Ensuring compliance of website content in accordance with the obligations of the law.
- Ensuring copyright protection requirements (republishing rules, protection from content appropriation)

8.2.4.1. Cyber Security

The medium must develop a Policy on the proper use of devices and applications and apply the respective organisational and technical measures.

8.2.4.2. Information Security Incident Management

The Medium must develop, maintain, enforce, test and exercise an Information Security Incident Management Policy and Plan.

8.2.4.3. Cryptography and secure communications

If the media provides Financial Transactions over Public Networks (payments, subscriptions, etc.), security technologies such as standards and protocols of secure transactions, encryption methods, certification of trusted third parties, etc., should be applied.

If Medium employs investigative journalists handling classified and sensitive information, it must have a training program and communication software resources for secure transmission and retention of information.

8.2.4.4. Information Protection Countermeasures

The Medium must apply technical controls on the IT environment (e.g. penetration and/or vulnerability tests).

The Medium must compile and maintain a Risk Assessment Study for the

information assets and apply countermeasures (KTOM - Appropriate Technical and Organisational Measures) as mitigating actions to protect the data from accidental or fraudulent action of loss of availability or integrity (falsification).

8.2.4.5. Business Continuity

Business Continuity must ensure the integrity and availability of the information.

The Continuity of Information Security must be incorporated into the Business Continuity Planning of the Medium.

The Medium must exercise and test the Business Continuity Plans for suitability, applicability and effectiveness in a systematic and periodic manner.

8.3. Design and Development of Information Programs and Services

The Medium must establish a process of Design and Development of a new Content-Program and/or Service suitable to make the subsequent production or provision reliable and useful to the public. When determining the steps that an organisation must follow when designing and developing a New Content Program/Service, the following should be taken into account:

- the nature, duration and complexity of the activities for the Design and Development of a New Content Program / Service
- the requirements of the different stages in the newsroom
- methods of verifying and validating sources and initial information
- responsibilities and authorities
- the need for resources (own or external)
- the need for interaction between journalists and technicians involved in the Design and Development of a New Content Program/Service
- the need to involve the public, partners or other stakeholders in the development process
- the requirements for the subsequent production of content or the provision of services based on uniqueness in advantages for the public
- the level of validity check expected by citizens and stakeholders
- evidence required to document the satisfaction of the requirements.

8.4. Products and services provided by external parties

The Agency shall have a developed evaluation system for all external parties providing services or products related to the Agency's output.

8.4.1. Subcontracting Services Procurement Management System

The Medium must design and maintain a management process for Suppliers, Subcontractors and Advertisers in order to ensure the adequacy of the services produced and the level of Quality specified in the Ethics and Quality Policy of the Medium.

Based on the Code of Conduct for procurement (which should be respected by each supplier) and the Advertising Code (which is respected by advertising agencies and advertisers), the Medium managers confirm in special reports to the Management that the authors and agreements and especially the Codes of Conduct have been observed.

As regards the procurement of content (program) by external subcontracting, it is necessary to comply with the following:

- a) the Code of Conduct,
- b) the content strategy of the Instrument;
- c) relevance to the mission of the Instrument;
- d) maintaining responsibility towards the public;
- e) the public value resulting from the supply and the only elements substantiating that value. This report (USP - Public Value Test) is prepared by the Program Committee.

8.4.2. Outsourcing

The Medium must ensure by contractual clauses that the outsourced functions and processes are controlled. The Medium must ensure that outsourcing arrangements are in line with legal and regulatory requirements and with the achievement of the intended results of the Management System. The type and degree of control to be applied to these functions and processes will be defined as part of the Management System of the Medium.

8.4.3. Procurement Control of Subcontracting Services and Evaluation of Suppliers – Advertisers

The Medium should establish, implement and maintain a process to control the procurement of programs, products and services in order to ensure their compliance with its management system.

The Medium must coordinate procurement processes with its contractors in order to identify hazards and assess and control the risks arising from:

- a) the activities and functions of contractors affecting the Agency;
- b) the activities and functions of the Agency affecting the contractors' workers;

c) the activities and functions of contractors affecting other stakeholders in the workplace.

d) The Agency must ensure that the requirements of the management system are met by contractors and their employees.

8.5. Control of Output Program

The Medium must document the control of the service produced and confirm the compliance of the product/service with the requirements of the Quality Policy and the Code of Conduct. The Medium should have an internal control mechanism for the production line and its products.

Note: This mechanism (with the participation of the Public Editor: responsible for public satisfaction policy and complaints - responsible for codes of conduct) will operate both on a sample basis and on the basis of public interaction in order to introduce improvement observations in a timely manner. The duties of the audit are violations and violations of the Code of Conduct of the Organisation. For this reason, a monthly report should be drawn up with all disputed cases, which will be discussed with journalists. In order to enhance transparency and, therefore, public confidence, these cases should be brought to the attention of journalists in the pieces of training, but also to the public's attention by inviting them to express an opinion.

8.6. Release of Information Program and News Service – Broadcast

In order to release both the information program and content as well as the services, evidence of compliance with the defined acceptance criteria set by the journalistic management should be maintained. The release of programs and services to the public will not be performed until the compliance of the content has been verified by a journalistic manager in the role of the controller (editor-in-chief).

- Documented information will provide traceability to the person(s) who approve the release-transmission-publication.

8.7. Non-Compliant Product Control

Results, content programs and services that do not meet the requirements should be identified and controlled so that they are not inadvertently used or transmitted. Appropriate corrective action should be taken for non-compliant content programs and services detected after the products are transmitted or during the provision of the service. The Medium may address non-compliant programs and services in one or more of the following ways:

- correction
- isolating, detaining, returning or suspending transmission of the program or service
- informing the public
- obtaining a license to use intellectual property as is or continuing or re-transmitting
- acceptance by consent

Compliance will be re-verified after corrections. Documented information should be maintained, including:

- the description of the non-compliance
- a description of the follow-up actions;
- a description of the release (where applicable and where applicable)
- those responsible for follow-up actions;

8.7.1. Crisis and Problem Management System

The Medium must have a crisis management system/process in place to identify potential risks and how to deal with them.

The Medium shall establish, implement and maintain a process(es) necessary to prepare for and respond to potential emergencies, including:

- a) definition of planned emergency response, including first aid;
- b) providing training for the planned response;
- c) checking the exercise of the planned response capability periodically;
- d) an assessment of performance and, where necessary, a review of the planned response, including after testing and, in particular, after the occurrence of emergencies;
- e) communicating and providing relevant information to all workers about their duties and responsibilities;
- f) communicating relevant information to contractors, visitors, emergency response agencies, government authorities and, where appropriate, the local community;
- g) take into account the needs and capabilities of all relevant stakeholders and involve them, where appropriate, in the development of the planned response.

The Agency shall keep documented information on the processes and plans for responding to potential emergencies.

8.7.2. Crisis Management

The Medium shall develop a Crisis Management Policy. The Policy will require a crisis management process in place to identify potential risks and opportunities.

When designing the Management System, the Medium must consider the issues mentioned in the framework, the requirements relating to stakeholders and the Scope of the management system and identify the risks and opportunities necessary to be addressed in order to:

- a) ensure that the management system can achieve its intended results;
- b) prevent or reduce undesirable effects;
- c) continuous improvement is achieved.

When identifying the risks and opportunities for the Management System and the intended outcomes to be addressed, the Medium must take into account the following:

- Threats
- Risks
- Opportunities
- Legal Regulatory and other requirements

The Medium shall identify and assess the risks and opportunities related to the intended results of the management system related to organisational changes, its processes or the management system. In case of planned changes, permanent or temporary, this assessment will be carried out before the change is implemented.

The Agency shall maintain documented information on the following:

- risks and opportunities;
- the processes and actions required to identify and address risks and opportunities to the extent necessary to trust that they are being carried out as planned.

9. Performance Evaluation

9.1. Monitoring, Measurement, Analysis and Evaluation

The Agency shall determine the following:

- what should be monitored and measured
- methods of monitoring, measurement, analysis and evaluation (to ensure valid results)
- monitoring and measurement of execution time
- the time of analysis and evaluation

The quality performance and effectiveness of the Quality Management System shall be evaluated.

9.1.1. Audience satisfaction

The Medium must ensure that it has a reliable, objective system for measuring public satisfaction

9.1.2. Audience satisfaction measurement system

The Medium should design and maintain an Audience Satisfaction Measurement System. This also concerns qualitative metrics, in addition to measuring viewership, listening, readability or traffic. In addition, it is considered crucial that one internal and one external qualitative research be carried out annually. The internal one relates to implementation on the platform of the Medium, and the external to outsourcing to a third-party external audit entity. The results of all are available to the Public Editor - Quality Manager, who informs the Management and, in turn, all interested supervisors.

It is recommended to operate a single service of communication with the public with the opportunity and motivation to express an opinion (Call To Action) but also to contribute to the satisfaction of the content and services.

The Medium shall monitor the audience's perception of the degree to which their needs and expectations have been fulfilled. The Medium shall determine the methods for obtaining, monitoring and reviewing this information.

Examples of monitoring the audience perceptions can include public surveys, feedback on delivered services, meetings with customers, market-share analysis, complements, warranty claims and dealer reports.

9.1.3. Complaints

The Medium should design and maintain a Public Complaint Follow-up System regardless of whether it has appointed a Public Editor.

The Medium must appoint a Complaint Handling Officer, who will investigate the matter, ask the editorial department for a specific correction, and respond to the user's complaint.

The Complaint Handling Officer, if he has not been appointed as Public Editor, submits monthly reports and an annual report to the Medium manager of the MS, who has the executive responsibility for the integration of the findings in the report to the Management.

The Medium must have an evidence-based process in place to receive, evaluate and take decisions on complaints. The description of the complaint-handling process must be made available to any interested party upon request. Upon receipt of the complaint, the Medium must confirm whether the complaint relates to the journalistic activities for which it is responsible and, if so, must handle it as indicated by the procedure. The Medium is responsible for all decisions at all stages of the complaint-handling process.

The complaint-handling process shall include at least the following elements and methods:

- a) a description of the process for receiving, validating, investigating the complaint made and deciding what action should be taken in response to it;
- b) monitoring and recording of complaints, including actions to resolve them, and
- c) ensuring that all appropriate action is taken.

The Medium receiving the complaint is responsible for gathering and verifying all the information necessary to validate the complaint.

The Medium must confirm to the complainant the receipt of the complaint and must provide the complainant with the progress reports and the final result.

The results communicated to the complainant must be produced, reviewed and approved by a person who was not involved in the initial activities in question. These activities may also be carried out by external partners.

Whenever possible, the Medium must provide formal notice on the completion of the handling of the complaint to the complainant.

The operation of a communication service with the public is recommended. For corrections in electronic media, the correction button function is recommended. The two procedures can be integrated into an electronic ticketing application on the corporate website of Medium.

9.1.4. Security monitoring and metrics

The Medium should assess the performance and effectiveness of its security measures. The Medium shall define what is to be monitored and measured and the methods to be applied.

The Medium should react to any non-compliance with the security requirements, assess and correct the problem and take mitigating action to prevent its future recurrence.

The Medium should continuously improve the adequacy, applicability and effectiveness of its information security framework.

9.2. Internal Control

The Medium shall conduct internal audits at planned intervals to provide information on whether the management system:

- a) Conforms to:
 - 1) The organisation's own requirements for its management system;
 - 2) The requirements of this Standard
- b) Is effectively implemented and maintained.

To this purpose, the Medium shall:

- a) Plan, establish, implement and maintain an audit program(s), including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the important processes concerned, changes affecting the organisation, and the results of previous audits;
- b) Define the audit criteria and scope for each audit;
- c) Select auditors and conduct audits to ensure objectivity and impartiality of the audit process;
- d) Ensure that the results of the audits are reported to relevant management;
- e) Take appropriate correction and corrective actions without undue delay;
- f) Retain documented information as evidence of the implementation of the audit program and the audit results.

Auditors should have the necessary qualifications so that objectivity and impartiality can be guaranteed.

9.3. Management Review

The Medium will hold designated meetings, which should have specific topics and aim at its continuous improvement. At least once a year, a review should be carried out by the management under the responsibility of the head of the publishing organisation. The Quality Manager (the Public Editor when the role is assigned or the Ethics and Quality Assurance Committee) of the Medium will update the data collected quarterly.

The Medium shall monitor the statistical data on whether the program, publication, website and any other new content meet the objective of public satisfaction.

The Medium shall use the results as input data in the management review.

Top management shall review Medium's management system at planned intervals to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the organisation.

9.3.1. Input for Management Review

The management review shall be planned and carried out taking into consideration the following:

- a) The status of actions from previous management reviews;
- b) Report of the Ethics and Quality Assurance Committee (Quality Manager).
- c) Report on the mechanism of communication with the public and mediation (Public Editor).

d) Report of the independent body for the control and regulation of publishing organisations.

e) Public Value Report with contents:

- 1) Impartiality Report
- 2) Reference to the variety of the program
- 3) Report by an independent regulatory body
- 4) Facts about audience satisfaction and preferences
- 5) Facts about advertiser satisfaction
- 6) Evaluation reports from suppliers and partners
- 7) Information on the opinion of the staff
- 8) Report on innovation and creativity
- 9) Report on corporate social responsibility
- 10) Quality control panel

f) Changes in external and internal issues that are relevant to the management system;

g) Information on the performance and effectiveness of the management system, including trends in:

- 1) audience satisfaction and feedback from relevant interested parties;
- 2) The extent to which objectives have been met;
- 3) Process performance and conformity of products and services;
- 4) Nonconformities and corrective actions;
- 5) Monitoring and measurement results;
- 6) Audit results;
- 7) The performance of external providers;
- h) The adequacy of resources;
- i) The effectiveness of actions taken to address opportunities
- j) Opportunities for improvement.

9.3.2. Output of Management Review

The outputs of management review shall include decisions and actions related to:

- a) Revisions to the Quality and Ethics Policy.
- b) New objectives to improve quality.
- c) Report on the degree of quality to all involved with a revision of the risk scenarios.
- d) Economic and technical study for the next period.
- e) Opportunities for improvement

- f) Any need for changes to the quality management system;
- g) Resource needs.

The organisation shall retain documented information as evidence of the results of management reviews.

10. Improvement

10.1. General

The Medium shall determine and select opportunities for improvement and implement any necessary actions to meet audience requirements and enhance the satisfaction of the public.

Examples of improvement can include corrective actions, continual improvements, breakthrough changes, innovations, and re-organisation

These shall include:

- a) Improving products and services to meet requirements as well as to address future needs and expectations.
- b) Correcting, preventing, or reducing undersized effects.
- c) Improving the performance and effectiveness of the management system.

10.2. Non-Conformity and Corrective Actions

The Medium must have a procedure to be applied when any aspect of its journalistic activities or the results of such work does not comply with its own procedures or with the reasonable requirements of the public and stakeholders. The Corrective Action Policy should be clear, communicated and comprehended by all involved parties.

The procedure must ensure that:

- a) the responsibilities and responsibilities for the management of the non-compliant work are defined;
- b) the actions (including stopping or repeating work and withholding exposures, as appropriate) are based on the risk levels established by the Instrument;
- c) a materiality assessment of the non-compliant work is carried out, including an analysis of the impact on previous results;
- d) a decision is taken on the acceptance of the non-compliant work;
- e) where appropriate, the public or source is notified, and the operation is revoked, and
- f) the responsibility for authorising the resumption of work shall be determined.

The Medium must keep records of non-compliant operations and actions as specified above.

Where the evaluation indicates that the non-compliant work could occur again or that there is doubt about the compliance of the operations of the Medium with its own Management System, the Medium shall implement corrective actions.

When a nonconformity occurs, including any arising from complaints, the Medium shall:

a) React to the nonconformity and, as applicable:

- 1) Take action to control and correct it
- 2) Deal with the consequences

b) Evaluate the need for action to eliminate the cause(s) of the nonconformity, in order that it does not recur or occur elsewhere, by:

- 1) Reviewing and analysing the nonconformity
- 2) Determining the causes of the nonconformity
- 3) Determining if similar nonconformities exist or could potentially occur

c) Implement any action needed

d) Review the effectiveness of any corrective action taken

e) Update risks and opportunities determined during planning, if necessary

f) Make changes to the management system, if necessary.

Corrective actions shall be appropriate to the effects of the nonconformities encountered.

The Medium shall retain documented information as evidence of the following:

- a) The nature of the nonconformities and any subsequent actions taken
- b) The results of any corrective action.

10.3. Continuous Improvement

The Medium shall continually improve the suitability, adequacy and effectiveness of the management system.

The Medium shall consider the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that shall be addressed as part of continual improvement.

The Medium shall establish, implement and maintain a process for the evaluation of the following:

a) opportunities to improve the performance of the Management System, taking into account the planned changes in the Organisation, its policies, processes or activities and:

- i) opportunities for workers to adapt to work, work organisation and the working environment;
- ii) opportunities to eliminate hazards and reduce risks;
- b) other opportunities to improve the management system.

Guidelines with good practices on the generation of content should be designed, so as:

- The Legal Department addresses all aspects of the activities that the Medium may be exposed to.
- The Public Editor informs the journalistic management systematically about any identified issue.
- The Public Communications Officer records any notable information and reports monthly to the management.



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Endorsements

“The authors’ handbook contributes to the debate on media organizations’ principles-based standardisation. As it emphasizes the importance of ethics, quality content, and transparent governance in journalism, it responds to technological challenges such as the protection of journalistic work from exploitation, misinformation, and plagiarism.”

Machi Nikolara

Head of the executive board Xenophon Rights / Organisation for the protection of intellectual property rights of Journalists (xenophonrights.gr) Greece

This study is very important because it highlights the vital need for self-regulation and ethical standards for media organisations. It is through the establishment of these standards and procedures that journalists are protected, that independent and pluralistic information is provided and that the citizen is protected from any form of manipulation or misinformation. These factors can all contribute to the development of a successful media business model that serves the public interest and facilitates the proper functioning of democracy.

Dr. Sotirios Triantafyllou

President of Panhellenic Federation of Journalists Unions
Director of Communication of Hellenic Football Federation
Teaching Staff University of Patras

AMNA is the national news agency in Greece and the Media in which the integration of the ETHOS management system was adopted, in the context of the study of the University of Vienna. AMNA presented the advantages of this self-regulation model to the Balkan and European news agencies as well, in the context of all international associations and other bodies in which it participates as a member. The model supports

the value of ethical and quality governance in public and private Media as a capable and necessary condition for dealing with all contemporary challenges.

Aimilios Perdikaris

Chairman of the Board - General Manager, Athens Macedonian News Agency
Chairman of the Association of Balkan News Agencies-SE Europe (ABNA-SE)

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