

Similar media systems, different self-regulation

*A closer look at the Nordic media
accountability models*

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ABSTRACT

This chapter reviews existing media accountability systems in Denmark, Finland, Iceland, Norway, and Sweden, and probes how current self-regulatory practices fit the idea of a homogeneous Nordic media welfare state model. This conception implies that Nordic institutions – including users, companies, regulators, and the state – would react to the emerging changes in the digital environment along largely uniform lines. However, a closer look at the systems of self-regulation in the Nordic countries reveals differences between their respective ethical frameworks, which in turn affect how they face perceived challenges of globalisation, digitalisation, and marketisation. Despite several historical commonalities, the Nordic self-regulatory bodies do not necessarily demonstrate a common developmental pattern in the digital era. The implications uncovered in this appraisal thus offer insights into comparative research on media systems in general and the Nordic media welfare state in particular.

KEYWORDS: media ethics, media systems, media accountability, journalistic self-regulation, media welfare state

Romanova, R., & Bergman, M. (2024). Similar media systems, different self-regulation: A closer look at the Nordic media accountability models. In P. Jakobsson, J. Lindell, & F. Stiernstedt (Eds.), *The future of the Nordic media model: A digital media welfare state?* (pp. 53–70). Nordicom, University of Gothenburg. <https://doi.org/10.48335/9789188855893-2>

Introduction

Nordic media structures have often been characterised in terms that emphasise strong journalistic professionalism and an adherence to the principle of freedom of speech (Hallin & Mancini, 2004; Syvertsen et al., 2014). Editorial freedom has become one of the pillars of the media welfare state concept alongside universal services, cultural policy for the media, and consensus between public and private stakeholders. It is referred to as a characteristic feature of the five Nordic countries: Denmark, Finland, Iceland, Norway, and Sweden (Syvertsen et al., 2014). According to Syvertsen and colleagues (2014), a combination of negative and positive policies, support schemes for the press, and institutionalised self-regulation remain key aspects fostering good professional practice in the region and counteracting the forces of globalisation, marketisation, and fragmentation.

The first part of this book focuses on policy responses in relation to contemporary challenges in the digital media landscape. In this chapter, we initiate a debate on media policy by delving deeper into institutionalised journalistic self-regulation and its recent transformation. In this context, institutionalisation is understood as a range of measures set up to maintain good professional practice immune to editorial or state interference. These measures include various media accountability instruments operating in the region at the professional and organisational level. More aspects of media policy, such as support schemes, are addressed by Halvorsen and Bjerke (Chapter 6).

In many respects, the Nordic media accountability systems seem to meet the criteria of the media welfare state. First, there is a long tradition of establishing tribunal bodies dealing with complaints about the press. Second, Nordic countries tend to hit the top of international ratings related to media trust and press freedom. Thus, according to the *Reuters Institute Digital News Report* (2023), trust in news in the Nordic countries remains above international averages. Press freedom ratings (RFS, Freedom House) traditionally put the Nordics at the top of the list. In the *Worlds of Journalism* (2022) country reports (2012–2016), it has been noted that Nordic journalists exhibit a particularly strong adherence to professional codes: More than 96 per cent of journalists in Finland, Norway, and Sweden believe that a journalist should always follow codes of professional ethics, regardless of situation and context. Although the results from Denmark and Iceland indicate lower support for the codes, the country reports still ascribe a strong commitment to professional ethics to Danish and Icelandic journalists (Fengler et al., 2015).

According to Syvertsen and colleagues (2014), the development of the media welfare state in the digital age has been characterised by the continuity and adaptability of its institutions. However, we suggest that some key elements of the media system were overlooked in their analysis. In this chapter, we focus on the current state of the Nordic media accountability models and

probe similarities and differences in the developmental paths of journalistic self-regulation in Denmark, Finland, Iceland, Norway, and Sweden. We look into these specific aspects of the development of the media welfare state aiming to answer the following research questions:

- RQ1. Which patterns characterise the adaptation of Nordic self-regulatory systems in the face of global challenges such as globalisation, marketisation, and digitalisation?
- RQ2. How do these patterns contribute to or contradict the uniform notion of a media welfare state?

Research design and methods

With our research questions, we seek to identify specific patterns characterising the transformation of the Nordic media accountability institutions. However, within the confines of this chapter, we cannot provide an extensive analysis of the whole self-regulatory system. Therefore, our focus is limited to the professional level of journalistic self-regulation represented by press councils and ethical codes (Eberwein et al., 2018). This entails the following active media institutions in the Nordic countries: the Council for Mass Media [Julkisen Sanan Neuvosto] and Guidelines for Journalists in Finland; the Media Ombudsperson [Medieombudsman], the Media Ethics Committee [Mediernas Etiknämnd], and the Code of Ethics for Press, Radio and Television in Sweden; the Ethical Committee [Siðanefnd] and the Rules of Ethics in Journalism in Iceland; the Press Professional Committee [Pressens Faglige Utvalgs] and the Code of Ethics of the Norwegian Press in Norway; and the Press Council [Pressenævnet], the National Code of Conduct, and the Media Liability Act in Denmark. The data have been obtained from the councils' official publications, annual reports, complaint decisions, and ethical codes.

Our examination sets out from media accountability studies that describe and classify existing models and tools maintaining accountability and press freedom in Europe and beyond (Bertrand, 2000; Eberwein et al., 2011, 2018; Fengler et al., 2015). In the first part, we identify the latest theoretical implications of media accountability instruments and analyse their relevance for the Nordic media landscape. In the second part, we focus on four dimensions used by Syvertsen and colleagues (2014: 120) to demonstrate “the adaptability of policy principles and solutions in the face of new challenges” of the media welfare state model. Taking into consideration institutionalised self-regulation as a part of the media accountability system maintained by respective instruments, we discuss whether phenomena of public engagement and professionalisation, marketisation, convergence, and technological development have been addressed by Nordic self-regulators at the professional level. Each dimension is investigated in terms of its effect on the structural

and organisational elements of the bodies. A comparative perspective is used to outline the main differences and similarities in the changing structures of active self-regulatory institutions in the Nordic countries.

Theory and practice of media accountability in the digital age

Media accountability systems – self-regulatory practices aimed at making the press accountable to the public – was operationalised as a theory in the early 2000s when institutionalised norms were already in place in most European countries. As such, media accountability systems were addressed as involving combinations of training, evaluation, monitoring, and feedback in “any non-State means of making media responsible towards the public” (Bertrand, 2000: 108). These functions were executed by instruments meant to

improve the services of the media to the public; restore the prestige of media in the eyes of the population; diversely protect freedom of speech and press; obtain, for the profession, the autonomy that it needs to play its part in the expansion of democracy and the betterment of the fate of mankind. (Bertrand, 2000: 57)

At the beginning of the twenty-first century, researchers identified more than 30 different categories of media accountability instruments, including broadcast documents, individuals, groups, and processes. However, all of them referred to traditional media: press, radio, and broadcasting.

With the development of the media landscape, the concept of media accountability has evolved as well. Its scope has been expanded to “any informal institution, both offline and online, performed by both media professionals and media users, which intends to monitor, comment on and criticise journalism and seeks to expose and debate problems of journalism” (Eberwein et al., 2011: 20). Questions of digitalisation – of the impact of globalisation, technological development, and marketisation – have been brought into the debates about media accountability. Due to increased interest in online formats, researchers have emphasised the role of the public in online media monitoring and suggested a new model of audience-inclusive media accountability (Eberwein et al., 2011). At the same time, the emergence of new forms of digital media, multi-channel news outlets, and novel sharing platforms has highlighted the need to revise traditional self-regulatory systems. As a result, separate professional standards for different types of media have become more and more problematic, and it has been suggested that one-media press councils ought to be converted into multi-media ethics councils (Frost, 2007).

Indeed, media research has detected general patterns in the restructuring of press councils and the revising of ethical codes (Fielden, 2012; Harjuniemi, 2013, 2014). Country reports have documented a tendency to transform press

councils into media councils as well as to expand the press ombudsperson's role in the Nordic states (Brurås, 2016; Guðmundsson, 2015; Harjunemi, 2013, 2014; Lidberg, 2011). Additionally, most European media councils now process complaints regarding online reporting. Some national ethical codes contain guidelines about journalistic behaviour on the Internet.

Nonetheless, the transition has been challenging for a system that is typically slow to respond to innovations. Traditional self-regulatory instruments are being challenged by an immense technological growth, leading to a re-consideration of professional practices for the production, distribution, and consumption of news. Most European media councils are struggling with issues related to social media platforms, journalistic blogs, user-generated content, audience-inclusive media, and blurred outlines of journalistic identity. Therefore, even the strongest accountability systems do not currently provide journalists with sufficient professional standards. Thus, the needs of the professional community are not adequately reflected in the directives and codes of conduct put forward by editorial offices and professional self-regulatory bodies. Without such institutionalised ethical foundations, these bodies risk losing their legitimacy. The Nordics are no exception.

The media welfare state theory has emphasised that the Nordic media exhibit a strong adherence to universalism, implying an equal and broad access to information for all citizens as well as a versatile variety of communication channels available for the public (Syvertsen et al., 2014). Therefore, a profound media sector fostering democratic and cultural values and shaping the stature of media self-regulation in the Nordics is expected to stay one step ahead in an effective problem-solving process.

In the next part of this chapter, we examine how Nordic self-regulatory models have responded to current challenges based on their recent structural and organisational activities. Despite Nordic media operating in similar conditions, this closer look at their self-regulatory practices reveals certain distinctions in their models of media accountability.

Navigating the recent development of media accountability in the Nordic countries

National media accountability instruments have become a distinguished feature of Nordic media self-regulation. In the Nordics, the instruments have most effectively been developed and implemented by means of normative documents, ombudspersons, and press councils established by the media- and journalistic associations. This combination has been considered a successful model in safeguarding trust in journalism in Europe and beyond (Brurås, 2016; Fielden, 2012; Lidberg, 2011).

Sweden, Finland, and Norway were pioneers in establishing national press councils and promoting the idea of institutionalised self-regulation enshrined

in the guidelines and codes of conduct. The process of the institutionalisation of professional standards began in the 1910s in Sweden, and over the years, it has achieved significant public recognition in the whole Nordic region. Nowadays, each Nordic state has an operating press council that stipulates general principles of good journalism embodied in national codes of ethics or other normative documents.

Historically, the structural organisation of Nordic media accountability systems includes several types of self-regulation, combining voluntary independent self-regulation with co-regulation based on both statutory and self-regulatory elements. For instance, while other Nordic countries rely on the media council, the media ombudsperson handles most of its functions in Sweden. Moreover, Denmark exhibits a special case of media-state cooperation, where the state can revise the self-regulatory system if it finds it unrepresentative (Koene, 2009).

A closer look at internal procedures and the organisational management of these bodies provides more detailed insight into the different approaches to the methods of self-regulation adopted in the region. Based on challenges addressed by previous studies (Eberwein et al., 2018; Syvertsen et al., 2014), in what follows we examine Nordic professional media accountability instruments in light of four dimensions especially relevant for their recent development: public engagement and professionalisation, marketisation, convergence, and technological growth. These dimensions capture a transformation of current Nordic media accountability systems linked to global challenges.

Public engagement and professionalisation

Universal access to information has become one of the key aspects of the media welfare state: “The citizens should not only be informed, but able and motivated to take an active part in both political and cultural activities” (Syvertsen et al., 2014: 24). Recent surveys indicate that Denmark, Finland, Iceland, Norway, and Sweden have made significant progress in achieving this goal. In 2021–2022, these Nordic countries ranked among the top for both press and online news consumption as well as engagement with social media in the EU (Eurobarometer, 2022). Remarkably, among all Nordic and European countries, Iceland stands out as a leader in various digital activities.

However, the role of the public reaches beyond mere media consumption. It also encompasses participation in news production (e.g., in terms of user-generated content) and media monitoring. In the Nordic countries, this public role plays a vital role in national media accountability systems, particularly in press councils. Originally, the primary objective of press councils was to hold the media accountable to the public (Bertrand, 2000). Consequently, the composition of the Nordic councils reflects a balance between legislators, journalists, and the public that come together to resolve complaints against the media.

Notably, in Norwegian and Swedish media councils, nearly half of the members represent the public. Denmark and Finland follow closely, with substantial public representation at 33 and 28 per cent, respectively. In contrast, the Icelandic Ethical Committee consists solely of active or retired journalists in a small board of five members. The growing prominence of professional and public representatives in Nordic media councils reflects changes in the role of the councils. As the media landscape undergoes significant social and professional transformations, open discussions and debates on current threats are expected to arise within the councils, effectively amplifying professional and public debate (Eberwein et al., 2018).

Another trend is increasing professionalisation: Today, staff members and chairpersons tend to have more extensive journalistic backgrounds. Among the Nordic countries, Norway has the longest tradition of journalistic presidency, since 1972. In Finland, a professional journalist became the chairman of the Council for Mass Media in 2008. Additionally, a shift from a traditionally legislative background is notable in Sweden: After a long occupation by lawyers, a professional journalist was first appointed ombudsperson in 1992 and again in 2020. In the Icelandic model, all members have a journalistic background: Three members come from the Journalistic Union and two more from academia. At present, only in Denmark must the chairperson and vice-chairperson be law graduates: “in practice, the chairman is a member of the Supreme Court, and the vice-chairman is a solicitor” (Koene, 2009: 60).

The nature of the required professional background can be linked to the regulatory tasks and general social activity of the council. On the one hand, a legislative background is more important for a tribunal function aimed at addressing disputes between journalists and the audience. This explains the case of Denmark: Adjudicatory skills bring more value to the handling of complaint processes. On the other hand, a journalistic affiliation supports a focus on professional challenges. Both patterns of expanded public inclusion and the professionalisation of self-regulatory institutions accompany two essential principles of the media welfare state: first, the assurance that the audience is informed, protected, and takes an active part in political and cultural activities; and second, the ability of the media to regulate itself without state interference (Syvertsen et al., 2014).

Marketisation

The media market has sought to respond to global opportunities, striving to maintain competitiveness at the international scale. Traditional media has frequently appeared to be faced with a veritable thunderstorm of innovative communication services rapidly developing in the digital age. In order to maintain relevance for readers and viewers, the Nordic print press and broadcasters have demonstrated a prompt adaptation, expanding the production and distribution of media content to new levels (Syvertsen et al., 2014).

However, increased competitiveness can threaten key democratic principles of media freedom and accountability, which should ensure that profit motives do not prevail over the quality of journalistic content.

Attempting to address challenges of the changing media landscape, Nordic self-regulators have begun to re-evaluate some of their basic roles and functions. We have particularly noticed that recent activities within the Finnish and Swedish media councils demonstrate a small yet significant shift from a tribunal function to more explicitly social and professional objectives that accompany the complaint-handling procedures. Generally, such side functions refer to the protection of freedom of speech and publication as well as the interpretation of good journalistic practice. The “Basic agreement” of the Council for Mass Media in Finland decrees that the council should “cultivate responsible freedom in regard to mass media as well as provide support for good journalistic practice” (CMM, 2020). To achieve these objectives, some of the council’s representatives have developed distinctive public profiles; for example, the Council for Mass Media’s chair has a blog, revealing the council’s position on the most controversial cases and professional challenges. In addition, an active online presence facilitates the promotion of the Council for Mass Media to the public.

In Sweden, the media ombudsperson engages in educational initiatives and participates in public debates on media ethics. Furthermore, the media ombudsperson provides free advice to individuals who consider themselves disadvantaged by a publication. According to the 2020 annual report, within the preceding ten years, the media ombudsperson had been interviewed 457 times, held 320 lectures, participated in 90 debates and 40 podcasts, and written 85 chronicles and 28 debate articles. This shows that some media councils are expanding their functions from arbitration to a social agent role, fulfilling both professional and public needs.

In the digital environment, some Nordic self-regulatory bodies evidently feel compelled to perform more public-oriented functions, calling for public input in debates concerning key ethical issues. As the cases of Finland and Sweden demonstrate, this can also take the form of media literacy campaigns and educational events that aim to combat the spread of mis- and disinformation and fake news (Heikkilä & Välvirronen, 2019). However, based on official documents and other available data, Icelandic and Danish media councils do not follow this pattern. In these cases, the councils’ activities tend to be restricted to a tribunal function, leaving public debate to journalistic unions.

Convergence

Convergence is a major consequence of the digital transformation of the media industry. The concept refers to the digitalisation of journalistic processes along with the transformation of professional practices and strategies derived

from the emergence of digital media (Kackman et al., 2010). Specifically in the Nordic countries, convergence has facilitated a rapid expansion of the media, both vertically and horizontally, and has led to the expansion of media channels (Syvertsen et al., 2014). A prompt switch to the online environment has created new challenges for media accountability systems, which have been forced to adjust traditional practices to the digital era.

Media accountability studies have identified two processes of adaptation in media councils: the internal restructuring of press councils and the revision of the ethical codes (Eberwein et al., 2018, Fielden, 2012; Harjuniemi, 2013, 2014). In the Nordics, researchers have underlined a trend to transform press councils into media councils, as well as to expand the press ombudsperson's role in Sweden (Brurås, 2016; Guðmundsson, 2015; Harjuniemi, 2013, 2014; von Krogh, 2017; Lidberg, 2011). As a result, the coverage of Nordic press councils has grown from solely press to television and radio, and later to online media such as websites, Facebook pages, online blogs, and YouTube channels that publish journalistic content.

According to the Media Councils in the Digital Age project (2020), all five Nordic countries have confirmed that they deal with content published in different online formats. Denmark, Iceland, and Sweden specify that they consider digital channels only if they are defined as professional media channels by their ethical systems; however, there is no general agreement on what constitutes this. The same challenge persists for identifying a professional journalist on the web or determining which social media posts can be classified as journalistic content.

Corresponding amendments and precise definitions might potentially be included in the national codes; however, this process is complicated by two chief factors. First, it is technically problematic: Current codes have been established via a long-standing procedure that has targeted only traditional (in some cases, only printed) media. The case of Sweden shows that distinctions based on media type are not practical amid a general expansion of journalistic channels. Therefore, even with a focus on solely journalistic content, media councils express the need to distinguish between relevant varieties of journalistic work. The second reason follows: Concepts of agents, institutions, processes, and techniques involved in the journalistic process are too ambiguous. Without specific operationalisation, there is no certain way to define who and what ought to be added to the jurisdiction of media councils.

As a result, the ethical normative basis within the Nordic countries diverges, with variations in the frequency of code revisions. The ethical codes of Finland, Norway, and Sweden include the most recent adaptations: They have implemented guidelines related to digital media in 2014–2020. The Danish Media Liability Act has not been changed since its appearance in 1992, although the ethical rules were last reconsidered in 2013. At the time of the writing of this chapter, the Icelandic code has not been updated since 1991.

A report on the current digital challenges to ethical standards of journalism (Juntunen, 2022: 40) has emphasised a global need to revise the European codes: “the councils have to be adaptive to change and open to re-thinking their roles, procedures and principles to maintain their legitimacy in an ever-changing media landscape”. However, not all the countries support such changes, preferring to deal with more general and therefore flexible guidelines instead. The concise nature of the codes provides more space for interpretation and allows the councils to adjust to modern realities, relying on the trust from the professional community and public.

As an alternative to the codes, certain councils have published complementary guidelines in the form of additional statements. These statements are not parts of the main code, but they do provide more explicit information of good journalistic behaviour in a specific case. Some Nordic self-regulators suggest guidelines concerning digital publications derived from the convergence and expansion of media channels. The Norwegian code recommends informing the audience of interactive services in publications, ensuring a clear understanding of digital pre-editing for users, and moderating inserts that are not in compliance with the Norwegian ethical code. The 2011 Annex of the Finnish Guidelines for Journalists considers online-generated content. It demands the responsible editorial monitoring of websites, checks on privacy and human dignity violations, and a clear demarcation between public and editorial content. A small remark regarding online news exists in the Danish Ethical Rules: Sensitive or private information may be removed upon a request if deemed reasonable. Put differently, it is the only Nordic code that includes the right to be forgotten at the professional level of self-regulation. Alternatively, in its official statement, the Finnish media council has delegated this responsibility to editorial offices.

In total, the Finnish Council for Mass Media has published 21 additional statements regarding various topics – from surreptitious advertising to marking news automation. The same strategy is followed by the Norwegian Press Professional Committee, which provides the Editorial Poster – complementary rules regarding more explicit duties and responsibilities for editors. Nevertheless, the cases of Denmark and Iceland do not reflect a need for large updates. Considering their narrower tribunal function, we surmise that more general codes give these councils greater flexibility to interpret ethical guidelines based on the current professional climate.

New professional challenges emerging from the digital environment might potentially create new grounds for violations and change the nature of complaints. In this case, the update of the ethical codes would be motivated by new complaint requirements. However, most media councils have recently reported that incorrect or incomplete information has still been the most common violation. Currently, four Nordic media councils provide guidelines for factual accuracy and resolve complaints concerning factual errors. In the

case of Sweden, factual accuracy is not directly considered by the media ombudsperson, due to strict criteria for a complaint submission. In Sweden, the task is to investigate reports from individuals who feel personally damaged by the reported medium. Accordingly, an incorrect or incomplete factual statement may be considered only if it may have harmed a designated person. Therefore, updates concerning the format of the publication would not be necessary for the councils: Complaints regarding incorrect information would be dealt with in the same way regardless of the type of media. It correlates with the ideas that media councils should “keep the balance between keeping their core principles clear and stable to be applicable and acceptable and, at the same time, up-to-date, so they adequately reflect the prevailing reality” (Juntunen, 2022: 3).

Therefore, another method for lessening the workload is to delegate decisions to editorial offices. This practice put specific limits to the ethical framework addressed by the councils. With regard to the range of ethical violations, the scope differs significantly between the Nordic countries. For instance, the guidelines concerning journalistic behaviour are not a part of the media ombudsperson’s work in Sweden; rather, it is a task of the Swedish Journalistic Union. Additionally, if a publication does not personally affect the complainant, the complaint will be dismissed by most of the councils. Furthermore, in Finland, Iceland, and Norway, the complainant must indicate which part of the code has been violated.

Consequently, a complaint regarding the same matter could be accepted in one country but rejected in another. A focus on damages to individuals is not similarly curbed, but it potentially restricts legitimate complaints to cases of individual harm.

Technological development

The impact of digitalisation goes far beyond media convergence. In media studies, digitalisation as a social phenomenon has been analysed both in terms of technological innovation and social change (e.g., Castells, 1996, 1997, 1998; McLuhan, 2008). This ambivalence is also crucial for understanding the need for improvement: The reorganisation of media accountability instruments is not just a technical process; it leads to a multilevel transformation of professional culture. As another consequence of digitalisation, technological development leads to new professional practices that frame journalistic work. These practices also may determine the development of media accountability systems intended to ensure a responsible and accountable usage of digital technologies by journalists and media companies.

Technology is putting significant pressure on the concept of media accountability. This new reality raises pertinent questions concerning the reliability of journalistic information in the digital media age, the extent to

which algorithms influence journalism, and how emerging modes of social and automated communication reshape professional journalistic practices (Eberwein et al., 2018).

In recent years, media councils have highlighted the emergence of platformisation and augmented journalism (Lindén, 2017; Lindén et al., 2019) as focal points of discourse. Platformisation, which we touched upon in the previous section of this chapter, refers to the idea that regardless of the publication channel, journalists and news outlets bear responsibility for their content. Present policies by media councils demonstrate that they stay platform-neutral and cover all dissemination channels of journalistic content.

Clearly, in light of technological development, there are two primary approaches to enhancing the role of media accountability. The first approach, as pointed out by Eberwein and colleagues (2018), advocates innovative accountability instruments such as news websites, weblogs, and social media. The second approach entails the adaptation of already existing instruments to maintain their legitimacy within the digital age. From this angle, it is vital that media councils update their policies and complaint procedures.

In addition to pressures posed by new media platforms, media councils are being challenged by the growing influence of artificial intelligence (AI) on journalism. Although applications of AI in the media are still comparatively novel, many researchers have documented their profound impact on daily routines and even the philosophical foundations of the profession (Beckett, 2019; Diakopoulos, 2019; Lindén, 2017; Lindén et al., 2019; Sirén-Heikel et al., 2019).

The impact of AI has been visible within all stages of news production (Beckett, 2019). Vast datasets raise the question of their origin and uses: The audience must clearly understand “where information come from, how it is produced, and for what purpose” (Lindén, 2017: 71). Such issues often force media companies to improve openness and accountability to users in order to maintain public trust. As a result, the use of AI also affects principles of journalistic self-regulation.

Recent studies have reported that European journalistic self-regulators underestimate AI’s impact. Until 2020, there was no ethical code containing any directives about news automation, personalisation, or robotisation. Moreover, current complaint procedures are still not adjusted to the issues concerning AI (Haapanen, 2020b). Nonetheless, recent discussions indicate an increased interest among professional self-regulators to engage with AI-related matters in the near future.

The Finnish Council for Mass Media was the first professional body to put forward definitions of AI-based mechanisms in the media and to provide initial guidelines for their responsible usage. The initiative has been widely discussed at the EU level, and it has stimulated media councils to react and not leave the use of algorithms to state regulators or platform companies

(Haapanen, 2020a). Issued in 2019, the Finnish “Statement on marking news automation and personalization” (CMM, 2019) was the first decree in the world pertaining to the ethical implications related to the use of algorithms and AI issued by a national council. Although the statement did not provide a set of comprehensive regulations, it has been hailed as an important first step towards responsible use of AI in the context of journalism. In this respect, it constitutes one of the most tangible attempts to respond to new technological tools by a Nordic self-regulatory body so far. At the time of writing this chapter, no significant policy changes have been introduced by other Nordic countries.

Discussion

In the context of the media welfare state, which emphasises a high degree of editorial freedom and institutionalised self-regulation, media accountability stands as a cornerstone in the preservation and promotion of democratic values. In this chapter, we have examined how the Nordic media councils have addressed the challenges posed by global forces and adjusted traditional practices to the new environment. In this context, the role of media accountability systems has never been more pronounced, especially as journalism seeks to validate its societal role and survive in a rapidly changing media environment (Eberwein et al., 2018). Therefore, media accountability – “the lifeblood of independent democracies” (Eberwein et al., 2018: 8) – ought to play a key part in discussions of the media welfare state and its future.

In the preceding review, we have traced how the dimensions of public engagement and professionalisation, marketisation, convergence, and technological development have been addressed by the media councils of the Nordic countries. Our analysis has established that global challenges have not *yet* triggered radical transformations in the media accountability systems of the region. Accordingly, Nordic media accountability systems continue to be largely focused on their traditional – and arguably vital – role of safeguarding press freedom.

Still, it’s important to recognise that the Nordic models have had to adapt to the digital era. One trend indicates a shift from a traditional press-oriented council to a broader media council model. Still, this transition from “press” to “media” retains a strong journalistic orientation to news media. The national self-regulators we have examined tend to stay narrowly focused on journalistic work in accordance with the primary purpose of their operation. As a result, while Nordic media councils are becoming platform-neutral, covering all possible channels of news dissemination, their operations have so far remained exclusively journalistic in scope.

We have also registered some significant differences between the Nordic models. In broader terms, for each dimension examined above, the Nordic

countries have pursued distinct paths of development. The general trend toward expansion does not therefore imply a uniform Nordic approach to media accountability. While the Danish and Icelandic councils abide by their tribunal role and focus on complaint-handling tasks, the other countries are pursuing additional societal side functions, in particular striving to bring debate on media freedom to the public agenda. This tendency accords with the tradition of public representation in self-regulatory activities in Finland, Norway, and Sweden. Simultaneously, we can see a trend toward professionalisation, as several of the self-regulatory bodies now tend to elect chairpersons with journalistic backgrounds.

Convergence has sparked debates about general ethical codes. Some Nordic media councils (particularly the Finnish one) advocate comprehensive codes, aiming to leave no room for ambiguity. In contrast, other countries (especially Iceland) favour maintaining a higher degree of generality in their codes, allowing for greater flexibility in interpreting the guidelines.

While the process of convergence has led to an embrace of platform independence in the Nordic media councils, they remain cautious about expanding their reach to social media and are generally disinclined to include content that might not fit journalistic criteria. Moreover, some of the councils explicitly delegate decision-making authority to editorial offices, which purportedly have more knowledge and resources to deal with nuanced cases.

With regard to the near future, we can see two alternative scenarios. On the one hand, since a media council is typically understood as an agency for the evaluation of *what* has been published, not *how* it was published, the codes stay neutral regarding media platforms or new technologies, and alternative self-regulatory bodies might emerge to fill the gaps. On the other hand, the potential expansion of the media council may grow beyond professional journalism to social media and other forms of communication. However, current documents do not indicate that Nordic media councils even consider going beyond journalistic content.

In the literature, the effectiveness of media accountability systems is typically measured by their degree of institutionalisation. Thus, given that the Nordic states are leading in the number of institutionalised (and not institutionalised) media accountability instruments, they have been placed at the top of the first prototypic rating of media accountability in Europe (Eberwein et al., 2018). However, while a high number of instruments may demonstrate a commitment to accountability, it does not necessarily translate to tangible improvements in content quality, ethical standards, or audience trust. Our study has suggested that not all Nordic institutions demonstrate a similar willingness or ability to adjust to a rapidly changing media environment. In our view, institutionalisation tells only part of the story; and it may be an insufficient measure of “effective” self-regulation in the digital era. Accordingly, as editorial freedom remains one of the pillars of the media welfare state

concept, a more thorough qualitative evaluation of local media accountability instruments and practices may be needed. The self-regulatory models that we have examined exhibit significant differences as well as similarities – a fact that may call into question some of the purported underpinnings of the idea of a singular Nordic media welfare state.

Document analysis provides valuable insights into the current state of the Nordic media accountability models. Of course, if one is trying to determine the likely trajectories of the ongoing developments, much more is needed. Nonetheless, we expect that in the near future, the Nordic media accountability models will exhibit more differences than before: starting from the organisational structure of professional self-regulatory institutions to the contents and coverage of the ethical codes.

The divergence of the roles and responsibilities of journalistic self-regulatory bodies in the digital age challenges the assumption of homogeneity within the Nordic approaches to accountability. On the contrary, it reflects the unique sociocultural, political, and historical contexts of each country as well as variations in their current responses to global challenges. As these systems adapt to the complex demands of the digital era, we anticipate they will continue to evolve in different directions, each marked by a variety of distinct professional, organisational, and online instruments. Hopefully, these experiences will enrich the global discourse on media accountability and the principles of a media welfare state.

Acknowledgements

This chapter was finalised with support from the Media Industry Research Foundation of Finland (grant number 2020026); and the Foundation for the Promotion of Journalistic Culture (JOKES) (grant number 20220415) provided for Randa Romanova’s doctoral project “Journalistic self-regulation in the Nordic countries: The challenge of artificial intelligence and news automation”.

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