DIACOMET

„Fostering capacity building for civic resilience and participation: Dialogic communication ethics and accountability"

Comparative analysis of the role of dialogic communication in international ethics codes and guidelines

Analytical report

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Executive summary

This working paper investigates how dialogic communication ethics (DCE) are reflected in codes of ethics and other normative guidelines for public communication. With the overarching goal of fostering civic resilience in democratic societies, the study seeks to identify Principles of Good Communication Conduct (PGC) based on dialogic norms and inclusive accountability. The study builds on prior theoretical work within the DIACOMET project and addresses **four key research questions**: (1) What moral dilemmas arise in public communication codes? (2) What principles of DCE are represented? (3) How is inclusive accountability operationalised? (4) How is compliance ensured?

Methodologically, the research combined **quantitative and qualitative content analysis of 429 ethical codes and communication guidelines from eight European countries** (Austria, Estonia, Finland, Hungary, Lithuania, the Netherlands, Slovenia, and Switzerland), plus supranational documents. Codes from various sectors (e.g., journalism, advertising, public institutions, and digital platforms) were analysed using a structured four-stage process of scanning, selecting, analysing, and implementing. Documents were coded for moral tensions (e.g., privacy vs. transparency), DCE principles (e.g., responsibility, loyalty, autonomy), inclusive accountability practices (e.g., inclusivity, diversity, resilience), and compliance mechanisms.

The analysis reveals **limited alignment with the principles of DCE**, which emphasize equal participation for all communicative actors. Most documents focus on journalism, while media users and civic actors are underrepresented. Accountability frameworks are primarily institutional or market-based, with few public- or citizen-centred models. Additionally, most texts are non-binding and lack concrete compliance mechanisms. Ethical challenges posed by emerging technologies, particularly artificial intelligence, are rarely addressed.

Qualitative findings show that **traditional ethical dilemmas** – such as tensions between truth-telling and confidentiality, and between privacy and transparency – **are frequently discussed**, reflecting long-standing concerns in journalism ethics. While many documents reference **dialogue or participatory communication**, these mentions **are often marginal** and not substantively developed, even in documents directed at citizens or non-professionals.

Responsibility is a widely shared ethical principle across the corpus, increasingly framed as a shared duty among professionals and digital media users. **Loyalty** also appears frequently, though it is less emphasized in citizen-oriented documents. **Autonomy** – especially editorial

and organisational independence – is a recurring theme, along with calls for political independence beyond traditional media.

Encouragingly, **inclusivity** and **diversity** are prominently addressed in texts linked to public interest and civic engagement. Many guidelines advocate for equitable access, anti-discrimination, and the empowerment of diverse user groups. International documents in particular stress linguistic and procedural diversity. **Resilience** is another emerging value, with documents supporting both the empowerment and safety of communicators, particularly in digital spaces. However, **mechanisms to ensure adherence to these principles are largely absent** or outsourced to external co-regulatory bodies beyond the study's scope.

In sum, the findings of the empirical study highlight the need for more robust, inclusive, and enforceable ethics frameworks. This imperative will inform the next phases of the DIACOMET project – especially in shaping a new set of PGC, aimed at enhancing dialogic and accountable communication in the digital age.

List of tables and figures

1. Introduction

The ongoing digitalisation and hybridisation of media, along with the current boom in artificial intelligence (AI), are fundamentally reshaping the way people communicate (Chadwick, 2017). However, the question of what constitutes 'good communication conduct' in this time of transformation remains largely unresolved. Across the globe, numerous examples illustrate the risks of digital communication: various forms of hate speech, cyberbullying, misinformation, and disinformation. These and other forms of dysfunctional online communication are often described as the 'dark side' of participatory media ecosystems (Quandt, 2018). Until now, discussions on the norms and values of public communication – primarily grounded in the traditional paradigm of professional journalism ethics – have provided little guidance on how to effectively address these challenges.

In response to these issues, the Horizon Europe project "Fostering Capacity Building for Civic Resilience and Participation: Dialogic Communication Ethics and Accountability" (DIACOMET) seeks to develop solutions by exploring and leveraging the potential of dialogic communication processes for democratic societies. DIACOMET's primary objective is to foster capacity building for civic resilience and to establish a concept of dialogic communication ethics (DCE). This framework aims to create an inclusive model of accountability mechanisms, combining media accountability (at the organisational level) with civic accountability (at the citizen level).

Within this framework, DIACOMET partners intend to develop the **Principles of Good Communication Conduct (PGC)** – a new type of research-based guidelines for communication ethics that can also be applied in practice. By doing so, the project fulfils a key objective of Work Package 2 ("Code & Accountability"), namely, to "identify principles of an inclusive ethics of dialogic communication and summarise them in a new Civic Code of Good Communication Conduct" (Grant Proposal, pp. 6, 14, 29 Part B). The key findings of this process are presented in the following sections of this working paper, which also serves as DIACOMET's official Deliverable D2.2. These findings consolidate insights from a core empirical sub-study of the project and form the basis for various dissemination activities and policy recommendations to be developed in the project's final year.

This report presents a **comparative analysis of the role of dialogic communication in international ethics codes and guidelines**. From a methodological perspective, it is based on a structured and systematic document analysis (Altheide & Schneider, 2013; Hsieh & Shannon, 2005; Prior, 2003) of various types of ethical codes and similar guidelines – both

from the countries participating in the DIACOMET project and from supranational contexts. This analysis aims to answer two key questions: (1) What normative principles can provide guidance for all stakeholders under the conditions of dialogic communication and (2) how can compliance with these principles be ensured? (Grant Proposal, p. 14 Part B).

To achieve this, the study follows a two-stage analytical procedure. The first step involved systematically collecting different ethics codes and guidelines for public communication, extending beyond the well-researched field of journalistic codes (see, for example, Lauk, 2022) to include all forms of public communication – involving stakeholders such as journalists, PR professionals, advertisers, digital platform operators as well as media users. The results of this collection process are available in a searchable online database on the DIACOMET website (https://diacomet.eu/database/). In the second step, the collected documents were subjected to a comparative analysis that combined quantitative and qualitative evaluation methods. This analysis was based on a conceptual framework of DCE and accountability variables, which had been previously developed in a theoretical working paper as part of the DIACOMET project (Deliverable D1.1: Harro-Loit et al., 2024).

This report aims to summarise all relevant theoretical and methodological considerations of the study, as well as its key empirical findings. This objective is reflected in the structure of the main sections: Following the introduction, **Section 2** outlines the theoretical foundations relevant to the document analysis, summarising previous project results from DIACOMET Deliverable D1.1. Based on this, specific research questions are derived, forming the starting point for the subsequent analysis. **Section 3** explains the methodological approach of the document analysis and provides a detailed description of the analysed document corpus. The core of the report, **Section 4**, presents the detailed results of the comparative document analysis. **Section 5** syntheses and contextualises the key findings. The discussion of the empirical data makes it possible to identify various gaps in the analysed documents, which are addressed by a first draft of DIACOMET's own PGC. These are documented in the **Appendix** of the report.

2. Theoretical background

The theoretical foundation for the document analysis rooted in the theory of dialogic communication ethics (DCE), and the normative frames interlinking the various disciplinary approaches that define dialogic communication, communication ethics, moral thinking,

existing scholarship on media accountability and ethics. The conceptual work was outlined in a theoretical working paper on DCE (Harro-Loit et al., 2024), compiled within Work Package 1 of the DIACOMET project, and was based on a comprehensive literature review. The conclusions drawn about the relevance of DCE in fostering civic resilience and participation served as the basis for formulating the Research Questions central to the document analysis presented in the following parts of this paper. Specifically, the theoretical approaches to the following themes informed the inquiry:

1. Moral conflicts and dilemmas,
2. Normative principles of dialogic communication,
3. Normative principles of inclusive accountability, and
4. Compliance-related aspects.

These approaches provided the theoretical perspective for conceptualising and defining the analytical categories used in our document analysis (see Section 3 for more detailed information on the methodological approach) and establishing predefined sets of conceptual variables. This theory-driven methodology enabled iterative and reflective connections between DCE and the objects of study – namely, ethical codes and other guidelines for public communication. The subsequent sections outline the primary thematic and theoretical pillars upon which the analytical framework and the codebook for the document analysis were built.

2.1 Themes of moral conflict and dilemma

Moral conflicts and dilemmas are central to DCE, though these concepts are universal and extend beyond communication. Nevertheless, communicative situations often serve as "testbeds" for exploring ethical choices. A moral dilemma is a specific type of moral conflict where the possible courses of action are equally good – or equally problematic – even after careful deliberation. Distinguishing between a moral conflict and a moral dilemma requires sound judgment, as it can be challenging to prioritise normative requirements (e.g., obligations or responsibilities) in terms of their significance. A moral disagreement arises when the involved parties differ in perceiving or interpreting the underlying moral conflict. Importantly, the topic and the concept of moral disagreement are inevitably linked to DCE and call for the identification of necessary competencies for dealing with unresolvable moral disagreements.

For DIACOMET's document analysis, moral disagreements prevalent in contemporary democratic societies and public discourse were prioritised. Although these disagreements are not inherently tied to communication ethics, they typically necessitate moral reasoning among actors in communicative contexts. The concept-driven and theory-based literature review within the DIACOMET project (Harro-Loit et al., 2024) identified a comprehensive range of topics relating to moral disagreements. For instance, moral tensions frequently arise between the need to safeguard individual privacy and informational self-determination, and the equally important demand for transparency. Similarly, the assertion of personal autonomy often conflicts with the public's legitimate interest in disclosure – a dilemma that becomes especially pronounced in debates over data protection, including the individual's right to be forgotten, which is frequently contested by the public's right to know. Another prominent area of moral disagreement concerns the boundaries of free speech – a fundamental human right – and the imperative to protect against various forms of hate speech and extreme speech, a challenge that is particularly salient in the context of algorithmic content moderation on social media platforms (Udupa et al., 2023). Furthermore, questions about how to manage the disclosure of sensitive identity-related information (e.g., gender, race, religion) in public discourse, while simultaneously safeguarding personal data, remain morally contentious. Conflicts also emerge between professionals' duties of loyalty – particularly in the case of civil servants – and the public's right to information, as illustrated in whistleblowing cases. A further example of ethical disagreement among professionals concerns the moral acceptability of using deceptive methods to obtain information in the public interest (Christians et al., 1991).

Our interest in understanding how codes of ethics address these and similar moral disagreements informed the formulation of **Research Question 1** (RQ1), which aimed to identify the key topics underlying such ethical tensions. Accordingly, RQ1 asked: *What are the key topics and themes that give rise to ethical challenges in dialogic communication, as reflected in codes of ethics?* Through content analysis, we sought to determine which themes and issues of moral disagreement are emphasised in ethical codes and guidelines for public communication, and which are neglected. To this end, we predefined the following variables for the content coders:

1. **Privacy versus Transparency:** Conflicts between individual privacy and the public's right to know.
2. **Hate Speech versus Freedom of Expression:** Responsibilities and limits of speakers, particularly in balancing freedom of speech and inclusivity.

3. **Sensitive Issues versus Inclusivity:** Balancing the representation of minority voices with sensitivity to broader societal norms.
4. **Loyalty versus Public Interest:** Tensions between organisational/professional loyalty and public interest.
5. **Truth-telling versus Confidentiality:** Balancing truth-seeking and protecting confidential sources.
6. **Child Protection versus Self-determination:** Conflicts between safeguarding children's privacy and respecting their freedom of expression.
7. **Manipulation versus Political Free Speech:** Addressing propaganda and manipulation while preserving political expression.
8. **Other (Open coding):** Any additional themes or topics of moral disagreement.

2.2 Principles of dialogic communication

Next, we narrowed our analytical focus from the broader questions of moral disagreement to the specific domain of dialogic communication. Our objective was to explore the extent to which the analysed documents reflect the normative principles of DCE, as conceptualised by Ronald Arnett and colleagues (2009). Arnett et al. define DCE as a branch of communication ethics that foregrounds agency and the role of embedded agents in dialogue. It is "attentive to the emergent, not owned by either party in the conversation, and responsive to multiple goods that give rise to and emerge in ongoing conversations, protecting and promoting the good of learning" (p. 45). This form of dialogue – both as a conceptual framework and as lived interaction – treats all participants as equal contributors, encouraging a two-way communication process grounded in listening, empathy, and the continuous negotiation among diverse actors. As such, dialogue is understood as a collaborative and dynamic interaction that prioritises mutual understanding and learning.

Our analysis therefore focused on the **actors** within dialogic situations, specifically identifying individuals or groups engaged in moral reasoning and making ethical decisions within public communication contexts. This actor-centred approach enabled us to delineate and assess the roles and responsibilities of participants, as well as the ethical dimensions – such as loyalty, autonomy, and responsibility – that underpin their decision-making, thus examining their agency.

Accordingly, our **2nd Research Question** (RQ2) investigated the components of moral reasoning and ethical choice, asking: *What are the normative principles of dialogic*

communication ethics displayed in codes of ethics – particularly with regard to actors and agency, duties of loyalty, as well as autonomy and responsibility?

One of the central analytical concerns was the **duty of loyalty** as it applies to the actors engaged in dialogue. Hence, our study examined whether the codes of ethics addressed different forms of loyalty and provided principles for resolving or mitigating loyalty conflicts, particularly in relation to freedom of information, transparency, and the professional obligations of those addressed by the codes. Coders considered the nature of loyalties at play, the potential for conflict, and the ethical mechanisms proposed to navigate such tensions.

A second line of inquiry concerned the **autonomy** of the actors. Here, the analysis focused on the question whether codes of ethics offered references to the independent and autonomous actions of individuals, and to the principles that uphold autonomy, such as independence and agency.

Finally, the analysis also focused on the principle of **responsibility**. In this respect, we investigated whether the documents addressed legal or ethical responsibilities borne by the actors, and whether they articulated principles of responsible communication – such as the limits of freedom of expression and the duty to respect others.

2.3 Principles of inclusive accountability

The next pillar of our analysis focused on accountability in public communication, which is a foundational concept. It represents a social, political, and legal relationship "between an actor and a forum in which the actor has an obligation to explain and to justify [their] conduct, the forum can pose questions and pass judgment, and the actor may face consequences" (Bovens, 2007, p. 452). Accountability procedures inherently involve a strong communicative component, including questioning and justification, which fosters a mutually reinforcing dialogue. As a virtue, accountability refers to answerability and the associated ethical strategies (Bovens, 2010; Dubnick, 2003).

In the context of media and communications, accountability is intrinsically linked to media governance (McQuail, 2003). The diverse contexts in which accountability plays a significant role are conceptualised as "frames" of media accountability, as identified by Bardoel and d'Haenens (2004; see also Fengler et al., 2022). These frames encompass:

1. The perspective of the media professions,

2. The market,
3. The political sphere, and
4. The public.

Our analysis was specifically interested in processes of public accountability, particularly in relation to the media's role in maintaining direct relationships with members of the public, such as citizens. These processes are closely linked to DCE among members of the public. Our theory-driven analytical model recognised that codes of ethics serve as key instruments in initiating media accountability processes (Eberwein et al., 2018). However, little is known about which normative principles of accountability are most closely associated with DCE – especially with regard to inclusivity in dialogue, a core principle of DCE.

To address this gap, we formulated **Research Question 3** (RQ3): *What factors, mechanisms, and conditions render accountability in public communication inclusive?* Specifically, our inquiry sought to answer the following sub-questions:

- Who is deemed eligible to participate in discussions about ethical conduct?
- Who is invited and involved in these processes?
- What role does dialogue play in accountability mechanisms?
- Under what procedural conditions, and with what outcomes, does dialogue take place?

Our aim was to explore the extent to which accountability instruments facilitate judgments concerning:

- the agents themselves (i.e., their virtues and vices, often inferred from motives);
- the rightness or wrongness of their actions (a deontological perspective); and
- the goodness or badness of outcomes (a teleological perspective).

Within the broader theme of accountability, we specified three interrelated dimensions for detailed analysis – inclusivity, diversity, and resilience – based on theory-led assumptions about the key components of ethical dialogic processes.

Firstly, we explored which factors, mechanisms, and conditions contribute to making accountability **inclusive**, focusing on the relevant references in the codes of ethics. Content coders analysed only those pre-selected codes that addressed dialogic principles and searched for 'good practices' within this category.

Secondly, our analysis turned to **diversity**, identifying references to its various content-related aspects. These included: linguistic diversity (e.g., the use of multiple and inclusive languages); representation of minority voices and cultural inclusivity; and societal diversity, including gender, age, ethnicity, and other perspectives. We developed a priori codes for linguistic, cultural, and societal diversity to guide the analysis. In parallel, we investigated the organisational and procedural aspects of diversity. This involved identifying references in the codes of ethics to the involvement and participation of multiple actors in the implementation of accountability mechanisms. Coders searched for explicit mentions of diversity in relation to procedural or governance rules and highlighted instances of 'good practice' – those deemed especially detailed, thoughtful, or exemplary. To structure this analysis, we developed a priori codes, such as (non-)discrimination in action, organisational diversity, procedural inclusion, and governance-related inclusivity in accountability practices.

In addition, we integrated the concept of **civic resilience** into our investigation of accountability. In the context of DCE, civic resilience refers to a socio-constructivist process that enhances individuals' moral awareness of universal ethical principles of communication, as well as their moral sensitivity and capacity for moral recognition (Hall & Lamont, 2013). In public communication, civic resilience is particularly relevant to individuals' ability to respond constructively to potential threats and harms associated with the evolving information environment, which could relate to political or social issues that might trigger various individual and group responses (Hendrickx, 2022; Marin & Copeland, 2022; Hofmann, 2019). Accordingly, we examined how inclusive accountability procedures might contribute to fostering civic resilience. Content coders searched the codes of ethics for textual references related to empowering and motivating individuals – as citizens – to engage in dialogue and for provisions ensuring a safe environment in which dialogue can thrive.

2.4 Compliance

Finally, our research into the various normative principles of DCE also aimed to provide guidance for all stakeholders involved in dialogic communication. To this end, we examined how and under what conditions compliance with the normative principles of DCE – identified through addressing RQ2 and RQ3 – can ultimately be safeguarded.

In this endeavour, we investigated potential relationships between the normative principles of dialogic ethics (RQ2), inclusive accountability (RQ3), and the contextual factors influencing compliance. These factors included, among others, the legal and regulatory context of the codes – namely, whether they were developed voluntarily as part of self-regulation ("non-

mandatory") or were legally mandated as part of co-regulation ("mandatory") – as well as the aspect of implementation and enforcement (i.e., whether compliance with the documents in question was "voluntary" or "procedural").

Accordingly, our **final Research Question** (RQ4) addressed the following inquiry: *Is there evidence of a relationship between references to the normative principles of dialogic ethics and inclusive accountability, and contextual factors of compliance – specifically, the legal and regulatory context, as well as implementation and enforcement?*

3. Methodological approach and description of the corpus

In order to answer the research questions, we conducted an empirical study of codes of ethics and other normative guidelines for public communication. The following section summarises the methodological design of this document analysis, which was realised in a collaborative effort involving all research teams within DIACOMET. The methodological discussion is followed by a description of the corpus of documents analysed, including short spotlights on the sample from the perspective of all participating countries.

3.1 Methodological approach

The analysis was conducted in the eight European countries covered by the DIACOMET project: Austria, Estonia, Finland, Hungary, Lithuania, the Netherlands, Slovenia, and Switzerland. This selection of countries represents different types of media systems in Eastern and Western Europe (Dobek-Ostrowska et al., 2010; Hallin & Mancini, 2012; Peruško et al., 2020), but at the same time focuses primarily on societies with comparatively small populations. As argued in the project grant proposal (p. 11 Part B), DIACOMET follows the assumption that small countries are particularly suitable for investigating ethical standards and policies because even local communication crises appear more pronounced and attract proportionately more attention than in large societies. The problems of society's resilience when facing communication and information disorders become visible quicker and clearer and are thus easier to identify. On the other hand, small countries can react more flexibly to policy challenges and information disorders than big countries. This seems particularly relevant for a systematic investigation of new types of governance challenges such as the question of responsible dialogic communication practices in digital media ecosystems.

For the study presented here, a two-stage empirical research process was realised in all eight DIACOMET countries, combining quantitative and qualitative approaches:

The **first stage** of the study involved systematic, theory-based data collection, indexing, and annotation in line with the logic of a document analysis (Altheide & Schneider, 2013; Hsieh & Shannon, 2005; Prior, 2003). In this process, all research partners involved in the project identified examples of ethical codes and other guidelines for public communication in their own countries and at supranational level. To this end, various types of codes/guidelines were defined in advance, each of which was to be represented by at least two to three typical documents in each country (in detail: codes/guidelines for journalists, for advertisers, for PR professionals, for corporate communicators, for public institutions, for small-scale or individual media, for media users). Within these segments, different levels of codes/guidelines (macro, meso, micro) were also represented where possible, resulting in a heterogeneous mixture of documents with varying forms of institutional affiliation. Documents were only taken into account if they complied with the principles of self-regulation and accountability in public communication (Fengler et al., 2022). Legislative texts – understood as 'hard law' – were therefore excluded from the data collection, as were numerous guidelines that primarily deal with interpersonal communication practices. Research partners collected a total of 429 national and international documents in this process, and most of them were subsequently made available to interested stakeholders in an interactive database on the DIACOMET website (https://diacomet.eu/database/) – unless their originators insisted on confidentiality. Due to the purposive selection strategy, the database cannot fulfil the claim of representativeness, but it can offer a systematic overview of codes of ethics and additional guidelines for all types of public communication that does not exist in this form in previous research.

The data collection process was supplemented by standardised indexing and annotation, for which the collaborating researchers extracted relevant basic information and additional contextual data for all documents. Relevant categories included: the name of the code, the originator of the code, the relevant country, the document's original language, its year of creation, the year of its last adaptation, its length, the type of code, the main frame of accountability – as well as contextual information indicating, among other things, the document's scope, its degree of transparency, its legal and regulatory context, its organisational status, its mode of implementation and enforcement, and binary codes used to indicate the relevance of the document for issues related to diversity and AI. Additionally, researchers provided short abstracts highlighting key characteristics of each of the documents to enable all members of the multinational research consortium to grasp the

contents at a glance. Some of the categories were also used for DIACOMET's public online database to facilitate keyword-based search processes. In order to allow for a collaborative analysis within the project team, all non-English documents were translated into English with the help of DeepL (https://www.deepl.com/translator).

While the initial analytical steps followed a theory-driven deductive approach, aiming to quantify key characteristics of the corpus of ethical codes and guidelines, the **second stage** of the empirical study involved a more detailed in-depth analysis of the material. In this phase, the entire sample of 429 previously collected documents underwent a category-guided qualitative analysis, based on a predefined set of conceptual variables relevant to the principles of DCE (see the coding manual in the Appendix for more details). The analysis adhered to the ideas of a structuring content analysis (Mayring, 2014) to assess, for example, the extent to which the documents align with the key categories of DCE. This approach was complemented by inductive coding in those contexts where no predefined variables were available. The multi-stage analytical process was facilitated by the MAXQDA software (VERBI Software, 2021), which supports both theory-driven, deductive coding as well as inductive approaches. Ultimately, our research strategy enabled the refinement of the theory-based category system (Kuckartz, 2014) developed in the previous phase of the project (see Section 2 above) and helped to identify significant gaps in the analysed documents. This served as a valuable foundation for developing DIACOMET's Principles of Good Communication Conduct as a new, inclusive media accountability instrument – one of the key outputs of the project.

The codebook underlying the analysis served not only to operationalise the theoretical concepts described in Section 2 but also to provide detailed coding instructions for the researchers involved. At its core, a four-stage coding process was developed, consisting of the phases: (1) scanning, (2) sorting/selecting, (3) analysing, and (4) implementing.

- **Scanning**: In the first step of the coding process, all analysed documents were searched for the themes of moral conflict and dilemma identified in Section 2.1. Additionally, up to five key themes were highlighted for each document to provide an overview of the central content.

- **Sorting/Selecting**: Step 2 of the coding process focused on identifying documents that promised further insights relevant to the study's theme. All documents with specific references to various aspects of dialogical communication – either from a conceptual or practical perspective – were highlighted and recommended for further analysis. All other documents were excluded from the subsequent coding process.

- **Analysing**: The third step of the coding procedure represents the core of the investigation presented here. All documents selected in step 2 were examined in detail for characteristics of dialogical communication ethics (see Section 2.2) and inclusive accountability (see Section 2.3).

- **Implementing**: In order to assess aspects of compliance in the examined documents (see Section 2.4), potential relationships between the normative principles of dialogic ethics and inclusive accountability as well as relevant contextual variables identified in the preceding quantitative analysis were explored.

The described procedure was subjected to a pretest by three of the eight participating research partners before the actual analysis began, in order to assess the applicability of the underlying category system. As a result, some of the variables under investigation were refined, and the coding instructions in the codebook were expanded. This constituted an essential prerequisite for the collaborative analytical process, in which all research partners participated equally. After the coding phase, all partners also took part in an inter-coder quality assurance procedure, designed to ensure consistency and reliability in the application of the analytical concept. For this purpose, each coder was tasked with coding at least five additional documents from another country, in addition to their own country's sample. This process covered approximately 10% of the total sample and served as a solid foundation for validating consistency across national teams.

The following Section 3.2 summarises key findings from the first phase of the empirical study, providing an initial overview of the compiled sample, including insights from the participating research countries. The results of the second research phase are collected in a separate Section 4, which is dedicated to qualitative analysis.

3.2 Description of the corpus

Using the sampling procedure described above, a total of 429 codes of ethics and similar guidelines dealing with practices of public communication could be identified by the project-internal cut-off date of 30 September 2024. 344 of these documents (80.2% of the total sample) could be ascribed to individual countries represented by the DIACOMET project. 85 documents (19.8%) had an international background. Accordingly, it is not surprising that only less than one-third (30.5%) of the documents are available in English; the rest are written in a language other than English. The average length of all compiled documents is 3,597 words. The oldest document in the sample was the *ICC Advertising and Marketing*

Communications Code[1], which came into force in 1937 (last adapted in 2018[2]); the most recent one dates from 2024 (namely the *Artificial Intelligence Guidelines* by the Swiss Press Council). According to the analysis, many other documents have also been adapted to the realities of digital communication: Although at least 27 of the documents date from before 2000, only few of them still exist in their original version.

Table 1 shows the distribution of national documents across the different countries and also indicates the number of documents, differentiated according to their target audience (type of code): the largest proportion of the collected documents is tailored to the field of application of journalism (35.7%); another quite large proportion of 21.7% relates to public institutions (such as public authorities, etc.). Only 15.4% of the documents are specifically addressing the needs of media users. Other areas of application remain marginalised in the sample.

Table 1: Type of documents per country

	Type of code								
	Journalism	*Advertising*	*PR*	*Corporate*	*Public Inst.*	*Small Scale*	*Media Users*	*Other*	*Total/ country*
Austria	15	2	10	4	17	12	19	2	81
Estonia	6	2	1	1	17	0	1	5	33
Finland	18	2	4	1	8	3	6	0	42
Hungary	24	3	1	1	0	0	0	0	29
Lithuania	12	1	2	4	7	0	5	5	36
Slovenia	9	2	2	3	6	2	3	4	31
Switzerland	34	2	1	7	5	1	8	0	58
The Netherlands	16	1	1	1	9	1	4	1	34
International	19	6	6	2	24	0	20	8	85
Total/type	153	21	28	24	93	19	66	25	429
Percentage	35.7%	4.9%	6.5%	5.6%	21.7%	4.4%	15.4%	5.8%	100%

A look at the main frames of accountability (Table 2) shows a clear overrepresentation of documents in the market frame: codes and guidelines at the level of (media) companies

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[1] Provided the documents mentioned below are included in our publicly accessible DIACOMET database, we refer, upon first mention, to the corresponding subpage featuring a detailed annotation along with a link to the full text.

[2] The *ICC Advertising and Marketing Communications Code* underwent another update in 2024 to address new challenges facing the advertising and marketing industry, including influencer marketing, AI, and environmental claims. As the data collection for our study was completed prior to this update, the most recent version of the document was not taken into account in the analysis.

account for a good 44.5% of the sample. The professional frame, which bundles various documents at the level of the media professions, is also comparatively strongly represented at 26.6%. In contrast, the public frame (19.1%) and the political frame (9.8%) are less important.

Similarly, when different levels of codes are distinguished, the meso level, to which all documents that address actors in a corporate context were counted, clearly dominates. They account for almost 58.7% of the sample. Documents at the macro level, targeting larger aggregates of actors (e.g., the journalists in a given country), make up 34.5% of the sample. In contrast, micro-level documents, targeting actor groups with a low degree of institutionalisation (such as codes by small-scale/individual media) remain an exception (6.8%).

Table 2: Main frame of accountability and level of documents per country

	Main frame of accountability					Level of code		
	Professional	*Market*	*Political*	*Public*		*Macro*	*Meso*	*Micro*
Austria	14	35	12	20		16	53	12
Estonia	23	3	1	6		10	19	4
Finland	4	30	0	8		8	30	4
Hungary	8	21	0	0		11	18	0
Lithuania	12	14	3	7		12	24	0
Slovenia	13	6	3	9		15	11	5
Switzerland	9	41	1	7		15	42	1
The Netherlands	5	17	10	2		12	19	3
International	26	24	12	23		49	36	0
Total/category	114	191	42	82		148	252	29
Percentage	26.6%	44.5%	9.8%	19.1%		34.5%	58.7%	6.8%

The first phase of the document analysis also made it possible to collate some specific contextual factors for the codes and guidelines collected (see Table 3). These included, for example, information on transparency. As the coding of the DIACOMET partners shows, a clear majority of the documents are publicly accessible (96.7%); non-public documents were only included in the sample in 3.3% of all cases. With regard to the organisational status of the documents, the evaluation shows that a majority of 62.2% of the documents are perceived as publicly-oriented and non-commercial; a clear private-commercial character only shines through in 37.5% of the cases.

The legal and regulatory context of the documents also varies: the majority of the collected codes and guidelines are non-mandatory texts (78.1%); only 21.9% of them are mandatory. When looking at aspects of implementation and enforcement, this corresponds to a high proportion of voluntary documents (67.8%), while one third of them (32.2%) is linked to an established mechanism with an assigned body.

Table 3: Contextual information on the documents per country

Transparency

	Public	Non-public	Percentage/ Public
Austria	78	3	96.3%
Estonia	33	0	100%
Finland	34	8	81.0%
Hungary	28	1	96.6%
Lithuania	36	0	100%
Slovenia	31	0	100%
Switzerland	58	0	100%
The Netherlands	32	2	94.1%
International	85	0	100%
Total	415	14	96.7%

Organisational information

	Public	Private	N/A	Percentage/ Public
Austria	51	30	0	63.0%
Estonia	32	0	1	97.0%
Finland	24	18	0	57.1%
Hungary	11	18	0	37.9%
Lithuania	20	16	0	55.6%
Slovenia	25	6	0	80.6%
Switzerland	26	32	0	44,8%
The Netherlands	19	15	0	55.9%
International	59	26	0	69.4%
Total	267	161	1	62.2%

Legal and regulatory context

	Non-mandatory	Mandatory	Percentage/ Non-mandatory
Austria	76	5	93.8%
Estonia	23	10	69.7%
Finland	31	11	73.8%
Hungary	24	5	82.8%
Lithuania	14	22	38.9%
Slovenia	23	8	74.2%
Switzerland	58	0	100%
The Netherlands	31	3	91.2%
International	55	30	64.7%
Total	335	94	78.1%

Implementation and enforcement

	Voluntary	Procedural	Percentage/ Voluntary
Austria	64	17	79.0%
Estonia	19	14	57.6%
Finland	22	20	52.4%
Hungary	23	6	79.3%
Lithuania	8	28	22.2%
Slovenia	15	16	48.4%
Switzerland	56	2	96.6%
The Netherlands	29	5	85.3%
International	55	30	64.7%
Total	291	138	67.8%

An interesting detail on the relevance of the documents for current media developments: only a small proportion (14.7%) of the codes and guidelines refer to issues relating to responsible use of AI and the automation of communication. However, the proportion of

international documents in the sample is slightly higher in this context than the overall average. On the other hand, the question of diversity seems to be an issue relevant for many national and international codes and guidelines, as it is mentioned in 58.3% of the document collected.

The following sections summarise key characteristics of the sample from the perspective of the countries studied. The presentation is organised in alphabetical order.

Austria

Austria is a Central European country with a population of 9.2 million (Statistik Austria, 2024) and a comparatively long democratic tradition (see also Kouts-Klemm et al., 2024). Its media landscape is characterised by oligopolistic structures (Trappel, 2017) and a high concentration of media ownership (Seethaler & Melischek, 2006). According to the Austrian Journalism Report (Kaltenbrunner et al., 2020), there are approximately 5,350 professional journalists in Austria. While the professionalisation rate was historically low, the proportion of journalists with academic degrees now exceeds that of the general population – highlighting Austria's alignment with the Democratic Corporatist Model of media systems (Hallin & Mancini, 2004; see also Karmasin et al., 2018). Historically, Austria's dual media system has been shaped by political parallelism, which continues to influence the contemporary media landscape. Nevertheless, the fundamental principles of a functioning democratic media system are upheld (Seethaler & Beaufort, 2024).

The Austrian dataset comprises 81 ethical codes and guidelines, the oldest of which – the *Code of Honour for the Austrian Press* issued by the Austrian Press Council – was introduced in 1961. While most codes focus on market-oriented netiquette guidelines for media users, various regulations apply to public institutions (e.g., the City of Vienna) or individual media outlets (e.g., editorial statutes of ORF and Kurier). Additionally, guidelines for small journalistic blogs, academic blogs, and influencers are included. Non-commercial community broadcasters such as Verein Freies Radio Wien, DorfTV, and Okto are officially recognised and supported by KommAustria, the independent regulatory authority – an aspect particularly noteworthy in the context of dialogic communication. The analysis of accountability frameworks reveals that market-oriented guidelines account for approximately two-fifths of the total, primarily due to the high number of regulations for media users and individual outlets. In contrast, professional, public, and political frameworks each constitute around one-fifth, indicating an even distribution among these categories.

Estonia

Estonia is a Northern European country that joined both the European Union and the North Atlantic Treaty Organization in 2004. With a population of only 1.3 million (Statistics Estonia, 2025), its media market is relatively small and characterised by oligopolistic structures (Harro-Loit & Loit, 2023). According to Kantar Emor (2022), the total value of the Estonian advertising market amounted to €88.7 million in 2021. Although no official statistics exist on the number of journalists in Estonia, researchers participating in the Worlds of Journalism study estimate the figure to be between 800 and 1,000. Estonian journalistic culture is increasingly aligning with Nordic standards, underpinned by a tradition of academically supported journalism education (Berglez et al., 2024). In comparison to other Central and Eastern European countries, the level of political parallelism in Estonia is considered low (Rožukalne et al., 2024).

The Estonian sample for the DIACOMET study includes 33 codes and guidelines covering a diverse range of professions, from journalism and media to teaching, social work, public administration, research, and law. Despite this variety, all codes reference public communication, such as publishing information, responding to media inquiries, or expressing opinions publicly. However, not all explicitly address dialogue. Interestingly, some non-media-related codes do, such as the *Estonian Code of Teacher Ethics*, which emphasises openness to criticism and the ability to respond thoughtfully. Another key aspect is the age of these codes. Many journalism and media-related guidelines, including the *Code of Ethics for Estonian Journalism* (1998), are outdated and have not been revised. This is reflected in their content, as they lack references to contemporary issues like disinformation, fake news, diversity, and empowerment.

Finland

Finland, with a population of 5.6 million (Statistics Finland, 2024), is classified within Hallin and Mancini's (2004) framework as a democratic corporatist media system. It is characterised by strong press freedom, advanced self-regulation, and high journalistic professionalism. These features persist despite changes since the 1990s, driven by commercialisation and media hybridisation (Herkman, 2009). Finland currently has about 14,000 professional journalists (Union of Journalists, 2022), with 80% holding a higher education degree (Väliverronen et al., 2023). While full-time employment is slightly declining, educational attainment continues to rise. Public service broadcasting remains central, with YLE benefiting from economic independence through dedicated taxation. Finland's media system also features a strong regional press and a highly concentrated market (Lehtisaari et al., 2024).

The DIACOMET project analysed 42 Finnish ethical communication guidelines. Of these, 45% pertain to professional codes for journalists and media employees, while others address advertisers (5%), PR professionals (7%), corporate communicators (5%), public institutions (19%), small-scale media (7%), and media users (12%). The sample primarily reflects market (39%) and professional (32%) accountability frameworks. These align with Finland's key self-regulatory bodies, including the Council for Mass Media, the Council of Ethics for Communication, and the Council of Ethics in Advertising, which remain active and widely respected. The *Journalistic Guidelines*, first issued in 1957, are Finland's most recognised ethical document. Public sector communication guidelines, shaped by legal mandates for transparency and citizen participation, place the strongest emphasis on dialogue.

Hungary

Hungary is a medium-sized country in Central Europe with a population of 9.5 million (Központi Statisztikai Hivatal, 2025), which joined the European Union in 2004. While there is no official data available on the exact number of Hungarian journalists, the National Association of Hungarian Journalists' (MÚOSZ) membership consists of about 2,500 journalists, editors, photographers, cartoonists, designers, and PR experts (MÚOSZ, 2024). In Hungary, there is no institutionalised journalism education at the tertiary level. Communication departments in higher education provide some specialised courses for future journalists, but trainings and educational courses are mostly run by market players, professional organisations, and civil society organisations. The country is characterised by media capture (Dragomir, 2019): a distorted, highly polarised media market with extreme ownership concentration, strongly polarised journalism, and a low level of trust in news and facts in general. Public service media are described as more like state media and one of the main distributors of government-controlled propaganda. Only a small free and independent segment of the media maintains a traditional journalistic ethos.

The Hungarian team identified 29 documents, a majority of them from the field of journalism. Almost all the documents are from the last decade, with the *Ethical Guidelines of the Kreatív Group* being the oldest in the sample, from 2009. More noteworthy are the two most influential codes: the *Ethical Code of the National Association of Hungarian Journalists* and the *Self-regulatory Ethical Guidelines* by the Editor-in-Chief's Forum Hungary. The Hungarian media law authorises media market players to set up self-regulatory bodies that have the authority – with exclusive jurisdiction – to implement rules relating to media content (Urbán, 2021). Four organisations have concluded a public contract with the Media Authority since 2011: the Hungarian Publishers' Association, the Association of Hungarian Content Providers, the Association of Hungarian Electronic Broadcasters, and the Advertising Self-

Regulatory Board. Most Hungarian codes of ethics are rather short documents, which can be explained mainly by the specific situation of co-regulation and the fact that the two large-format codes are recognised as binding by several editorial offices and media, meaning that no individualised documents are produced in their case.

Lithuania

Lithuania has a population of 2.9 million (Official Statistics Portal, 2024). In 2022, the country had 1,220 journalists, with 95% holding a higher education degree (Jastramskis et al., 2024). Despite legal flaws and political and economic challenges, Lithuania's democratic framework has remained resilient, creating a relatively favourable environment for the media (Reporters Without Borders, 2024). According to the Media Pluralism Monitor (Jastramskis & Balčytienė, 2024), the risks to media diversity and political independence are relatively low (29% and 32%, respectively). However, political polarisation remains a challenge, particularly for regional and local media, which are more vulnerable to political influence due to financial instability. A lack of media market diversity has persisted in recent years, influenced by global and local factors, including weak legal regulations on cross-media ownership and national competition (Balčytienė et al., 2024; Jastramskis et al., 2023). Additionally, commercial pressures, including advertising and media owner influence over editorial content, have intensified (Jastramskis et al., 2024).

The Lithuanian sample for the DIACOMET study included a total of 36 documents. One-third of these documents (33%) fall under the category of journalism, while public institutions (22%) and corporate communication (17%) are also well represented. The most frequently identified frame of accountability is the market frame, found in almost every second document (47%), followed by the professional frame, identified in 33% of documents. The other frames are comparatively underrepresented. The oldest and most well-known document, particularly among journalists and media professionals, is the *Code of Ethics in Providing Information to the Public*, introduced in 1996 following the enactment of the Law on the Provision of Information to the Public. The code was renewed in 2016. Several documents are relevant to questions of dialogic communication ethics, including the *Code of Ethics for Judges of the Republic of Lithuania* (2022), the *Code of Ethics for Educators* (2018), the *Bitė Group Code of Conduct* (n.d.), and the *Lithuanian Post Code of Ethics* (2021).

The Netherlands

The Netherlands, with a population of over 18 million (Statistics Netherlands, 2025), is typically classified within the Democratic Corporatist Model (Hallin & Mancini, 2004). The Dutch media system is characterised by early establishment of press freedom, high

journalistic professionalism, and a tradition of self-regulation. There are approximately 18,500 journalists in the Netherlands, a third of whom work as freelancers (Nederlandse Vereniging van Journalisten, 2024). The Dutch media landscape combines a diverse and well-established public broadcasting system, organised under the umbrella of the Nederlandse Publieke Omroep (NPO), with a highly concentrated private media market. Commercial broadcasting is largely dominated by two major players (RTL Nederland and Talpa Network) while ownership of print media is mostly concentrated in the hands of two conglomerates (DPG Media and Mediahuis).

The dataset of the Netherlands consists of 34 documents. In the Netherlands, there is a high degree of self-regulation and a strong media law that safeguards media pluralism. The largest share of documents in this sample comes from journalism(-related) organisations. This share can be divided into three levels: first, documents from individual journalistic news titles, such as national newspapers (De Volkskrant and NRC) and small-scale media outlets (blckbx); second, documents from journalistic institutions, such as the Dutch public broadcaster (Nederlandse Publieke Omroep) offering guidelines that apply to the entire organisation; finally, documents from the journalistic sector, such as the Press Council which is in charge of the examination of complaints against violations of good journalistic practice. The other documents in the Dutch dataset are primarily from public institutions, such as the government, police, and universities. These documents are not general guidelines of the institutions, but guidelines in relation to (addressing) citizens.

Slovenia

Slovenia has a population of 2.1 million (Statistični urad Republike Slovenije, 2024). Official data indicate that 2,271 journalists were employed in the country in 2023 (Statistični urad Republike Slovenije, 2023). While there are no formal entry requirements for practicing journalism, the presence of university-level journalism education, professional associations, and self-regulatory bodies plays a key role in the professionalisation of Slovene journalism (Milosavljević & Biljak Gerjevič, 2024). The Slovenian state is actively involved in the media landscape – not only by providing a regulatory framework but also as the founder of the public service broadcaster and the state-owned press agency. It also supports the media through subsidies, state advertising, and other measures, reflecting a model similar to other Central European and Mediterranean countries (Milosavljević & Biljak Gerjevič, 2024). The media market is small, highly concentrated, and marked by complex ownership structures (Milosavljević & Biljak Gerjevič, 2024).

For the DIACOMET study, the Slovenian team analysed 31 documents. The most common category was "journalism" (29% of analysed documents), followed by "public institutions" (19%) and "other" (13%). The primary accountability frame was "professional" (42% of analysed documents), followed by "public" (29%), "market" (19%), and "political" (10%). The oldest document analysed is the *Code of Medical Ethics* (dating from 1992), while the newest are the *Social Networks Usage Policy* by SKB Bank and the *Ethical Code of the Political Party Svoboda* (both from 2022). Among the most well-known ethical codes in Slovenia are the *Code of Ethics for Journalists of Slovenia*, the *Slovenian Advertising Code*, and the *Code of Medical Ethics*.

Switzerland

Switzerland is a small, landlocked country in the heart of Europe, surrounded by large nations like France, Germany, and Italy, and smaller ones such as Austria and Liechtenstein. Since 2024, over 9 million inhabitants live in Switzerland. According to the Swiss Federal Statistical Office, 9,876 journalists were working in Switzerland in 2022 (Office fédéral de la statistique, 2024). However, this number should be interpreted with caution (Wyss et al., 2024), as the boundaries of who qualifies as a journalist are increasingly difficult to define (Dingerkus et al., 2018). The journalism culture in Switzerland is dominated by a Northern European understanding of professional ethics (Hallin & Mancini, 2004). In general, Swiss journalists show a strong commitment to journalistic standards, upheld by self-regulatory bodies such as the Press Council (Porlezza, 2024). Grounded on Hallin and Mancini (2004), Switzerland is part of the Northern European or Democratic Corporatist Model, characterised by an early development of the press, which showed a strong connection between media and politics in the past. Since the 1980s, however, news outlets have mostly decoupled from the political system. This emancipation process occurred later compared to other countries (Porlezza, 2024). Audiences' interest in news is declining – the so-called 'news deprived' have been on the rise, now making up roughly 40% of the adult population – and the willingness to pay for news is stagnating, putting huge economic pressure on commercial media companies (Udris & Eisenegger, 2024).

Overall, we analysed 58 documents in Switzerland. The most common category was "journalism" (58%) and the main frame of accountability was "market" (70%). Among the key documents, three concern news media and journalism – the focus of most texts. One well-known document is certainly the Swiss Press Council's *Code of Conduct, i.e. the Declaration of the Duties of Journalists*. The oldest document we found is actually the same, first issued in 1977. On the other hand, the newest document concerns guidelines regarding the use of AI

in journalism, issued in 2024 by the Swiss Press Council (*Artificial Intelligence Guidelines*). Lastly, about a third of the documents are available in more than one national language, and three are in English only.

International

The European media sector is characterised by structural and cultural diversity, increasingly shaped by global technological developments that transcend national boundaries and redefine the role of media actors and their accountability (Eberwein et al., 2018; Papathanassopoulos & Miconi, 2023). Reflecting this complexity, our dataset also includes 85 supra- and transnational ethical codes and guidelines – 30 at the European level and 55 with broader international applicability. Within this subset, professional and market-oriented frames are particularly prominent. Public institutions are the most common addressees, accounting for over a quarter of the documents. These texts often derive their legitimacy from public bodies or political institutions (such as the *EU Code of Conduct on Countering Illegal Hate Speech Online* by the European Commission). The dataset further comprises the community guidelines of 16 of the 19 Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) designated under the Digital Services Act (DSA) as of April 2023. Representing approximately one-fifth of the international sub-sample, these guidelines are typically aligned with a market-oriented logic. Another fifth consists of journalistic codes and guidelines, often framed within professional discourse at the macro level (e.g. the *European Charter on Freedom of the Press*, endorsed by 48 editors-in-chief and leading journalists from 19 countries). The dataset also includes selected examples relevant to advertising, public relations, and corporate actors. Given its scope, the dataset does not incorporate micro-level cases or guidelines from small media outlets.

4. Empirical results

In the second phase of the empirical study, all 429 documents from the previously described sample underwent a systematic qualitative analysis. The results of this key research step are summarised in the following sections.

4.1 Themes of moral conflict and dilemma

The first stage of the qualitative research aimed at detecting which themes and topics of moral disagreement were salient in the codes of conduct and which were left out. Our research team therefore started the examination by 'scanning' all documents in an *inductive coding process* aiming to identify central thematic as well as structural characteristics. This approach made it possible to uncover underlying patterns and recurring ethical principles within the documents.

The analysis shows that codes and guidelines in public communication, and especially in the media sector, typically follow a standardised structure with recurring components. These include: an introductory statement, presented in a preamble or foreword; a statement on the scope of the code, often in conjunction with a mission statement; a summary of applicable standards and general rules of conduct; a hint at the legal framework and context within which the code is to interpreted; and a statement on the fundamental rules applicable to the form of communication the code is concerned with, such as a delineation of permitted (i.e. obligatory) and forbidden (i.e. precluded) content rules. Additionally, the codes often address matters of formality, tone, and style. Regarding the addressees of the documents, there are usually rules set forth on professional ethical conduct, i.e. on conflicts of interest, working conditions, and operational procedures (e.g., for moderation purposes). The concluding sections often outline the implementation of the code, covering aspects such as compliance, sanctions, enforcement, and, where applicable, a glossary of terms for clear reference.

Moreover, the initial inductive coding allowed us to identify a wide range of core values that underpin the standards articulated in the documents. These values encompass concepts such as: transparency, data protection, disclosure, privacy, confidentiality, fairness, balance, honesty, objectivity, respect, truth/fulness, independence, integrity, impartiality, credibility, accuracy, dignity, autonomy, self-determination, freedoms, human rights, copyrights, equality, diversity, non-discrimination, plurality, and responsibility.

Notably, according to the inductive coding, the concept of dialogue seemed mostly absent or underemphasised in these documents. Hence, we continued the examination with a *deductive analytical procedure* by incorporating *a priori codes* to further explore themes related to moral disagreement and the role of dialogue in ethical decision-making. This methodological step, namely integrating inductive exploration with structured deductive validation, facilitated a more nuanced and multifaceted understanding of how ethical frameworks in public communication engage with, or conversely neglect, the complexities of

dialogue and moral conflict. By bridging these perspectives, the research revealed the implicit assumptions and potential gaps in the ethical codes and guidelines and shed light on their interactions relevant to public discourse.

The following sub-sections explore the prevalence of topics and themes related to ethical issues in dialogic communication, as reflected in the analysed ethical codes and guidelines. The aim of this assessment is to determine which themes of moral disagreement are most prominent and which are comparatively underrepresented, thereby addressing **Research Question 1** (RQ1). Accordingly, our analysis presents measurable results to 'map' the ethical priorities embedded in these codes, offering insight into their relevance for the broader field of public communication ethics.

As Table 4 shows, the most common theme in the analysed documents is 'Truth-telling versus Confidentiality', followed by 'Privacy versus Transparency' and 'Sensitive Issues versus Inclusivity'. The least common themes are 'Manipulation versus Political Free Speech' and 'Child Protection versus Self-determination'. Each of the topics identified in Table 4 is examined in greater depth in the following analysis.

Table 4: Frequency of themes of moral conflict and dilemma

Themes of moral conflict and dilemma	Frequency	Percentage
THEME 5: Truth-telling versus Confidentiality	349	81.4%
THEME 1: Privacy versus Transparency	318	74.1%
THEME 3: Sensitive Issues versus Inclusivity	253	59.0%
THEME 4: Loyalty versus Public interest	243	56.6%
THEME 2: Hate speech versus Freedom of Expression	220	51.3%
THEME 8: Other themes/topics of moral disagreement	141	32.9%
THEME 6: Child Protection versus Self-determination	133	31.0%
THEME 7: Manipulation versus Political Free Speech	131	30.5%
DOCUMENTS with code(s)	426	99.3%
DOCUMENTS without code(s)	3	0.7%
ANALYSED DOCUMENTS	429	100%

The table illustrates the frequency of Themes 1 to 8 (highest to lowest) addressed by the analysed documents (N=429). Multiple coding was allowed.

4.1.1 Privacy versus Transparency (THEME 1)

Theme 1 centres on the tension between respecting individual privacy (informational self-determination) and upholding the public's right to know (transparency). This conflict is addressed in nearly three-fourths (74.1%) of the analysed documents, making Theme 1 one of the most prominent, regardless of national context or type of ethical code.

It is particularly evident in the *Recommendations on the Disclosure of Non-Normative Sexual Orientations, Gender Identities and Gender Characteristics in the Media*, issued by the Slovenian Journalists' Association, the Honorary Court of Journalists, and Legebitra. The document emphasises: "A journalist shall respect the individual's right to privacy and shall avoid sensationalistic and unjustified disclosure of his or her privacy in public. An invasion of privacy is justified only if the public interest outweighs the respect for his or her privacy" (Pos. 5–6).

Automated text search

An additional automated text-search and auto-coding procedure further identified references to Theme 1 in almost two-thirds of the codes. Specifically, the terms "transparen/cy" and/or "privacy" appear in 63.7% of the documents, with privacy-related passages occurring more frequently than those related to transparency.

Privacy as a fundamental right

Privacy as a fundamental right is also emphasised in the European Commission's *The Strengthened Code of Practice on Disinformation 2022*, which states: "The Signatories are mindful of the fundamental right to freedom of expression, freedom of information, and privacy, and of the delicate balance that must be struck between protecting fundamental rights and taking effective action to limit the spread and impact of otherwise lawful content" (Pos. 46).

4.1.2 Hate Speech versus Freedom of Expression (THEME 2)

Theme 2 concerns the boundaries of freedom of expression in relation to hate speech, as well as the duties and responsibilities of speakers in respecting these limits. This ethical and legal tension is illustrated in the following example from the sample: "We perceive freedom of expression as enrichment, but we do not accept any form of bullying, racism, or

discrimination. This applies to all communication activities and especially to social media, as reactions and comments from the public can easily be evoked here." (*A1 Telekom Austria Group Media Ethics Policy*, Pos. 14–15) Concerns about hate speech as a normative constraint on freedom of expression are evident in approximately half of the analysed documents (51.3%). However, the underlying moral dilemmas surrounding the tension between hate speech as a form of expression and the limits placed upon it are only marginally addressed in most codes.

The issue of hate speech is particularly prominent in community guidelines – codes of conduct aimed at media users – issued by major digital platforms such as YouTube, Snapchat, and TikTok (so-called Very Large Online Platforms, or VLOPs). The theme is also reflected in several important soft law documents, including the United Nations' *Our Common Agenda Policy Brief 8: Information Integrity on Digital Platforms*, and the European Commission's *Code of Conduct on Countering Illegal Hate Speech Online*.

Notably, the considerations addressed under Theme 2 partially overlap with those of Theme 3, which focuses on sensitive issues in public communication and (non-)discrimination in practice (see also Section 4.1.3).

The interconnection with (non-)discrimination

The interconnection with (non-)discrimination in practice is clearly reflected in Radio Free Europe/Radio Liberty's *Standards of Ethical Journalism*, which state: "We consider hate speech to include slurs based on religion, race, ethnicity, national origin, culture, sexual orientation, gender identity, or disability, as well as other forms of offensive references that are intended to set one group against another." (Pos. 244) In addition, some codes provide extended definitions of hate speech that encompass further factors such as age, body weight, immigration status, socio-economic background, or pregnancy (e.g., Snapchat's *Community Guidelines*, Pos. 202).

4.1.3 Sensitive Issues versus Inclusivity (THEME 3)

Theme 3 addresses the challenge of balancing sensitive issues in public communication with the ethical principle of inclusivity. Our analysis of ethical codes and guidelines focused on identifying how the representation of minority voices is articulated in the texts, as well as how they acknowledge the limits of freedom of expression in light of others' sensitivities.

Almost three-fifths of the analysed codes (59.0%) include references to Theme 3 – either in terms of inclusivity or related sensitive topics. These references often involve respectful approaches to the age-appropriate portrayal of marginalised, vulnerable, or disenfranchised groups, and to the avoidance of (non-)stigmatisation. The groups addressed most frequently include children and minors, elderly individuals, LGBTIQ+ persons, linguistic minorities, and people with disabilities (see also Sections 4.3.1 and 4.3.2).

Overall, Theme 3 is strongly interlinked with questions of responsibility (Theme 2) and ethical concerns regarding the protection and self-determination of children and minors (Theme 6).

Some illustrative examples were found in the following cases:

Disclosure of sensitive information

The Slovenian Association of Journalists, in cooperation with the Honorary Court of Journalists and the Slovenian LGBTIQ+ organisation Legebitra, issued *Recommendations on the Disclosure of Non-Normative Sexual Orientations, Gender Identities, and Gender Characteristics in the Media*. These recommendations highlight the sensitivity surrounding gender identity, sexual orientation, and related characteristics, and stress the importance of obtaining informed consent prior to any disclosure.

Crime reporting

Another sensitive issue identified in several national and international codes and guidelines concerns the moral dilemmas associated with crime reporting. These include questions around the (non-)disclosure of a suspect's or victim's nationality, ethnicity, or origin (e.g., *Publishing Guidelines* of the SRF – Swiss Radio and Television; *Code of Ethics in Providing Information to the Public* by the Lithuanian Public Information Ethics Association). The Dutch television programme "Nieuwsuur" addresses the ethical responsibility toward both suspects and victims in its *Journalism Code*, stating on the one hand: "The identity of crime suspects is protected as much as possible" (Pos. 56), while on the other hand acknowledging: "We are aware of the consequences of media coverage for children and victims of crime or accidents – and their relatives – in particular. For each event, the importance of disclosure must be carefully weighed against the possible disadvantages for those involved" (Pos. 52).

Notably, this dilemma is not limited to journalism. It is also reflected in institutional documents such as the *Handbook on Internal and External Communication* issued by the

Finnish Police Board, and the (non-public) Communication Guidelines of the Austrian Federal Ministry of the Interior (BMI) and the Federal Police in Austria.

4.1.4 Loyalty versus Public Interest (THEME 4)

Theme 4 captures the moral tension between the various duties of loyalty held by professional or organisational actors and the public's right to know – for example, in the context of whistleblowing. As one of the most frequently occurring and multidimensional themes, Theme 4 appears in 56.6% of the analysed documents. References in these documents relate either to issues of loyalty or to concerns regarding the public interest; however, how this balance is framed varies significantly across professional contexts.

The term loyalty itself was not well-suited for automated coding, as it was rarely mentioned explicitly and required manual interpretation. Moreover, its meaning may vary depending on the researcher's disciplinary background. To address this, our study applied an inductive coding approach to uncover the diverse set of shared values among professionals engaged in public communication (e.g., impartiality), as well as their affiliations – whether organisational or public – interpreted here as forms of loyalty obligations (see also Section 4.2.3).

Automated text search

An additional automated text-search and auto-coding procedure identified 33 codes and guidelines issued by various public communication actors (7.7%), with at least one example per country addressing the issue of "whistle/blowing". The importance of this topic is exemplified in the *Code of Conduct* published by Oštro, a centre for investigative journalism in the Adriatic region. The code states that the non-profit organisation "is aware of the advantages as well as the pitfalls of the digital environment, and therefore enables sources – provided they follow the safety instructions – to submit information in the public interest safely and anonymously via its portal Žvižgač.si (whistleblower)" (Pos. 24). Furthermore, 117 documents (27.3%) include an explicit reference to the concept of the "public interest", demonstrating that this aspect of the dilemma can also be captured through direct linguistic cues.

4.1.5 Truth-telling versus Confidentiality (THEME 5)

Theme 5 explores the prevalence of ethical considerations related to truth-telling and evidence-seeking, and the conflicting imperatives of protecting confidentiality and privacy – for example, the need to safeguard journalistic sources and uphold personal data protection. This ethical dilemma represents a fundamental concern in journalism and professional communication ethics. The *Reporters Without Borders Ethics Charter* highlights this delicate balance through a set of key principles. On the one hand, journalists are obligated to "respect the truth regardless of the consequence to oneself, because of the public's right to know the truth." On the other hand, privacy and confidentiality are equally essential. The charter emphasises the duty to protect privacy and "not to disclose the source of information obtained confidentially" (Pos. 24–27). Similarly, the *Ethical Code of the National Association of Hungarian Journalists* reinforces the importance of both accuracy and privacy in journalistic work: "Nor can information competition justify the publication of unverified, untruthful or private information unrelated to public life, thereby infringing the privacy rights of the person concerned." (Pos. 41) Although only a few ethical codes and guidelines explicitly address the tension between truthfulness and confidentiality as a dilemma, more than four-fifths (81.4%) of the analysed documents contain distinct references to either truth or confidentiality. This made it the most frequently applied marker in the coding process.

Automated text search

To validate our results and ensure the quality of the assessment, we employed an automated text-search procedure. This process identified references to Theme 5 in approximately one-third of all codes and guidelines. Specifically, the term "truth" appeared in 32.4% of the analysed documents, while "honest/y" was found in 33.1%. References to "confidential/ity" (44.5%) and "objectiv/ity" (48%) occurred even more frequently, underscoring both the prevalence and the multidimensional complexity of Theme 5.

A high level of co-occurrence among these terms was revealed through MAXQDA's Complex Coding Query function. Theme 5 proved to be particularly significant for journalistic actors, given that truth-telling and evidence-seeking are fundamental principles of journalistic integrity. For instance, the *UAB All Media Lithuania Code of Ethics* states: "The essential feature of ethical journalism is the truthfulness and integrity of the information and opinions published." (Pos. 24)

Further examples underscore the importance of truth-telling and evidence-seeking as core elements of ethical journalism:

Fact-checking

Fact-checking initiatives play a crucial role in reinforcing the principle of truth-telling and evidence-seeking by systematically verifying the accuracy of claims made in media, politics, and corporate communication. In Austria, initiatives such as FAKTIV (*General Terms and Conditions for the Use of the Online Services of Profil Redaktion GmbH*, Pos. 5: "We check statements for their truthfulness.") and Mimikama (*The Four Pillars of Mimikama*, Pos. 6: "Fact checks are our weapon against disinformation – they ensure transparency and emphasise the truth.") are dedicated to assessing public statements, debunking misinformation, and promoting fact-based discourse.

False or misleading narratives

The *Standards of Ethical Journalism* issued by Radio Free Europe/Radio Liberty stress that patriotism must never take precedence over honest reporting. Journalists are expected to challenge false or misleading historical and nationalistic narratives, even when they are deeply rooted in public perception: "Objectivity and accuracy require challenging false patriotic narratives and their premises and reporting the truth as it is." (Pos. 345)

Truthfulness is also of central importance for actors in advertising and public relations, as it directly affects credibility, consumer trust, and ethical responsibility. A clear example can be found in the *Four Principles for the Use of Generative AI in PR* issued by the Austrian Ethics Council for Public Relations: "The current guideline focuses on topics that must always play a role in professional communication: transparency, truthfulness, handling of sensitive (customer) data, and bias awareness. Through the use of generative AI, these principles take on a new significance." (Pos. 13–16)

Artificial intelligence

Artificial intelligence – ranging from basic automation to advanced analytical and generative models – has introduced a fundamental shift in truth-seeking processes, as addressed in Reporters Without Borders' *Paris Charter on AI and Journalism*. AI's ability to analyse vast datasets, detect patterns, and generate content has enhanced fact-checking and investigative journalism. At the same time, it raises serious concerns about misinformation, deepfakes, and algorithmic bias. This dual potential underscores AI's

unprecedented role in shaping how truth is discovered, verified, and communicated in the digital age. The Swiss Press Council succinctly captures this challenge in its *Artificial Intelligence Guidelines*: "Journalism, with or without AI, requires the search for truth and the correct treatment of sources." (Pos. 8)

4.1.6 Child Protection versus Self-determination (THEME 6)

Theme 6 addresses the moral tensions and ethical issues that arise between the normative value of protecting children and minors in the context of public communication and their right to informational self-determination – particularly the child's right to freedom of expression, including the right to receive and impart information. Fewer than one-third of the analysed documents (31%) explicitly addressed issues related to the protection of children and minors. However, this ethical and legal concern is prominently reflected in the policies of most VLOPs and VLOSEs, including YouTube, Snapchat, and TikTok. The majority of relevant codes focus on age restrictions and safeguarding minors from harm, as exemplified in the *Benchmarks for Responsible Journalism: A Practical Guide from the Swiss Press Council*, which states: "Children's interests call for special protection" (Pos. 1386).

The sample included several illustrative documents that directly address this theme, such as the Finnish *Ethical Guidelines Regarding Children and Young People in YLE Content*, UNICEF's *Ethical Reporting Guidelines (Key Principles for Responsible Reporting on Children and Young People)*, and the *Code of Conduct for Children and Young People's Programmes* by RTV Slovenia. Only a few codes explicitly emphasise the need for the inclusion and participation of children and youth. One notable exception is the UNHCR handbook *Using Social Media in Community-Based Protection*, which calls for inclusive approaches both online and offline: "At-risk groups, such as minorities, people with disabilities and people with diverse sexual orientations and gender identities, as well as under-represented groups such as adolescents, youth and older people, must all be included [online and offline]." (Pos. 161)

Children as integral members of society

As highlighted in the *Guidelines for Journalistic Ethics and Quality Journalism* issued by Radio ORANGE 94.0 – Community Radio Association Vienna, media outlets are expected to place a high value on children and young people, recognising them as integral members of society. These outlets are encouraged to create content that is not only engaging and

educational, but also upholds the welfare, dignity, and rights of children and youth (see also Section 4.3.3).

4.1.7 Manipulation versus Political Free Speech (THEME 7)

Theme 7 concerns the blurred and often conflicting boundaries between the right to freedom of political expression – which may also encompass manipulative (though not illegal) and populist forms of communication – and the democratic right to vote and make informed decisions based on undistorted, accurate information. A strong example illustrating the tension between these conflicting rights is found in the UNHCR handbook *Using Social Media in Community-Based Protection*, which states: "Malicious actors using Social Media in a legal way to violate PoCs' [people of concern] rights, for example with scams or manipulation to get them to disclose their personal information; political propaganda used to fuel conflict; Malicious actors using illegal means such as malware infection, system compromise and social engineering attacks to harm persons of concern." (Pos. 51)

The X Rules

The social media platform X (formerly known as Twitter) – which plays a particularly influential role as a space for political speech – has embedded a Civic Integrity Policy within *The X Rules*. This policy states that users "may not use X's services for the purpose of manipulating or interfering in elections or other civic processes, such as posting or sharing content that may suppress participation, mislead people about when, where, or how to participate in a civic process, or lead to offline violence during an election. Any attempt to undermine the integrity of civic participation undermines our core tenets of freedom of expression and as a result, we will apply labels to violative posts informing users that the content is misleading." (Pos. 688)

Despite its relevance, Theme 7 was identified in comparatively few analysed codes and guidelines – appearing in less than one-third of the cases (30.5%). Nonetheless, several noteworthy references were found. For example, the *Standards of Ethical Journalism* of Radio Free Europe/Radio Liberty explicitly address the risks associated with politically motivated disinformation: "We do not use state-run or government-controlled news agencies as either a first or second source of news about other countries, as they may be used as channels for disinformation." (Pos. 501) Political independence emerged as a cross-cutting issue, closely

linked to Theme 7 and frequently intertwined with broader concerns related to professional autonomy (see Section 4.2.4) and responsibility (see Section 4.2.5).

Automated text search

The results of the automated text search further highlight the complexity and thematic breadth of Theme 7, particularly in relation to political communication. Keywords such as "politic/al", "manipula/tion", "marginali/sation", "polari/sation", "propaga/nda", and "populis/m" were used to assess semantic proximity to the theme. While more than half (59.2%) of all codes contained references to "politic/al" matters in a broad sense, these references do not necessarily qualify as part of Theme 7.

Manipulation

17.0% of the documents address "manipula/tion", particularly in connection with AI. Examples include AI-generated content (e.g., *AI Guidelines* by the Austrian Press Agency APA), manipulated photo material (e.g., *Code of Ethics of Estonian Press Photographers*), and algorithmic influence through ranking or reputation systems (e.g., Bing's *Microsoft Community Code of Conduct*).

Marginalisation

The term "marginali/sation" appears in around 4.7% of the documents, but the related passages are more closely linked to Theme 3 (inclusion and sensitivity) and to accountability mechanisms, rather than to political conflict in the context of Theme 7. This is supported by a high level of co-occurrence with Theme 3 and a medium level with inclusion-related accountability (see also Section 4.3.1).

Polarisation

Only a small number of documents (1.6%) explicitly mention "polari/sation". Notably, this term is predominantly used by public institutions, such as the Finnish Prime Minister's Office, which acknowledges the increasing fragmentation of the information environment: "The way media is consumed and the way information is interpreted have become fragmented, while the target groups for communications have become more diverse. The fragmentation of information environments has been fuelled by the accelerating polarisation of society. Due to these changes in the operating environment, central government communications must continue to become more target group-focused and interactive. In addition to traditional press releases, multi-channel

communication is needed to tailor content for different audiences." (*Openness and Timeliness: Government Communication Guidelines*, Pos. 9)

Propaganda and populism

The term "propaga/nda" appears in 8.6% of the documents and is often associated with concerns about journalistic independence. These references span a variety of national and institutional contexts. "Populis/m" was mentioned in only one document – the UNHCR handbook *Using Social Media in Community-Based Protection* – as part of a definition for manipulated content: "Genuine information or imagery that has been distorted, e.g. a sensational headline or populist 'click bait'." (Pos. 230)

4.1.8 Open coding of other themes and topics of moral disagreement (THEME 8)

While the preceding sections presented the results of a deductive coding procedure based on pre-defined variables, the following sub-section explores additional moral dilemmas in public communication identified through inductive open coding. This approach expands the analytical scope beyond the key Themes 1 to 7.

The ethical use of digital technology emerges as a dynamic and evolving challenge, requiring codes and guidelines to continuously adapt to new developments. As stated in the A1 Telekom Austria Group *Code of Conduct*: "The digital world is not going to wait for us to be ready for it." (Pos. 87) This concern is central to contemporary public discourse and is increasingly acknowledged at a meta-level across various national and international codes and guidelines.

Key areas of concern identified through open coding include:

Intellectual property rights

A careful balance must be maintained between protecting intellectual property rights and ensuring public access to knowledge. This makes issues such as open access, copyright, and plagiarism central ethical concerns in public communication.

Media diversity

As online platforms increasingly shape public discourse, media pluralism becomes essential to guarantee the representation of diverse perspectives. At the same time,

> these platforms must address the growing challenges of misinformation and biased or manipulative narratives.
>
> *Humour and provocative content*
>
> The ethical use of humour and provocative content warrants critical reflection – particularly when irony, sarcasm, or hoaxes are involved. These forms of expression can blur the boundaries between legitimate satire and potentially harmful or misleading content.

Interestingly, only a small proportion of the analysed documents (14.7% of the total sample) explicitly address AI and its implications – approximately one-third of these were issued by journalistic actors. Nevertheless, AI plays a significant role across various domains of public communication, particularly in relation to truthfulness, fact-checking, ethical journalism, and the responsible dissemination of information. Notably, many documents that mention AI do not engage with its potential risks or the broader ethical dilemmas it poses within the media context. Although AI was not explicitly included as a coding marker in this analysis, its influence was apparent in several ethical codes. Given that AI introduces new ethical challenges – such as algorithmic bias, deepfakes, and the automated spread of misinformation – some documents made indirect reference to these concerns. Many codes implicitly acknowledge the impact of AI by emphasising core principles such as accuracy, transparency, and integrity in digital communication (see also Sections 4.1.5 and 4.3.3).

4.2 Principles of dialogic communication ethics

The second stage of this qualitative study aimed to identify those documents within our sample that offered deeper insights into dialogic communication ethics – the key theme of the DIACOMET project. To this end, we implemented a rigorous process of sorting and selecting all ethical codes and guidelines that contained explicit references to various dimensions of dialogic communication. This section focuses on the normative principles of dialogic communication ethics as reflected in the selected documents. As outlined in Section 2.2, we distinguish between the conceptual relevance and the practical application of these principles within the context of public communication.

Our analysis reveals that references to either dialogue as a concept or dialogue as interaction were found in more than four-fifths of the documents in the sample (81.4%). In 41.9% of those 349 cases, both dialogue principles were present; in 58.1%, only one was identified.

However, this does not necessarily indicate that these documents treat dialogue as a central theme. In fact, the majority of codes and guidelines reference these principles only in passing, as illustrated in Figure 1.

The following sub-sections present our findings in more detail. Section 4.2.1 summarises results related to dialogue as a fundamental principle and its practical implementation in the analysed documents. Since these two principles served as pre-selection criteria for the subsequent analytical process, the sorting and selection procedure is briefly outlined. The following sections then present the results of our in-depth analysis of selected documents, focusing on key dimensions such as actors and agents (4.2.2), duties of loyalty (4.2.3), autonomy (4.2.4), and responsibility (4.2.5), thereby addressing **Research Question 2** (RQ2).

Figure 1: Coverage of the dialogue principles
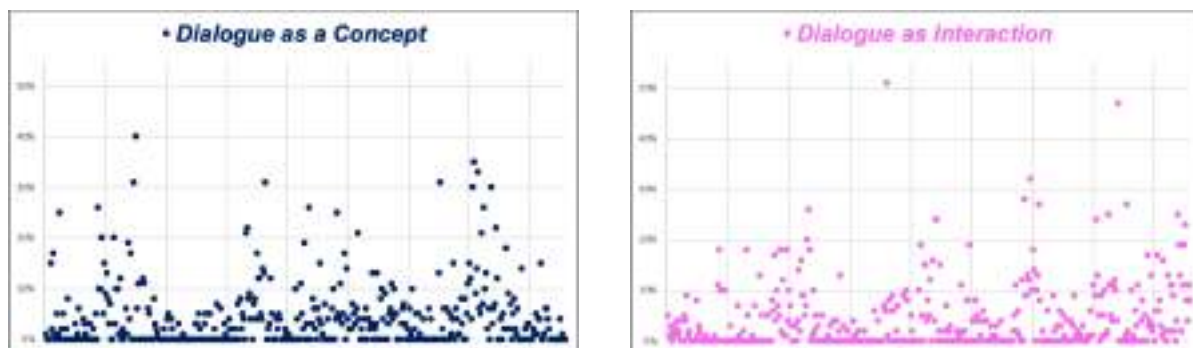
Each dot represents one document in our sample (N=429). Percentage of text passages coded as ● dialogue as a concept or ● dialogue as interaction in relation to the total text passages coded per document.

4.2.1 Dialogue as a concept and dialogue as interaction

Nearly two-thirds of all analysed documents (63.6%) mention dialogue as a fundamental principle of public communication. Notably, the concept of dialogue appears more prominently in supranational codes and guidelines than in national ones. While 60.5% of national-level documents include a reference to dialogue as a concept, this figure rises to 76.5% among supranational cases.

The word cloud in Figure 2 highlights the centrality of terms such as dialogue, discussion, participation, discourse, community, and exchange of opinions, which served as key coding units. In addition, words like social, digital, share, create, and channels frequently appeared in close contextual association with dialogue, reflecting its embeddedness in digital interaction settings.

Figure 2: Dialogue as a concept

Words that most commonly occur within the text passages coded "Principle: dialogue as a concept"

Examples of text passages coded under "dialogue as a concept" include the following:

Dialogue

"We are in dialogue with you. And love it! The Internet not only enables us to tell stories in many new ways, but also to engage in direct dialogue with you. So that Republik becomes more diverse, more interesting and more reflective with your voice." (Switzerland: Republik, *Manifest*, Pos. 19)

Exchange of ideas

"We want to enable the informed exchange of civic ideas in a way that fosters productive dialogue." (International: TikTok, *Community Guidelines*, Pos. 336)

Raising public awareness

The Royal Dutch Medical Association (KNMG) encourages doctors to use social media not only for knowledge dissemination but also for raising public health awareness and participating in dialogue with both professional peers and the general public. (*Handbook for Doctors and Social Media*, Pos. 105–109)

Nearly three-fifths of all codes and guidelines (59.7%) contain references to the practical implementation of dialogue in public communication – both in national and international documents.

The word cloud analysis (see Figure 3) underscores the close association between dialogue and communication, with key terms reflecting diverse forms of audience interaction and feedback mechanisms. Prominent among these are feedback, questions, and content. The term contact also appears frequently, often in phrases such as "reach out to us at XY", "write to XY", or "get in touch", which indicate two-way communication processes – hallmarks of dialogic interaction. Additionally, the analysis revealed references to other dialogic contexts related to accountability and responsiveness, such as the terms complaint(s) and reporting, as well as mentions of accountability platforms like Ethics Councils.

Figure 3: Dialogue as interaction

Words that most commonly occur within the text passages coded "Principle: dialogue as interaction"

Examples of text passages coded under "dialogue as interaction" include the following:

Feedback systems

"Citizens have various avenues, including the website, social media channels, the city's feedback system, and customer service points, through which they can offer feedback and seek clarification on the city's initiatives and services. Rest assured, questions and feedback are promptly addressed to the best of our abilities." (Finland: City of Helsinki, *Communication Guidelines*, Pos. 41)

Complaint systems

"Editorial boards will examine the complaints of readers, viewers, listeners, which question the principles listed in this document. The result will be disseminated and shared with the audience." (Hungary: Editor-in-Chief's Forum Hungary, *Self-Regulatory Ethical Guidelines*, Pos. 61)

> ### Contact forms
>
> "Do you come across a Nieuwscheckers post that you think is not in line with IFCN principles? Please contact us or report it to the International Fact-Checking Network (IFCN) using the complaint form provided. We will then deal with it as soon as possible." (The Netherlands: *Nieuwscheckers Guidelines*, Pos. 17)

Moreover, several market-oriented social media platforms explicitly promote dialogic interaction. TikTok, for example, aims to facilitate informed exchanges of civic ideas, as outlined in its *Community Guidelines*. Similarly, the *Facebook Community Standards* focus on reducing misinformation and fostering an environment conducive to meaningful discussion.

If either of the aforementioned principles was identified as present, the respective ethical code was included for further analysis. In total, 349 documents were selected (81.4%), while the remaining 80 documents (18.6%) were excluded from the subsequent research process. Although the two dialogue markers are conceptually interwoven, their co-occurrence with other codes proved to be relatively rare. The following sub-sections present the findings of our in-depth analysis of the normative principles of dialogic communication ethics, as reflected in the selected sub-sample of documents (n=349).

4.2.2 Actors and agents

The examination of actors and agents centres on the question of whether a given document enables and empowers the individuals it addresses to make informed judgements about their conduct, based on normative principles of deliberation. Core guiding questions include: Who is directly affected? Who participates, and who is represented? Who ought to be involved? The aim of this analysis was to identify those actors expected to engage in moral reasoning and make ethical decisions within public dialogic communication contexts. The paired term "actors/agents" is used here to encompass a broad range of roles, including citizens, journalists, and communication specialists, as well as individual representatives of specific professional groups.

Table 5 provides an overview of the frequency and percentage of sub-codes assigned to the actors and agents category across the analysed documents. The most frequently mentioned groups include employees, citizens/individual users, journalists, and media/communication professionals. Less commonly referenced categories include non-media professionals, political actors, and online communities. It is important to note that actors may hold multiple

roles, according to the coding strategy applied in this study. For instance, a professional journalist working within a newsroom may be coded both as a journalist and as an employee.

Table 5: Actors and agents

Actors and agents	Frequency	Percentage
Employee(s)	160	45.8%
Citizen(s)/Individual users	142	40.7%
Journalist(s)	129	37.0%
Media/Communication specialist(s), practitioner(s) or representative(s)	125	35.8%
Non-media representative(s)	81	23.2%
Political actor(s)	63	18.1%
(Online-)Community	62	17.8%
Others/Open (inductive) codes	92	26.4%
ANALYSED DOCUMENTS	349	100%

The table illustrates the frequency and percentage of all actors and agents (highest to lowest) addressed by the selected documents (n=349). Multiple coding was allowed.

The analysis of actors and agents is closely linked to the question of which frames of accountability are addressed by the respective documents, as these indicate, among other things, which groups of actors were significantly involved in their development. For our qualitative analysis, we relied on the same categories that were already used during the initial quantitative analysis of our corpus (see Table 2 above). However, whereas our previous analyses identified only the dominant accountability frame within each document, the qualitative study takes into account all relevant frames.

The analysis of all accountability frames reveals that multiple frames are referenced within ethical codes (see Table 6). The market frame is the most frequently cited (46.2%), followed closely by the public frame (45%). While the professional and political frames are also present, they appear less prominently. In contrast to the quantitative analysis, which identified only the dominant frame per document, these findings underscore the multi-dimensional character of accountability, indicating that ethical codes often engage with several frames concurrently. By mapping these concepts within ethical codes, the qualitative analysis offers a more nuanced understanding of how accountability is constructed across different sectors, and how professional, market, political, and public frames intersect in ethical guidelines.

Table 6: All frames of accountability

Frame of accountability	Frequency	Percentage
Market frame	198	56.7%
Public frame	193	55.3%
Professional frame	144	41.3%
Political frame	96	27.5%
ANALYSED DOCUMENTS	349	-

The table illustrates the frequency and percentage of all frames of accountability (highest to lowest) addressed by the selected documents (n=349). Multiple coding was allowed.
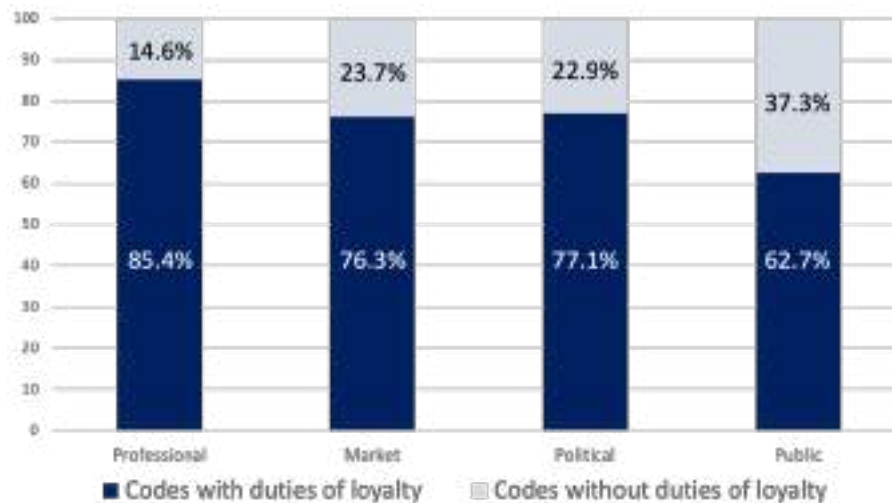
4.2.3 Duties of loyalty

The analysis in this category aimed to identify relevant references to different types of loyalty and the normative principles used to resolve or mitigate loyalty conflicts –particularly in relation to freedom of information, transparency, and professional duties. Unlike other predefined categories, duties of loyalty can manifest in a variety of ways: for example, an employee's loyalty to their organisation or profession, a journalist's commitment to the public interest, or a policymaker's responsibility to uphold democratic values.

Due to the highly context-dependent nature of these references, the codes in this category were applied inductively. Their interpretation and relevance varied significantly depending on the actors involved and the ethical frameworks in which they appeared. The inductive approach allowed for a flexible and context-sensitive coding, ensuring that loyalty was assessed in relation to the diverse obligations and expectations placed on different actors.

Notably, only about one-third of the analysed documents (32.7%) made no reference to loyalty-related aspects. By contrast, a clear majority (67.3%) contributed to a broader understanding of loyalty as an ethical category. Across all types of codes, it became evident that conflicts frequently arise from competing loyalty obligations.

A cross-analysis of the documents revealed that references to duties of loyalty were most prominent in codes rooted in the professional frame (e.g., journalism, public relations). Such references were less common – or more difficult to identify – in documents representing typical actors or institutions in the public frame (see Figure 4).

Figure 4: Duties of loyalty per frame of accountability

The figure illustrates the percentage of documents that include at least one text passage related to duties of loyalty in each frame of accountability (n=349). Multiple coding was allowed.

One of the most frequently observed patterns was loyalty to one's own profession, particularly in journalism and public relations. For example, the *ORF Editorial Statute* states: "Independence is not only the right of journalists, but also their duty." (Pos. 34). Some codes go beyond this narrow understanding by extending loyalty obligations to other professions, as in the Hungarian Public Relations Association's *Public Relations Code of Ethics*: "The public relations practitioner must respect the rules and principles of communication and other professions, insofar as these are compatible with the professional ethical standards of the public relations profession." (Pos. 64)

Loyalty towards society

The Estonian Newspaper Association highlights the societal function of journalism by stating that "one of the main obligations of journalism is to critically monitor the exercise of political and economic power in society" (*Code of Ethics of Estonian Journalism*, Pos. 1). Public institutions also express concern for their role in public communication. For instance, the City of Vienna acknowledges its evolving communicative responsibilities in light of digital transformation: "The world has changed with the internet. We also want to be a pioneer in this change. It is now a matter of utilising our existing strengths in networking customers and citizens in a digital world. It is about utilising social networks for the benefit of the company and its citizens." (*Social Media Guidelines*, Pos. 31)

> ### *Organisational loyalty*
>
> In corporate settings, loyalty is frequently directed toward the organisation itself. The *Petrol Code of Conduct* (Slovenia) illustrates this by emphasising employees' duties to uphold the company's reputation, integrity, and interests: "In everyday relations with the public, we are respectful regarding our company and we operate on the principle of maintaining the company's reputation." (Pos. 80) Such obligations typically include confidentiality, brand protection, and responsible communication – ensuring that employees act in ways that safeguard the organisation's public image and trustworthiness.

4.2.4 Autonomy

Autonomy can manifest in diverse ways depending on the context – ranging from a journalist's editorial independence to a company's operational freedom. Accordingly, our coding process examined whether a document referred to the independent and autonomous actions of the actors in question, and which normative principles were associated with the exercise of autonomy (e.g., independence, agency, etc.). In contrast to a deductive coding strategy, which may be too rigid to capture the full complexity of this concept, the inductive method enabled sensitivity to context-specific boundaries and implications. Recognising this variability was essential for accurately assessing how autonomy is valued and enacted across different communicative and institutional settings.

Most journalistic codes emphasise the importance of journalists and newsrooms remaining independent of political, economic and other external pressures (editorial and journalistic independence). Such independence is considered essential to ensuring the credibility, impartiality, and integrity of journalism. Public service media organisations, in particular, are mandated to maintain independence from external influences in order to fulfil their role of providing impartial and diverse information to the public. This commitment is articulated, for instance, in the *Code of Conduct* by the Finnish Public Service Media Company Yle: "Our content is reliable and independent [...] We support democracy and promote freedom of expression by providing opportunities for participation in social debate." (Pos. 10–11)

In addition, some documents underscore the need for journalists and editorial teams to retain autonomy in decision-making and content production, highlighting the importance of freedom to select topics, approaches, and content without coercion (autonomy in decision-making and content production). Finally, several documents stress the importance of

journalists refraining from accepting gifts, payments, or other forms of compensation that might compromise the integrity of their reporting. They also emphasise the need to avoid situations in which personal, political, or economic interests could undermine journalistic objectivity (conflicts of interest).

Integrity of reporting

The *Ethical Guidelines of the Kreatív Group* in Hungary highlight the importance of maintaining integrity in the process of information gathering. As the guidelines state: "Kreatív journalists are not allowed to 'trade' information: they cannot promise or accept financial or other benefits, nor can they give confidential information in exchange for information, as they are always acting in the interest of truthful information." (Pos. 31)

Yet other actors and agents within the broader media ecosystem – including research participants, employees, and members of organisations – also emphasise the importance of respecting individual autonomy and self-determination.

Automated text search

The results of the automated text search further underscore the strong association with journalism. The keywords "independ/ence", "autonom/y", and "self-determinat/ion" were used to assess semantic proximity to the theme.

The term "independ/ence" appears in more than half of the documents (54.5%). In the context of documents relevant to journalists as actors and agents, approximately three quarters (76.0%) included the term. The analysis also indicates that the concept of independence is closely intertwined with references to autonomy. Only a small number of codes explicitly mention "autonom/y" (10.3%) or "self-determinat/ion" (5.1%), and the association with journalistic actors and agents is not as pronounced as in the case of independence.

A collective examination of the three terms reveals that 57.1% of all dialogue-related documents can be considered relevant to the concept of autonomy.

The examination of the relevant frames of accountability indicated that text passages relating to autonomy were more prevalent in codes representing a professional frame (e.g., journalism, public relations) or a political frame (e.g., public officials, individual politicians,

and political groups). As with references to duties of loyalty, references to autonomy were less common – or more difficult to identify – within the public frame (see Figure 5).

Figure 5: Autonomy per frame of accountability
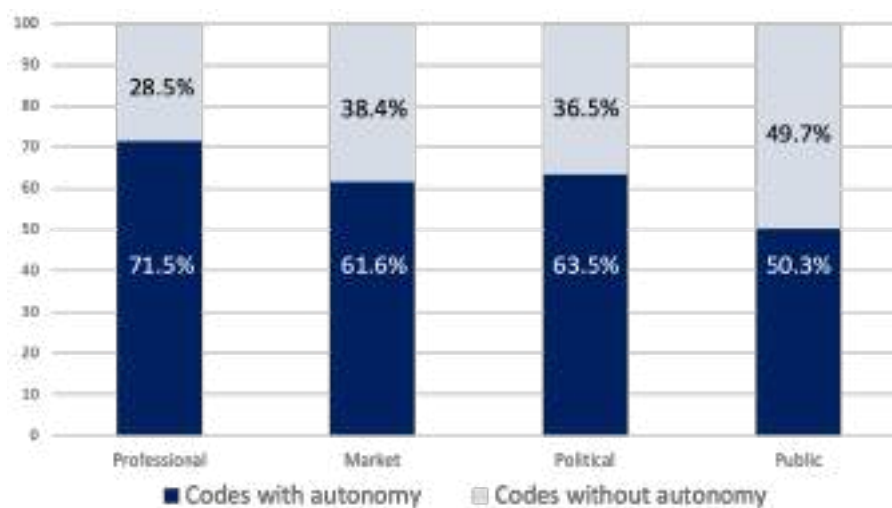
The figure illustrates the percentage of documents that include at least one text passage related to autonomy in each frame of accountability (n=349). Multiple coding was allowed.

Editorial independence

The principle of editorial independence is a recurring theme in journalistic codes of ethics, where it is closely linked to the right of journalists to make autonomous decisions based on their professional judgement. According to the non-public *Ethical Code* of Helsingin Sanomat, the newspaper emphasises its editorial independence, noting that decisions about topics and perspectives are made autonomously. These decisions rely on journalistic judgement, taking into account the importance and relevance of the subject matter, reader interest, and not the influence of external sources or stakeholders (Pos. 56). A similar emphasis is found in the *Guideline on the Principles of the Use of Artificial Intelligence* by the Dutch news agency Algemeen Nederlands Persbureau (ANP), which affirms: "No direct influence by anyone, external or internal, other than in the manner provided for in this Statute" (Pos. 7).

Political independence

Political independence, often framed as an extension of editorial autonomy, also emerges as a critical concern – particularly in documents addressing the boundaries of influence exerted by state or institutional actors (see also Section 4.1.7). Though not

confined to specific national contexts, this principle is most commonly found in journalistic and community media settings. For example, the *Charter for Community Television Austria* by DorfTV states: "Community TVs are independent of state, commercial and religious institutions and political parties in terms of ownership, organisational form, publication and programming" (Pos. 2). This principle is echoed in the *Publishing Guidelines* of the Swiss broadcaster SRF, which state: "Our journalistic work is independent when the editorial teams do not favour or spare any ideology, party, association, institution, person or other interest group. Anyone working in journalism at SRF maintains a critical distance from all groups in political, economic, cultural, scientific and social life" (Pos. 48).

Beyond media organisations, public institutions also contribute to the safeguarding of journalistic autonomy. For instance, UNESCO's *Guidelines for the Governance of Digital Platforms* advocate structural support for independent journalism: "Governance systems should also promote dialogue with media, including for the investment in independent news media, and support the media ecosystem by making data available and supporting actions to bolster media sustainability, diversity, and plurality." (Pos. 211) Likewise, the United Nations' *Our Common Agenda Policy Brief 8: Information Integrity on Digital Platforms* emphasises the importance of "a free, viable, independent and plural media landscape" (Pos. 21), alongside safeguards for journalists and the promotion of independent fact-checking initiatives.

4.2.5 Responsibility

Responsibility is an ethical umbrella term that intersects with multiple other normative concepts that vary across actors, industries, and institutional contexts. It goes beyond editorial accountability and respect for the rights of others, encompassing values such as impartiality, objectivity, truthfulness, honesty, and discretion. Given its broad and context-dependent nature – which may also include notions such as care, mindfulness, solidarity, tact, and good judgment – a strictly deductive categorisation would have been too limiting. Therefore, our coders adopted an inductive approach to determine whether and how each analysed code of ethics addressed the legal and moral responsibilities of the addressees.

The empirical study demonstrates the central importance of the concept of responsibility, which is mentioned in almost all of the documents examined – in many cases even as a

normative key category. Depending on the context of application, a wide range of normative principles are derived from it:

For example, media organisations are traditionally expected to serve the public interest by providing accurate, independent, and balanced information (*professional responsibility of journalists towards the public and society*). This includes a commitment to truth-telling, fact-checking, correcting errors, disclosing conflicts of interest, and clearly separating fact from opinion. In this way, the responsibility code is closely aligned with Theme 5 (see Section 4.1.5 above). These practices are grounded in values such as honesty, fairness, and accountability.

However, these ethical principles need to be operationalised through robust internal structures. Editorial boards, for instance, are responsible for maintaining editorial independence and content integrity. This includes establishing transparent editorial processes, implementing quality assurance mechanisms, and ensuring a clear separation between journalistic content and commercial messaging (*organisational responsibility for content and editorial independence*). Advertising and public relations professionals also contribute to the information environment and are increasingly held to standards of transparency and ethical conduct. Their role in shaping public narratives and influencing perceptions underscores the need for shared ethical commitments across communication sectors. Several codes specify that professionals are expected to avoid conflicts of interest, reject inappropriate gifts or benefits, and prevent personal beliefs from unduly influencing professional conduct. These expectations aim to uphold objectivity and foster trust in the communication process (*professional integrity*).

Public communication must avoid causing harm, particularly to vulnerable groups such as minors, and take steps to protect the safety of sources and communicators – this includes safeguarding privacy, freedom of expression, dignity, non-discrimination, and equal treatment (*responsibility for the rights and freedoms of individuals*). These obligations highlight the social consequences of communication and underscore the ethical implications of content production and dissemination.

> *The interrelation between media freedom and responsibility*
>
> The "Nieuwsuur" *Journalism Code* (Netherlands) highlights the interrelation between freedom and responsibility by stressing the boundaries of freedom of expression, making clear that freedom does not justify harm: "Freedom of expression is not freedom to offend others. Moreover, third-party opinions do not necessarily absolve the medium putting them out from its own responsibility to the public or to the law." (Pos. 83–84)

Similarly, the *Guidelines of the Press Council* in the Netherlands stress the importance of balancing press freedom with ethical responsibilities such as transparency, integrity, and accuracy: "The freedom of the press is vital. This important role comes with obligations and responsibilities. Journalism that demands full freedom is at the same time transparent about its approach and choices. [...] Proper journalism is truthful and meticulous, impartial and fair, verifiable and integer, and ethical." (Pos. 7)

Public institutions such as Article 19 play a foundational role in ensuring a stable and pluralistic media infrastructure, promoting transparency in the use of public data, and creating enabling environments for open, accountable communication. Their contributions underscore the systemic dimension of responsibility and the importance of regulatory and infrastructural support in upholding ethical standards. According to Principle 6 ("Role of the Mass Media") of Article 19's *Camden Principles on Freedom of Expression*, mass media should take proactive steps to ensure diversity in their workforce and address issues relevant to all societal groups. The principle emphasises the importance of drawing on a variety of sources and voices while maintaining high professional and ethical standards in information provision – as part of media's moral and social responsibility. Likewise, Principle 9 ("Media Responsibilities") reinforces the normative expectations placed on media institutions: "All media should, as a moral and social responsibility, play a role in combating discrimination and in promoting intercultural understanding." (Pos. 115–116)

However, the attribution of responsibility is by no means limited to professional media actors. Our analysis also points to other relevant contexts of application – such as the public sector:

Responsibilities of public sector employees

For instance, the *Ethics Council for Civil Servants* of the Estonian Ministry of Finance recognises the right of public servants to express personal opinions that may differ from institutional directives – particularly in matters related to their work. However, this right is conditioned by the expectation that civil servants exercise this freedom responsibly and in accordance with the *Civil Servant Ethical Code*. Similarly, the *Ethical Code of the Political Party Svoboda* calls on its members to uphold the core values of freedom, respect, and responsibility: "– Freedom as the cornerstone of a democratic society; – Respect as a fundamental building block of interpersonal and social relations; and – Responsibility for

> one's actions, initiatives, and choices – towards the individual, the state, and society."
> (Pos. 26–29)

Finally, responsibility also extends to media users themselves. In a digital communication environment characterised by user-generated content and decentralised information flows, individuals are increasingly recognised as actors within the broader communication ecosystem. As such, they are expected to engage responsibly with media content, to respect the rights of others, and to adhere to the norms and rules of the platforms they use.

Responsibilities of media users

As outlined in various Austrian community guidelines, users are urged to engage in respectful interactions and to treat others in the manner they would wish to be treated (e.g., *Netiquette on the Social Media Channels of the City of Vienna*). Users are personally responsible for the content they publish and ensure compliance with laws and the rights of third parties, as emphasised by the Swiss SRF, the Lithuanian BNS and Slovenian RTV (SRF's *Netiquette and User Generated Content*, *BNS Code of Ethics*, *The Standards and Rules of Communication on the Website Rtvslo.si*.

Among social media influencers, responsibility is equally emphasised: the *PING Helsinki Ethics* guidelines affirm, "I understand my responsibility as an influencer," highlighting the need to consider the audience when creating content (Pos. 8–9). The *Media Pool Influencer Handbook* further stresses that influencers are to share only reliable information and prevent the dissemination of falsehoods (Pos. 84).

In the context of institutional communication, Frontex reminds its staff that they are responsible for their online activity and that their posts must reflect EU values. It warns that online content "may affect the reputation of Frontex, as well as your own," highlighting the long-term visibility of digital footprints (*FRONTEX Guidelines for Social Media Use*, p. 3).

4.3 Principles of inclusive accountability

In addition to the concept of dialogic communication ethics, our theory-driven qualitative study also examined the prevalence of normative principles of inclusive accountability as reflected in ethical codes and guidelines. This part of the analysis places particular emphasis on the dimensions of inclusivity (Section 4.3.1), diversity (4.3.2), and resilience (4.3.3).

Together, these sub-sections aim to provide a comprehensive answer to our **third research question** (RQ3).

4.3.1 Inclusivity

The analytical focus on inclusivity aimed to identify the factors, mechanisms, and conditions that make accountability processes genuinely inclusive. This included questions such as: How are traditional concepts of inclusivity – such as the right to self-representation – reflected in the documents? The analysis mostly reflects good practice examples that support the principles of accountability, participation, and co-creation – particularly within the public frame. A closer look at the 76 documents featuring such good practices (21.8% of the 349 documents selected for our qualitative in-depth analysis) shows that these examples of inclusivity are strongly interwoven with both dialogue principles (see Section 4.2.1) and Theme 3 (4.1.3) – as well as with references to diversity (4.3.2).

The following core aspects can be identified as central to the understanding of inclusivity in this context: The analysis emphasises the necessity of representing a wide array of groups, including sexual and gender minorities, people with disabilities, older people, children and youth, and other marginalised or historically underrepresented communities (*representation and diversity*). The emphasis lies in ensuring that all voices and perspectives are acknowledged, contributing to a communication landscape that reflects societal diversity. This includes making content, platforms, and workplaces accessible, thereby promoting genuine inclusivity in both communication and organisational practices (*accessibility*). Respect, dignity, and equity emerge as central ethical values. Inclusive communication requires avoiding discrimination, stereotypes, and biases, and instead promoting a culture of tolerance, fairness, and mutual respect. For instance, community broadcasters are structured to prioritise diverse representation and inclusivity, as they are required to reflect the heterogeneity of their audience by ensuring equitable access and participation.

However, inclusivity is not merely about representation, but also about active involvement. Some codes and guidelines stress the importance of fostering inclusive collaboration, open dialogue, participatory governance, and constructive feedback among diverse stakeholders – including journalists, media organisations, audiences, and marginalised groups. A central tenet is the involvement of stakeholders and the public in decision-making processes, as reflected in this quote from the Republic of Estonia Government Office: "Government institutions involve interest groups and the public in shaping decisions that affect them to ensure the best possible quality and legitimacy of decisions" (*Good Practice of Inclusion*, p. 1).

Accessibility and responsiveness are also highlighted, with government institutions expected to offer timely and adequate responses to citizen inquiries and complaints through a variety of accessible, technology-independent communication channels. As one document by the Central Dutch Government states: "The central government ensures good accessibility for citizens who want to get in touch with it. Requests for information, complaints, etc. are responded to quickly and adequately. Citizens can choose which available channel they want to use to communicate with the government" (*Government Communication Principles*, Pos. 39–40).

In summary, core aspects of inclusivity in the coded segments revolve around ensuring equitable representation, accessibility, collaboration, non-discrimination, empowerment, and the creation of inclusive media environments.

Collaboration and participation

A noteworthy example with regards to co-creation and equal participation comes from the *Communication Rules for Social Media Users of the Public Agency SPIRIT Slovenia*, which promote shared responsibility in digital spaces: "We want to maintain the respectful, simple and understandable communication that we have within the community. Social networks are co-created by all participants." (Pos. 26) Similarly, the *Community Guidelines* of the Austrian newspaper Salzburger Nachrichten emphasise open, constructive engagement: "Your opinion is a valuable enrichment for our daily work, which is why we want to guarantee that a constructive dialogue can take place among all users." (Pos. 3)

Shared measures to foster inclusivity

UNESCO's *Guidelines for the Governance of Digital Platforms* propose a set of fair, clear, and shared measures, including: "Online moderators in all languages, including indigenous ones; [...] the promotion of critical thinking; support for gender equality; and, above all, the safeguarding and strengthening of freedom of expression, cultural diversity, and other human rights." (Pos. 66)

The European level

Serving the public accountability frame at the European level, EU Alumni highlights the importance of creating an environment in which all participants feel welcome and can engage meaningfully in discussions (*Community Guidelines*). Similarly, together.eu underscores its mission to foster democratic engagement within the European Union

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(*Code of Conduct*). *The Euronews Charter* further reinforces this perspective by stressing the need to reflect "Europe's political, social and cultural realities," and adhering to the principles of "impartiality and pluralism." (Pos. 68)

4.3.2 Diversity

Given the complexity and multifaceted nature of diversity as a normative principle, our analysis distinguished between two interrelated dimensions: (1) diversity in the content of communication, and (2) diversity in the process of content production. Overall, most of the analysed documents (72.2%) addressed diversity – either by referring to content-related ethical standards or by including organisational and procedural diversity measures within the accountability framework. The detailed findings for each of these two dimensions are presented separately in the following sub-sections.

Content diversity

The analysis of content-related aspects of diversity required the application of three distinct sub-codes. These were used to code text passages that addressed: (1) *linguistic diversity* – referring to the use of multiple and inclusive languages; (2) *cultural diversity* – referring to the representation of minority views and inclusiveness, with particular attention to cultural variation; and (3) *societal diversity* – referring to broader societal representation and the inclusion of multiple perspectives.

Table 7 presents the distribution of these content diversity aspects across all documents in the sample, as well as disaggregated results for international and national documents. In total, roughly one-third (37.0%) of the analysed documents contained references to content-related diversity. The share was notably higher among international documents (45.3%), compared to national ones (34.7%). Among the three sub-codes, linguistic diversity was the most frequently coded aspect overall (25.8%). It appeared more often in international documents (29.3%) than in national ones (24.8%). While societal diversity was the second most frequently coded category within national documents, cultural diversity ranked second in the international subset.

Table 7: Content-related aspects of diversity

	All documents		International		National	
	Frequency	*Percentage*	*Frequency*	*Percentage*	*Frequency*	*Percentage*
Linguistic diversity	90	25.8%	22	29.3%	68	24.8%
Societal diversity	68	19.5%	16	21.3%	52	19.0%
Cultural diversity	43	12.3%	21	28.0%	22	8.0%
GOOD PRACTICE	31	8.9%	13	17.3%	18	6.6%
DOCUMENTS with code(s)	129	37.0%	34	45.3%	95	34.7%
DOCUMENTS without code(s)	220	63.0%	41	54.7%	179	65.3%
ANALYSED DOCUMENTS	349	100%	75	100%	274	100%

The table presents the number and percentage of documents in the sample (n=349) that address content-related aspects of diversity, listed in descending order of frequency. Multiple coding was allowed.

All project partners were able to identify at least one text passage that emphasised the use of gender-neutral language, the provision of content in multiple language versions, or reflected the linguistic diversity of the media's target audience and marginalised groups.

Sensitive use of language

In its *Publishing Guidelines*, Switzerland's SRF expresses a clear commitment to the sensitive use of language, especially in relation to identity-specific reporting: "To the sensitive use of language, particularly when reporting on groups with specific identities (e.g. transgender people)." (Pos. 594) The guidelines further emphasise the broadcaster's integrative role in a multilingual society: "It strives to promote understanding, cohesion, and exchange between the different parts of the country, language communities, cultures, religions, and social groups, and takes into account the special features of the country and the needs of the cantons." (Pos. 833)

Accessibility

A key focus of many diversity-related documents is on ensuring that information is accessible and understandable to all segments of the population, including those with language barriers, limited literacy, or limited access to digital communication. As noted by the National Coordinator for Security and Counterterrorism & Ministry of Health, Welfare and Sport, "mass communication gets us far. But in practice, reaching everyone in the Netherlands quickly and properly is a major challenge" due to differences in education, language proficiency, or cultural background. These groups – referred to as

"specific target groups" – often require tailored communication strategies and customisation (*Guide for Risk and Crisis Communication for Specific Target Groups*, Pos. 8). The document stresses that "we need to be aware of people we do not always reach sufficiently with regular mass communication" (Pos. 24).

Linguistic minorities

The Council of RTV Slovenia advocates the inclusion of linguistic minorities in mainstream programming. Specifically, it supports contributions from "authors of the Italian and Hungarian indigenous minority in their mother tongue with Slovenian sub-titles in the main news programmes at least occasionally" (*The Professional Standards and Principles of Journalistic Ethics in the Programmes of RTV Slovenia*, Pos. 175).

Avoiding stereotypes and discriminatory language is another critical element. For instance, "De Volkskrant strives for equality in its use of language and avoids stigmatising words and images", recognising that the meaning of concepts evolves and may unintentionally exclude or stereotype individuals. As a result, the newspaper continuously adapts its language use (*Volkskrant Protocol*, Pos. 99–100).

By contrast, content-related aspects of cultural and societal diversity received comparatively little attention within the analysed codes and guidelines. Notably, only a single document – from Estonia – explicitly referenced cultural diversity. However, this reference appears in a macro-level document: the Estonian Broadcasting Council's *Principles of Impartiality and Balance of the Public Service Broadcasting Programme* which addresses the journalistic profession as a whole. This document underlines that content diversity in programming serves multiple social and cultural functions, ensuring balanced media content that reflects the diverse informational needs of audiences. The principle aims to support a broad spectrum of perspectives and interests through the use of varied formats and editorial approaches (Pos. 4).

Representation of older people

The Austrian Advertising Council's *Code of Ethics for the Advertising Industry* includes a dedicated section on the responsibility of advertisers to portray older individuals with dignity and respect. This focus reflects the significant influence that media representations of ageing have on societal perceptions of older people. The code

explicitly warns against discriminatory depictions, particularly where age and gender biases intersect.

This concern is also recognised by the Slovenian Association of Journalists, which issued *Recommendations for More Appropriate Reporting on the Elderly Population* to encourage respectful and accurate coverage of ageing-related topics.

Community broadcasters

A strong example of the integration of cultural and societal diversity is found in the work of public-oriented community broadcasters in Austria, including the Association of Austrian Community Broadcasters, Radio ORANGE 94.0, DorfTV, and Okto. These broadcasters prioritise inclusive representation, as their mandates require them to reflect the demographic and cultural heterogeneity of their audiences and to ensure equitable access to information across all societal groups. As stated in the *Charter of Community Broadcasting Austria*: "They [community broadcasters] invite the population to actively participate, reflect the social, cultural and linguistic diversity of their coverage areas, and promote dialogue." (Pos. 8)

It is worth noting that some documents address cultural differences and aspects of social diversity – including ethnic background, gender and sex, disability status, religious affiliation, and age. However, if these references were not directly related to the content of communication, they were analysed in the context of organisational or procedural measures and mechanisms.

Organisational/procedural diversity

The category of organisational and procedural diversity examines whether ethical codes and guidelines contain provisions that ensure the participation of multiple actors in the process of content production or in the implementation of accountability mechanisms. This includes explicit references to non-discrimination in action and the inclusion of diverse stakeholders in accountability processes and structures.

In our sample, 59.3% of the analysed documents addressed aspects of organisational or procedural diversity (see Table 8), with a notably higher proportion among international documents (78.7%) compared to national documents (54%). Among the sub-codes, non-discrimination in action was the most frequently coded aspect, appearing in 54.7% of all documents. By contrast, references to inclusion in accountability actions and mechanisms

were found in fewer than a quarter of the codes and guidelines overall – though more frequently in international documents (44.0%) than in national ones (16.8%).

Table 8: Organisational/procedural aspects of diversity

	All documents		International		National	
	Frequency	*Percentage*	*Frequency*	*Percentage*	*Frequency*	*Percentage*
(Non-)discrimination in action	191	54.7%	53	70.7%	138	50.4%
Inclusion in accountability actions and mechanisms	79	22.6%	33	44.0%	46	16.8%
GOOD PRACTICE	41	11.7%	18	24.0%	23	8.4%
DOCUMENTS with code(s)	207	59.3%	59	78.7%	148	54.0%
DOCUMENTS without code(s)	142	40.7%	16	21.3%	126	46.0%
ANALYSED DOCUMENTS	349	100%	75	100%	274	100%

The table presents the number and percentage of documents in the sample (n=349) that address organisational/procedural aspects of diversity, listed in descending order of frequency. Multiple coding was allowed.

It is worth noting that market-oriented codes targeting media users often include non-discrimination provisions, though these are typically framed in relation to prohibited content, such as hate speech. In this context, diversity is frequently addressed through restrictions rather than proactive inclusion strategies. All VLOPs and VLOSEs include explicit statements addressing (non-)discrimination based on grounds such as ethnicity, race, nationality, gender, gender identity, religion, sexual orientation, age, or disability.

Automated text search

To validate our results and ensure the quality of the assessment, we employed an automated text-search procedure for the term "discriminat/ion". 44.5% of all codes (N=429) contained references to "discrimination", with a similar proportion for the dialogue-related codes and guidelines only (45.8%). While approximately 41.6% of the further analysed national codes analysed explicitly mentioned the term "discrimination", the proportion for the international cases is even higher (61.3%). This finding is in line with both the qualitative coding results and the higher level of inclusion of non-discrimination in international cases.

The analysis also reveals several examples of inclusion in accountability mechanisms at both national and international levels:

Artificial intelligence

The Finnish case of YLE illustrates the growing importance of addressing representation in content production, particularly in light of the ethical dynamics introduced by artificial intelligence. As outlined in YLE's *Principles for Responsible AI*: "It is important to Yle that the diversity of people, cultures and society at large is reflected in the development of AI. Therefore, the data and material we use to train AI needs to be such that it enriches our understanding of society and does not reinforce stereotypes." (Pos. 4) This example underscores the need for diversity-aware data practices and highlights the role of public service media in shaping inclusive AI applications within content creation processes.

Digital change

The European Commission outlines key action areas to prevent social exclusion in the context of digital change by addressing digital connectivity, media literacy, fair working conditions, and accessibility. The *European Digital Rights and Principles* emphasise: "The declaration proposes rights in a number of key areas to ensure that nobody is left behind by the digital transformation, making sure that we take extra effort to include elderly people, people living in rural areas, persons with disabilities, and marginalised, vulnerable or disenfranchised people." (see also Section 4.3.3)

People with disabilities

The inclusion of persons with disabilities in content creation and decision-making is an important practice for authentic representation and structural inclusion. This is reflected in various national initiatives, such as: andererseits's *Editorial Guidelines* in Austria, which promotes co-authorship, awareness-raising, and inclusive editorial practices; the *Recommendation on the Portrayal of People with Disabilities in the Media* by the Austrian Federal Chancellery; and the *Professional Standards and Principles of Journalistic Ethics in the Programmes of RTV Slovenia*, which state: "People with disabilities have to be able to access the premises and studios where the programme is being produced and should be presented in the programme as they would wish." (Pos. 539) At the European level, the European Disability Forum (EDF) promotes communication that is as accessible as possible and explicitly advocates for amplifying the voices of persons with disabilities (*EDF Social Media Policy*).

4.3.3 Resilience

Resilience is not a one-size-fits-all concept. Rather, it encompasses a range of references related to empowering and motivating individuals and citizens to engage in dialogue (*empowerment*), as well as establishing a safe and secure environment conducive to open public communication (*safety and security*). An inductive coding process was employed to assess how resilience is addressed in the documents – tailored to the specific challenges, roles, and expectations of various actors. This approach also accounts for variations in how individuals and institutions adapt to and recover from adversity within communicative contexts.

Table 9 presents the distribution of these aspects of resilience across different actors and agents. More detailed findings are discussed in the following sub-sections.

Table 9: Aspects of resilience per actors and agents

Actors and agents	Empowerment		Safety and security		Total	
	Frequency	*Percentage*	*Frequency*	*Percentage*	*Frequency*	*Percentage*
Employee(s)	80	50.0%	64	40.0%	160	45.8%
Citizen(s)/Individual users	73	51.4%	82	57.7%	142	40.7%
Journalist(s)	59	45.7%	40	31.0%	129	37.0%
Media/Communication specialist(s), practitioner(s) or representative(s)	60	48.0%	45	36.0%	125	35.8%
Non-media representative(s)	33	40.7%	32	39.5%	81	23.2%
Political actor(s)	33	52.4%	27	42.9%	63	18.1%
(Online-)Community	40	64.5%	47	75.8%	62	17.8%
Others/Open (inductive) codes	53	57.6%	51	55.4%	92	26.4%
ANALYSED DOCUMENTS	-	-	-	-	349	100%

The table presents the number and percentage of documents in the sample (n=349) that address aspects of resilience in relation to the specified actors and agents, listed in descending order of frequency. Multiple coding was allowed.

Empowerment

Empowerment is regarded as a core component of resilience, particularly through the promotion of media literacy. This sub-dimension was found in almost half (46.7%) of all documents analysed and often co-occurred with references to dialogue as a concept (see Section 4.2.1) and to safety and security in public communication (see below). Notably, references to empowerment were found more frequently in codes and guidelines for

citizen(s)/individual users (51.4%) and of those addressing (online-)communities (64.5%). On the other hand, they were less common – or were more difficult to identify – in those documents addressing (non-)media actors and journalists (see Table 9).

According to UNESCO's *Guidelines for the Governance of Digital Platforms*, platforms should "[p]romote media and information literacy to enhance positive engagement with the platforms and develop online safety skills, including in digital spaces, with the aim of empowering users, in particular groups in situations of vulnerability and marginalization." (Pos. 160) Empowerment includes raising awareness about fundamental rights such as freedom of expression, privacy, equality, and access to justice, and emphasises the role of civil society, libraries, academic institutions, and information access providers in this process. For example, the City of Vienna's *Guidelines for Digital Child and Youth Work* highlight the city's commitment to digital empowerment by promoting critical engagement, equal access to digital tools, and discussions around "digital well-being" – particularly for children and adolescents (Pos. 3). Transparency in algorithmic and artificial intelligence systems is also framed as an empowerment mechanism. The European Commission notes that users "should be empowered to make their own, informed choices online", especially when interacting with AI, and stresses the need for "human-centric, trustworthy and ethical artificial intelligence systems, which are used in line with EU values" (*European Digital Rights and Principles* by the European Commission, Pos. 34–35).

Moreover, several journalistic actors recognise the value of involving citizens in media discourse – whether through constructive journalism, user-generated content, or interactive discussions. For example, RTV Slovenia actively promotes audience engagement in its *Guidelines for Social Media and Digital Platform Use*, encouraging journalists to involve diverse publics across its programmes and digital platforms. Similarly, Helsingin Sanomat (Finland) stresses the role of constructive debate in fostering social progress. The *Commenting and Writing Guidelines* encourage readers to participate through comments and opinion pieces, with selected contributions even featured in the print edition. But public institutions also take empowerment into account. For example, the Chancellery of the Estonian Parliament emphasises that coordinated public communication plays a key role in increasing citizens' knowledge of parliamentary processes and expanding their opportunities to participate in decision-making (*Code of Conduct of Public Communication*, Pos. 2).

Inclusive language and participatory values

The EU Alumni *Community Guidelines* provide a strong example of empowerment through inclusive language and participatory values: "It is crucial for us to create an environment where all alumni and visitors of our Online Community feel welcome and enjoy the discussions. It is of the utmost importance for us to provide an open, welcoming, trusting and safe experience, free of harassment and hate speech for everyone, regardless of their identity, belief, origin, appearance, class or abilities. We very much encourage you to express different views and opinions, but please do so with full respect to the other members, with transparent intentions, and in appropriate language. We do not tolerate any behaviour that could be perceived as offensive." (Pos. 4)

A positive lens

A unique case comes from Žinių Radijas (Lithuania), where empowerment is framed through a positive and developmental lens. According to the *Newsroom Policy*: "In pursuit of our vision, we will focus on seeking positivity. We will create a multimedia platform where even the gloomiest news is presented by finding the bright side. This will contribute to the understanding that society's, as well as an individual's development, occurs through mistakes. We believe this will contribute to the creation of a future-looking, believing, courageous, and prosperous Lithuania." (Pos. 3–4)

Safety and security of individuals in public communication

In parallel, resilience in communication requires a robust safety and security framework. This includes establishing clear and enforceable community guidelines (e.g., content moderation policies), which create a safer environment for expression. Digital safety threats – such as misinformation, online harassment, or surveillance – can significantly discourage individuals from participating in public discourse. Therefore, ensuring secure communication environments and protecting participants from digital intrusions were recurring themes in the analysed documents. Another important aspect is the importance of secure data management, restricted data sharing, and respect for user consent. The *LNK Code of Conduct* (Lithuania) provides a detailed example, outlining comprehensive cybersecurity policies and physical safeguards to ensure data confidentiality. Such protective measures are seen as essential for fostering open and meaningful dialogue, reinforcing democratic engagement, and increasing trust in public communication platforms (see also Section 4.2.5). Two fifth of all codes and guidelines analysed (42.4%) contain references to the safety and security of

individuals in public communication – again, relevant passages were more likely to be found in documents aimed at citizen(s)/individual users (57.7%) and (online-)communities (75.8%), and were less common in codes addressing journalists or other (non-)media actors (see Table 9).

Resilience is often reinforced by equipping users with the tools and features necessary to recognise, flag, and report misinformation or harmful content. For example, TikTok's *Community Guidelines* emphasise user autonomy, noting: "We want to make sure you have the right information to help you manage your experience [...] Our safety toolkit helps you to filter out any content [...] We also offer account controls and in-app features with safety resources" (TikTok Community Guidelines, Pos. 14). This is further exemplified by the *Ethics Guidelines for Trustworthy AI* by the European Commission which identify several key risks associated with artificial intelligence – including threats to privacy, autonomy, and non-discrimination – that must be addressed to ensure the ethical and responsible use of AI in public communication.

Fundamental rights and freedoms in the digital age

A particularly strong example of resilience-oriented practice comes from epicenter.works, a civil society organisation based in Austria committed to shaping digital policy through public participation. In its *Vision Statement*, the organisation underscores the importance of safeguarding fundamental rights and freedoms in the digital age, recognising the profound impact of technology on both individual lives and social structures. Through advocacy for privacy, opposition to excessive surveillance, and promotion of informed digital discourse, epicenter.works seeks to empower civil society and fortify democratic processes. As expressed in the organisation's statement: "It depends on all of us to decide whether these changes [i.e. technology changing society] lead to a society with fairer participation and a strengthening of democracy or instead will be used for suppression and manipulation by a central body." (Pos. 5) This example illustrates how digital safety, when linked with civic empowerment, contributes to the societal resilience needed to counteract potential abuses of power in the digital realm.

Rules for constructive debate

A foundational element of resilience lies in the establishment and enforcement of transparent rules that regulate digital interactions. Community guidelines, platform rules, and ethical frameworks outline what constitutes acceptable behaviour, aiming to prevent the spread of hate speech, misinformation, and other forms of harmful

> communication. These standards create an agreed-upon framework for engagement, ensuring users understand their rights and responsibilities: "To ensure that the debate is constructive and that all participants treat each other with respect, there are a few rules to follow. If you post a comment on 'Heute', you automatically agree to the rules below." (*The Comment Rules of Heute Forum*, Pos. 9)

4.4 Compliance

The objective of the **final research question** (RQ4) was to explore potential relationships between references to the normative principles of dialogic ethics (RQ2), inclusive accountability (RQ3), and the contextual factors influencing compliance. On this basis, our study intended to derive recommendations for the effective application and enforcement of relevant principles in communication practice – a step that would go significantly beyond the existing academic discourse on dialogic communication ethics.

However, our analysis soon revealed that the selected document corpus was only of limited value in pursuing this aim. Qualitative coding based on predefined categories showed that a considerable proportion of the documents collected contained no references to compliance-related aspects whatsoever. Where such content was present, its significance and level of detail varied substantially. For instance, concise mission statements necessarily remain superficial in their treatment of concrete strategies for implementing dialogic communication.

This observation raises the question of whether all document types are in fact expected to include information on compliance structures – or whether such content is more appropriately located in other, more operational or legally binding documents. Furthermore, the findings suggest that a certain degree of contextual or institutional knowledge is necessary to interpret the meaning and relevance of compliance-related references, especially when they are implicit or indirectly formulated.

To at least partially address this methodological limitation, our analysis of the compliance discourse drew on two additional sources. First, we revisited the quantitative coding from the descriptive document analysis undertaken in the initial research phase (see Section 3.2, particularly Table 3). Second, we implemented an automated word search as a supplementary analytical tool, enabling the reliable identification and processing of key terms in the context of compliance. Taken together, this combined approach provides a

multifaceted perspective on how normative and procedural aspects of compliance are communicated across different institutional and textual contexts.

Automated text search

Our automated word search enabled the identification of selected compliance-related terms across all 429 documents collected for this study. Particularly revealing was the comparison between documents originating from different legal and regulatory contexts. For this purpose, we drew on the quantitative coding from the initial research phase, in which the DIACOMET researchers distinguished between mandatory (n=94) and non-mandatory (n=335) codes and guidelines. As part of our automated analysis, targeted searches were conducted for terms such as "compliance/comply", "implementation/implement", "monitor/monitoring", "enforcement/enforce", "breach", and "sanction".

In the set of mandatory documents, 87.2% contained at least one of the search terms, compared to 68.1% in the non-mandatory set. Within the mandatory set, the most frequently occurring term was "compliance/comply" (62.8%), followed by "implementation/implement" (51.1%) and "enforcement/enforce" (40.4%). By contrast, the non-mandatory documents consistently exhibited lower frequencies for each term, with "compliance/comply" appearing in 48.1%, "implementation/implement" in 29.3%, and "enforcement/enforce" in only 16.1% of cases.

The same analytical procedure was applied to the distinction between procedural (n=138) and voluntary (n=291) documents, highlighting divergent approaches to the implementation and enforcement of the principles embodied in the respective codes and guidelines.

In the procedural category, 86.2% of documents included at least one of the targeted terms, compared to 65.6% of the voluntary documents. Across both categories, "compliance/comply" was the most frequently detected term, followed by "implementation/implement" and "monitor/monitoring". Procedural documents exhibited a higher relative frequency of all search terms – particularly "enforcement/enforce" and "sanction" – despite the smaller sample size.

Taken together, the findings from both comparisons indicate notable differences in the prevalence of compliance-related terminology across document categories. Documents classified as mandatory or procedural tend to include a greater density of such terms

than those identified as non-mandatory or voluntary. While this may reflect differing degrees of normative or regulatory emphasis, further contextual interpretation is required to assess the implications in greater detail.

The following sections focus on selected examples from our sample that illustrate notable differences and commonalities between documents in terms of their legal and regulatory context, as well as their respective approaches to implementation and enforcement.

4.4.1 Legal and regulatory context

The legal and regulatory contexts in which the examined codes and guidelines operate span a wide range of governance models – from traditional instruments of voluntary self-regulation to binding legal frameworks. As shown in Table 3 (see Section 3.2 above), more than three quarters (78.1%) of the collected documents were developed for use in voluntary self-regulatory processes (*non-mandatory*). The remaining quarter (21.9%) is associated with mechanisms established by law and overseen by designated bodies, often following a co-regulatory model (*mandatory*).

A substantial portion of the sample falls within the category of non-mandatory documents. These include traditional instruments of (journalistic) self-regulation, such as the Swiss Press Council's Code of Conduct – the Declaration of the *Duties of Journalists* – or the Netherlands Press Council's *Guidelines of the Council for Journalism*. The category also encompasses internal organisational documents, such as mission statements and editorial guidelines. Examples include the *Standards of Ethical Journalism* of Radio Free Europe/Radio Liberty and the *Code of Conduct* of the Slovenian investigative centre Oštro. These non-mandatory documents primarily serve to articulate professional values and organisational identities, rather than to impose formal legal obligations.

The legal and regulatory context underpinning the mandatory documents in our sample is multifaceted and closely tied to the statutory and institutional frameworks specific to their respective sectors or professions. In the field of journalism, for instance, the *Public Service Codex: The Fundamental Document of the Hungarian National Public Media Service* derives directly from the Act CLXXXV of 2010 on Media Services and the Mass Media (Mttv). Further examples of mandatory codes can be found in the Netherlands: the *Media Act 2008*, sets out binding provisions for both public and commercial broadcasting. Compliance with this legislation is monitored by the Dutch Media Authority, which is empowered to impose fines or other sanctions in the case of non-compliance. Another case is the *NICAM Kijkwijzer*

Reglement, which provides a mandatory classification system for audiovisual content that operates within a co-regulatory framework supported by statutory provisions.

The word cloud analysis (see Figure 6) highlights dominant terms that reflect the legal and regulatory context present in both mandatory and non-mandatory documents. Frequently occurring terms such as council, code, and guidelines point to the strong representation of both co-regulatory and self-regulatory frameworks. The prominence of terms such as act, legal, and law further underscores the connection between these documents and formal legal authority.

Figure 6: Legal and regulatory context

Words that most commonly occur within the text passages coded "Legal and regulatory context"

Across mandatory and non-mandatory codes and guidelines, key normative principles of dialogic ethics – such as duties of loyalty, autonomy, and responsibility – are consistently present. In mandatory codes, which are anchored in legislation or formal co-regulatory frameworks (e.g., public service broadcasting laws), these principles are often expressed as binding obligations.

Public broadcasting

The *Editorial Statute* of the Austrian Broadcasting Corporation (ORF) is grounded in a mandatory legal framework. Its authority is derived from the Federal Constitutional Act on Safeguarding the Independence of Broadcasting of 10 June 1974, Federal Law Gazette No. 396 (BVG-Rundfunk), as well as from the current version of the ORF Act. The statute

is legally mandated, ensuring that ORF operates within a framework that both safeguards editorial independence and enforces compliance with statutory obligations. Similarly, the Act on RTV Slovenia constitutes a legally binding statute that defines the public service remit, organisational structure, and responsibilities of RTV Slovenia. This includes documents such as *The Standards and Rules of Communication on the Website Rtvslo.si*, which further specify normative and procedural expectations.

In addition, many documents explicitly acknowledge their relationship with broader ethical or professional frameworks by referencing external charters and guidelines. In essence, these codes reflect a dynamic interplay between legal mandates, institutional oversight, and professional ethics – situating themselves at the intersection of formal regulation and normative guidance. For instance, the *Hungarian Public Relations Code of Ethics* states: "The MPRSZ has developed the Code in the spirit of the following documents: a. the Code of Professional Conduct of the International Public Relations Association (IPRA), [...] b. the European Code of Professional Conduct promulgated by the European Public Relations Confederation in Lisbon [...], c. the Code of Ethics for Digital Communication of the Austrian Public Relations Ethics Council [...]" (Pos. 8–11).

Moreover, several documents highlight the distinction between ethical orientation and legal enforceability by explicitly stating that their contents should not be construed as legal advice or as establishing legal rights and obligations. A prominent example can be found in the *EU Ethics Guidelines for Trustworthy AI* by the European Commission, which clarify the non-binding nature of their recommendations: "Compliance with this assessment list is not evidence of legal compliance, nor is it intended as guidance to ensure compliance with applicable law. Given the application-specificity of AI systems, the assessment list will need to be tailored to the specific use case and context in which the system operates." (Pos. 292)

Interestingly, our analysis of the potential impact of the legal and regulatory context on the principles of dialogic communication and inclusive accountability does not suggest a direct causal relationship. In fact, the occurrence of core dialogic principles (see Section 4.2) differs only marginally across mandatory and non-mandatory documents. Both forms of dialogue – as a conceptual ideal and as an interactive practice – are frequently addressed throughout the sample, indicating that a commitment to dialogic communication is not confined to any specific regulatory framework.

Similarly, the idea of inclusive accountability – which encompasses notions of inclusivity, diversity, and resilience (see Section 4.3) – is reflected in both mandatory and non-mandatory

codes, albeit with varying emphases and enforcement mechanisms. In particular, mandatory frameworks that set out obligations for VLOPs and VLOSEs under the DSA often translate these normative values into enforceable commitments, such as measures to protect against hate speech and systems designed to safeguard online media users.

VLOPs, VLOSEs, and the DSA

All 16 VLOPs and VLOSEs included in our sample are subject to regulatory obligations under the EU's DSA. As entities with significant systemic influence on the public sphere, they are legally required to comply with enhanced standards regarding transparency, risk mitigation, and content governance. While the analysed platforms clearly fall within the DSA's scope, it is noteworthy that their internal codes and guidelines rarely include direct references to the regulation. Instead, references to DSA-related obligations are more commonly found in external policy documents – such as regulatory briefings, compliance assessments, or public statements – that contextualise or interpret these regulatory expectations. Notable examples include the *Agenda Policy Brief 8: Information Integrity on Digital Platforms*, which discusses the governance of digital spaces and the role of major platforms, and *The Strengthened Code of Practice on Disinformation 2022*.

4.4.2 Implementation and enforcement

In addition to the legal and regulatory contexts, the dataset presented in Table 3 (see Section 3.2) also allows for a differentiation of the documents with regard to their respective strategies for implementation and enforcement. More than two thirds (67.8%) of the codes and guidelines in our sample leave the decision on how to implement the code's provisions to the addressees themselves. These documents do not establish a specific monitoring body, nor do they specify consequences in cases of non-compliance, and are therefore classified as *voluntary*. By contrast, the remaining third (32.2%) of the documents is associated with a defined enforcement mechanism involving an assigned body that is authorised to take action in response to breaches of the code. These *procedural* frameworks often involve ethics committees or comparable bodies tasked with monitoring compliance, investigating allegations of misconduct, and imposing appropriate sanctions. Some of the documents explicitly emphasise the role of such bodies as integral to ensuring organisational integrity and procedural fairness – positioning them as central governance structures with both oversight and enforcement functions.

Our word cloud analysis (see Figure 7) reveals that key terms such as committee, policy, violation(s), and complaint (board) feature prominently, indicating a range of procedural contexts in which enforcement is institutionalised. Notably, the co-occurrence of terms such as remove, report, and procedure suggests that discussions of code compliance are frequently accompanied by references to concrete mechanisms and consequences designed to uphold established standards.

Figure 7: Implementation and enforcement

Words that most commonly occur within the text passages coded "Implementation and enforcement"

As indicated, voluntary documents constitute the majority within the analysed sample and encompass a broad spectrum of formats. These include rules for online engagement – such as NU.nl's *House Rules* – as well as mission statements like that of Swiss Radio X (*Mission Statement*), and internal editorial codes adopted by media organisations.

A noteworthy example featuring explicit rules on implementation and enforcement is provided by the Estonian Broadcasting Council's *Principles of Impartiality and Balance of the Public Service Broadcasting Programme*, which set out detailed procedures for investigating violations: "The board of the public service broadcasting organisation may appoint a person or group of individuals responsible for analysing cases of violations of the rules of impartiality and balance in programming and have the authority to make proposals to the board for the implementation of sanctions." (p. 9)

Some codes also specify who is responsible for handling complaints, how investigations should be conducted, and what types of sanctions may be imposed in cases where ethical standards are breached. Codes that apply to employees typically contain a range of

provisions aimed at promoting integrity, accountability, and professionalism. Employees are expected to adhere to ethical guidelines and are required to report any observed or suspected violations. Reporting mechanisms often include direct supervisors or designated internal systems, such as whistleblowing channels. A brief example of such a system can be found in the Lithuanian *ON MEDIA, UAB Code of Ethics*: "Complaints about possible violations of the Code by ON Media, UAB journalists are examined by the ON Media, UAB Journalist Ethics Commission, established by the order of the General Director of ON Media, UAB. Journalists' activities, when violating the provisions of the Code, are grounds for the employer to apply disciplinary measures." (Pos. 51–52)

> ## *Disciplinary measures*
>
> Disciplinary measures constitute a critical component in the discussion of implementation and enforcement, with several documents in our sample specifying a range of possible sanctions. Ethical violations may lead to formal disciplinary – or in some cases legal – consequences, thereby reinforcing the binding nature of the standards, even when not supported by fully procedural frameworks. Sanctions outlined include verbal or written warnings, formal reprimands, monetary fines, suspension, or termination of employment. A tiered system of disciplinary actions is typically defined to address varying degrees of ethical misconduct: "The rules of conduct of the *KPN Company Code* and sub-codes are not without obligation. On the basis of reports, KPN may conduct investigations (or have them conducted) into the conduct of employees in compliance with the applicable procedures. Violations are followed by disciplinary measures as stated in the KPN collective labour agreement, ranging from a warning to dismissal." (Pos. 91–92)

Finally, some documents – both voluntary and procedural – explicitly state their scope of applicability (e.g., to all employees) and include provisions for periodic review and revision. This commitment to continuous improvement ensures that ethical codes and guidelines remain responsive to evolving standards and emerging challenges within both organisational and legal contexts. In addition, several documents establish a clear linkage to relevant legal frameworks, aligning their provisions with applicable laws and regulations. This not only reinforces their enforceability but also underscores the potential legal consequences of ethical breaches – including consequences for media users. For example, a brief yet explicit clause is included in the *Comment Moderation Charter* of the Swiss AGEFI: "We reserve the right to delete any comment published on our website if it violates the above charter, without prejudice to our right to take legal action." (Pos. 10)

The fact that questions of implementation and enforcement are often addressed in additional – frequently external – documents inevitably limits the explanatory power of our analysis. In many contexts – particularly, though not exclusively, in co-regulatory settings – violations of the codes examined in this study are likely to result in tangible consequences for those responsible. However, the precise ways in which such breaches are sanctioned are not always evident within the documents analysed, as the relevant enforcement procedures often fall outside the scope of our material. This is emphasised by the fact that decisions on enforcement are often delegated to independent bodies, such as media authorities, rather than being handled directly by the originators of the codes. Accordingly, the insights outlined above should be regarded as illustrative rather than comprehensive, and warrant further investigation in future studies.

Nevertheless, our analysis offers several relevant insights that align with the core themes of DIACOMET. In some instances, the reporting of violations is explicitly framed as a dialogic and interactive process. Certain codes actively encourage all readers – including external audiences, not just internal stakeholders – to participate in ethical compliance mechanisms, thereby reinforcing a more inclusive and participatory approach to accountability. For example: "Ethical business conduct is our collective responsibility. If you notice any violations of the Telia Responsible Business Guide, please report them through our Speak Up Line." (Estonia – Telia's *Responsible Business Guide*, p. 1)

> *Moderating online communities*
>
> In particular, the codes and guidelines addressed to media users emphasise the need for active moderation and enforcement of established rules – an aspect that is closely tied to the safety and security of individuals in public communication. These measures include the removal of inappropriate content, the blocking of repeat offenders, and, in some cases, the reporting of violations to relevant authorities. Such practices are intended to preserve the integrity and safety of the online community: "Users who seriously or repeatedly violate the stated rules of the portal or deliberately disdain them may be warned, placed under control or their username blocked by the administrators." (*The Standards and Rules of Communication on the Website Rtvslo.si*, Pos. 24)

As previously observed in relation to the legal and regulatory background, our qualitative analysis indicates that key principles of dialogue (see Section 4.2) are present in both voluntary and procedural codes. Notably, procedural documents are more likely to reference dialogue as an interactive practice and frequently include concrete mechanisms that

operationalise dialogic engagement. This may suggest a more systematic commitment to participatory processes, such as feedback and complaint channels – often facilitated by independent ethics committees or ombudspersons. However, this relationship requires further, more detailed investigation.

5. Summary and discussion

This working paper presents the findings of an empirical inquiry aimed at identifying normative benchmarks for responsible communication in the digital age. The analysis focused on ethical codes and other normative guidelines from various European media systems, extending its scope beyond conventional journalism to include diverse forms of public communication. Showcased in the DIACOMET database, the study compiled 429 relevant documents from eight European countries, demonstrating the widespread adoption of such frameworks even in comparatively small national contexts.

The findings indicate that these normative texts exhibit **only partial congruence with the tenets of dialogical communication ethics (DCE)**, which advocate for the equitable involvement of all communicative agents. A predominant share of the analysed documents addresses journalistic practice, while provisions explicitly directed towards media users remain underrepresented. Institutional and market-oriented accountability frames dominate the field, whereas public, civically grounded models – those that would enable non-institutional actors to play a participatory role in shaping communication responsibilities – are comparatively rare. The regulatory status of most documents is non-binding, with only a minority offering clearly articulated mechanisms for monitoring or enforcing compliance. Emerging ethical challenges, particularly those related to AI, are rarely addressed. Marked differences between national contexts can be observed in several categories, although these did not form the central focus of this study.

The qualitative analysis of the material highlights a **wide array of ethical concerns and recurring normative dilemmas**. Issues such as the conflict between truth-telling and confidentiality were particularly prevalent, reflecting long-standing debates in journalism ethics. Likewise, the tension between protecting privacy and ensuring transparency emerged as a persistent theme. Given the high proportion of documents originating from journalistic contexts, the prominence of such themes aligns with expectations.

In contrast, **dialogue and participation are only marginally addressed** in most documents. Although a majority of texts (349 in total) include references to dialogue – either

conceptually or practically – these references are typically secondary. This is especially notable given that the documents often pertain not only to professional communicators but also to other categories of actors, including individual media users and citizens in a broader sense. Yet few of these frameworks provide robust criteria for fostering meaningful communication among diverse stakeholder groups.

Nevertheless, our study makes it possible to identify a number of cases where specific principles of dialogical communication ethics and inclusive accountability are foregrounded:

- Across nearly all documents, the notion of **responsibility** emerges as a central ethical reference point, frequently appearing in tandem with other normative concepts. Importantly, responsibility is increasingly framed as a shared obligation, extending beyond media professionals to include users of digital media.

- Expressions of **loyalty** are also recurrent, though varying in focus. These range from individual loyalty to an employing institution, to professional commitments to the public good or democratic values. Within the subset of documents targeting citizen-oriented communication, however, such expressions are less frequently encountered.

- **Autonomy** features prominently across different domains, particularly in terms of editorial independence in journalism and organisational self-determination in corporate contexts. The call for political independence is also apparent in a number of texts beyond the traditional media sector.

- In contrast to the aforementioned principles, demands for **inclusivity** – as one of the principles of inclusive accountability – are more prominently featured in documents within the public accountability frame. Numerous texts, both national and international, articulate commitments to equitable access, anti-discrimination, user empowerment, and the creation of inclusive communicative spaces.

- Calls for **diversity** are also prevalent. Content-related diversity is often framed through appeals to linguistic representation, while procedural diversity is primarily evident in anti-discriminatory provisions, particularly in international or supranational documents.

- The concept of **resilience** appears in multiple forms, encompassing both empowerment of individuals and citizens to engage in dialogue as well as ensuring a safe and secure environment for all actors participating in public communication

processes. Empowerment is especially emphasised in texts aimed at individual media users and online communities. Safety considerations likewise surface in the formulation of community guidelines.

However, **only a limited number of documents provide concrete strategies for ensuring adherence to these normative principles**. In many cases, compliance mechanisms are either entirely absent or merely referenced via links to external documents (e.g., in co-regulatory frameworks), which fell outside the scope of our analysis. Nonetheless, the study yields valuable implications for the development of governance models that articulate clear normative standards across different national and regulatory contexts. Further elaboration of such standards is anticipated in subsequent DIACOMET project phases.

Taken as a whole, the dataset enables a foundational reflection on DCE, which has been lacking so far in empirical media and communication research. Yet **significant gaps** persist. Many of the examined documents address only isolated operational aspects of dialogue, such as comment moderation or community management, while a more holistic understanding of DCE – its ethical premises and societal functions – remains largely absent. Few texts provide an explicit theoretical underpinning. To fully articulate the vision of DCE, dialogicality must be posited as a fundamental value from which additional ethical principles can be derived and applied consistently across diverse communicative relationships. Literature reviews conducted within DIACOMET suggest that rich theoretical resources are already available within the academic field to support such a framework. However, its implementation would require the articulation of targeted accountability measures and tools that engage all relevant stakeholders and foster inclusive, constructive dialogue. At this stage, our study can only offer preliminary insights in that direction.

As with any empirical project, this investigation is not without **methodological limitations**. While the cross-national approach – focusing particularly on smaller European media systems – is both innovative and well-grounded, the compilation of documents is not exhaustive. As such, direct comparisons between countries should be interpreted with caution due to varying degrees of equivalence (van de Vijver & Leung, 2021). Moreover, the sample does not include any media systems from other regions of the world, nor all possible national variants within Europe. Expanding the scope to incorporate a broader range of documents and additional countries may either validate or challenge our current findings.

Additionally, deeper insights into the ethical discourse within the public accountability frame – central to our research questions – require further conceptual and empirical elaboration. Previous comparative studies (e.g., Eberwein et al., 2018; Fengler et al., 2022) suggest that

mechanisms for civic media accountability remain weakly institutionalised, suggesting that formal codes and guidelines reflect only a small segment of the wider normative debate. To complement this picture, future research should also explore informal communicative norms and practices, including the expectations and behaviours of non-institutional actors. However, such inquiries would necessitate alternative methods – for example, stakeholder interviews or experimental studies.

Despite these caveats, our study illustrates the promising potential of DCE for enhancing the quality of public discourse. Accordingly, the DIACOMET project is committed to translating its findings into applied formats. One such effort is the **development of the Principles of Good Communication Conduct (PGC)**, inspired by exemplary practices identified through our empirical analysis and enriched through theoretical synthesis. This framework aims to serve as both a scholarly resource and a practical guide for communication professionals and policymakers. A preliminary draft of the PGC is provided in the Appendix of this report; further refinement and empirical testing will occur in subsequent project phases, with the final version to be presented upon project completion. Only through such efforts can a positive impact on social cohesion within democratic societies ultimately be expected.

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DIACOMET

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Appendix

Coding manual

Step 1: SCANNING

Main objectives/Codes/*Subcodes*	Description/A priori codes
Prevalence of the topics of moral disagreement	
Inductive scanning process	**Five main topics tackled by the code and "case summary" per coding**
Deductive scanning via THEMES 1-7	**One quantitative coding (Y/N) of all appearances (multiple coding is possible) + Open (inductive) codes**
THEME 1: Privacy vs. Transparency	Self-determination; Confidential data and information; Personal/sensitive data protection; (Informed) Consent; Right to be forgotten; Right to anonymity; …
THEME 2: Hate Speech vs. Freedom of Expression	Hate speech; Extreme, violent or offensive speech; Defamation; Public offence; Racist, sexist and homophobic content; Rights of others (reputation); Right to be listened to; Right of reply; …
THEME 3: Sensitive Issues vs. Inclusivity	Respect; Vulnerability; Minority groups/voices; Sensitive information/data; (Respectful) Representation; (No) Stigmatisation; Protection of identity; …
THEME 4: Loyalty vs. Public Interest	Confidentiality; Loyalty; Whistleblowing; …
THEME 5: Truth-telling vs. Confidentiality	Truth; Objectivity; Honesty; Transparency; Explainability; Authenticity; Duty to inform; Access to information; (Data) Transparency; Public data and information; The right to know; (No) Deception; …
THEME 6: Child Protection vs. Self-determination	Rights and/or dignity of children; Age restrictions; Protection from harm (of minors); No staging (of minors); …
THEME 7: Manipulation vs. Political Free Speech	Populist speech; Populism (rhetoric); Manipulation; Marginalisation; Polarisation; Propaganda; …
THEME 8: Inductive scanning of other themes/topics of moral disagreement	**Inductive coding of other relevant themes and topics of moral disagreement in public communication that are not meaningfully covered under the 1 to 7 key THEMES**

Step 2: SORTING/SELECTING

Main objectives/Codes/*Subcodes*	Description/A priori codes
Principles: Dialogue as a concept or as interaction	**Deductive scanning process – One quantitative coding (Y/N) and coders mark all appearances (multiple coding is possible) + Open (inductive) codes**
PRINCIPLE: DIALOGUE as a concept	Dialogue; (Democratic or public) discourse; Interact*ion; Participat*ion; Community-building; Discussion (platform); Exchange of opinions; Co-creation; (Stakeholder(s)/strategic partners) involvement; …
PRINCIPLE: DIALOGUE as interaction	Feedback; Comment (online or otherwise); Review; Interaction; Consultation; Contact (options); Vox pop/involvement of public opinion/opinions of ordinary; Encourage (constructive) comments; Concerns of audiences; Invite responses; Ask questions; Reference to institutions of dialogue such as ombudsperson or ombudsperson-like institutions (ombudspersons' regular blogs, reviews of recent feedback from users, resolutions of controversies between the newsroom and users); complaints board(s); co- or self-regulatory institution; …

Step 3: ANALYSING

*Qualitative analysis of all documents and coders mark all appearances (multiple coding is possible) + Open (inductive) codes

Main objectives/Codes/*Subcodes*	Description/A priori codes
Normative principles of dialogic communication ethics	
Actors and agents via subcodes	**Qualitative analysis of all documents and coders mark each appearance (once) per actors/agents category (multiple coding is possible) + Open (inductive) codes**
Journalist(s) *Citizen(s)/Individual users* *Media/Communication specialist(s), practitioner(s) or representative(s) (e.g. PR)* *Non media representative(s)* *Employee(s)* *(Online-)Community* *Political actor(s)*	
Duties of Loyalty	(Journalists') loyalty towards the audience/citizens/society; Loyalty to the own profession and/or other professions; Organisational loyalty; Networked loyalties; Loyalty obligations; Shared values ("We agree that … XY"; "It's our duty as journalists to … XY"); …
Autonomy	Autonomy – individual, personal; Autonomous (action); Independence; Non-interference; …
Responsibility	(Editorial) Responsibility; Rights of others; Respect; Reputation; Impartiality; Objectivity; Truthfulness; Honesty; Solidarity; Consciousness; Discretion; Care; 'Good' judgement; Mindfulness ("Think before…"); Value of tact; …
Normative principles of inclusive accountability	
Inclusivity	**Highlighting 'good practices', namely those occurrences which the coder considers outstanding in terms of detailedness, thoughtfulness, or any similar aspect**
Diversity: Content via subcodes	*****
Diversity: Content	**Highlighting 'good practices', […]**
Linguistic diversity	Different language versions of content/communication; Use of languages that reflect the linguistic diversity of the media's target area; Use of languages relied upon by marginalised groups; Use of gender-neutral language; Tone/style and language used in communication (engaging and approachable; plain, jargon-free, accessible language); …
Cultural diversity (representation)	Different cultural values; Different lifestyles; Variety of heritages; …
Societal diversity	Racial diversity; Sex and gender diversity; Disability status; Religious diversity; Age diversity; Multiplicity of ethnic origin
Diversity: Organisational/procedural via subcodes	*****
Diversity: Organisational/procedural	**Highlighting 'good practices', […]**
(Non-)discrimination in action: organisational, procedural, governance	Gender, race, language, religion, political opinions, belief, age, civil status, nationality, disability and/or sexual orientation; Fair and non-discriminatory general conditions of access
Inclusion in accountability actions and mechanisms	Elderly people; People living in rural areas; Persons with disabilities; Marginalised, vulnerable or disenfranchised people
Resilience via subcodes	*****

Resilience	**Highlighting 'good practices', […]**
Empowerment	Awareness; Strengthening understanding; (Individual) capacity; (Individual) sense of empowerment; Motivation to participate; Democratic participation; Citizens' involvement; Community outreach/involvement
Safety and security of individuals in public communication	(Digital) Safety threats/issues; Secure channels of communication; Safe environment(s); Protection against intrusions
Frames of accountability via subcodes	**Highlighting all relevant frames of accountability represented in the documents**
Professional frame	e.g., codes or guidelines by journalistic associations or other media-related professions, but also media-external professions as long as they have any guidelines for communication
Market frame	e.g., codes or guidelines by specific newsrooms or other media-related companies, but also media-external companies with guidelines for communication
Political frame	e.g., codes or guidelines by public officials, individual politicians and political groups, as long as they are related to communication
Public frame	e.g., codes or guidelines by members of civil society, NGOs, media users, etc., if related to communication

Step 4: IMPLEMENTING

Main objectives/Codes/*Subcodes*	**Description**/A priori codes
Contextual factors of compliance	
Implementation and enforcement	**Coding of all aspects related to implementation and enforcement mentioned in the document**
Voluntary; OR Procedural	Breach* (of the code); Sanction*(s) (in case of breach of the code); Enforce*(ment) (of the code); Implementation (of the code); Compliance*/Comply* (with the code); Monitoring (of compliance with the code)
Legal and regulatory context	**Coding of all aspects related to the legal and regulatory context mentioned in the document**
Mandatory; OR Non-mandatory	

Principles of Good Communication Conduct (PGC) – A preliminary draft

Preamble

The main objective of dialogic communication ethics is to promote and advance a safe and worthy communication culture that focuses on the ways of strengthening benevolent relationships between people. The focus on the quality of communication differentiates principles of dialogic communication ethics from professional ethics, such as journalism, where the focus is on the quality of information. However, the quality of both dialogue and information are intertwined – dialogic communication is always based on truthful, reliable, and complete information. The suggested Principles of Good Communication Conduct (PGC) therefore, consider information quality as a necessary condition for the advancement of dialogic communication.

Compliance with information quality requirements motivates the parties of discussion to be sure about reliability and truthfulness, as well as relevance of information used in dialogic communication.

Professional autonomy of journalists is a precondition for fulfilling the duty of serving the public interest (loyalty to the public). The individual autonomy of a discussion participant supports their equality in communication, mutual respect, and the freedom to speak out without fearing the consequences.

Values and principles that support equality and safety in communicative situations

1. No one's human dignity may be violated in or through communication.

2. Each participant of dialogue should have the opportunity to express their views freely and in equal manner, without fear of repercussions.

3. The greater the power of one party in a communication act, the greater their responsibility to ensure that the principles of good communication are applied.

4. The use of manipulative techniques to gain power in communication is unacceptable.

5. "Cancelling" (boycotting, takedown), publicly presenting and disseminating unfounded and personal accusations are not in line with good communication practice.

6. The greater the vulnerability of a person in a communicative situation, the more others (including witnesses) have a duty to protect them immediately, and later from possible consequences.

6.1 Vulnerability in a communicative situation can be related to age, health, professional position or various roles. Consequently, vulnerability should be defined case by case.

Principles that ensure a successful dialogue concerning inclusion and feedback

7. A good communicator will give descriptive and non-judgemental feedback when necessary. In order to foster dialogue, communicators strive to give and receive constructive criticism, with agreements to this effect.

7.1 Personality criticism, labelling, demeaning or disproportionally amplified criticism is reprehensible, in particular if this happens in public.

Values and principles that guide positive relations and mutual respect between people in cases of conflicting opinions and interests

8. If a person wishes to express their opposite or different opinion or need(s), they have the right to expect to be heard and understood.

9. Listening and understanding do not always mean agreement, also dissent must and can be accepted.

10. In promoting dialogue, it is important to try to understand the reasons for disagreement.

11. A good communicator values courtesy, including in cases of disagreement.

Principles that support personal autonomy and informational self-determination

12. Each individual must have the possibility to determine what and how much personal information they want to share publicly. They should take the responsibility to ensure that this information is truthful (informational autonomy).

13. Persons possessing information or other power should involve those concerned in the debates and share respective information with them. "Talk to the person, not about the person" means inclusion of concerned individuals in any communication about them.

14. "No-message" should be always respected and abided by.

15. Personal autonomy of minors and the extent of the measures for protecting them from harm should be balanced responsibly.

Principles that ensure a successful dialogue via listening and response

16. For successful dialogue, participants should listen to each other, and if necessary, summarise and clarify what they have heard, and how they have understood the other party.

17. Successful dialogue presupposes that all participants in a communicative act have equal possibility to receive relevant information that supports their ability to conduct evidence-based argumentation.

18. Successful dialogue requires noticing and accepting the other parties' feelings (expressing empathy).

19. Good dialogue requires that communicators express their needs in terms of the self ("I or my message").

Principles underpinning compliance with information quality requirements

20. All parties in dialogue should value honesty and truth.

   20.1 A good communicator does not create or spread misinformation and/or partial truth.

   20.2 A good communicator is attentive to missing information.

   20.3 A good communicator is attentive to signs and assumptions that create misunderstandings in communication.

21. A good communicator detects propaganda and half-truths in the best possible way, does not spread false and misleading information.

22. A good communicator takes responsibility for what is read or written.