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Journalists' Autonomy around the Globe: A Typology of 46 Mass Media Systems

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Abstract: Using structuration theory, assuming that every government has a stake in steering public communication and comparing 46 nation-states, this paper explores the major principles that can be used to explain different mass media structures around the globe. The study draws on extensive documentary analysis and includes more than 150 expert interviews. It shows that media freedom and journalists' autonomy depend on not only the particular governmental system, the constitution, journalism education, and the existence of commercial media but also, to a significant extent, on economic realities, the tradition of press freedom, and various other factors that are historical, religious, and/or geographic. The tool to do so is a mass media system typology based on two dimensions: formal expectations and the state's influence.

Keywords: mass media systems, comparative research, documentary analysis, expert interviews, typology

Using structuration theory, in line with Anthony Giddens (1984), and assuming that every government has a stake in guiding, steering and controlling public communication, this paper explores the major principles that can be used to explain different mass media structures around the globe. Who or what does actually influence journalists' working conditions, their autonomy, and the quality of the media content in certain societies?

This paper argues in favor of maintaining the nation-state as the analytical unit in mass media systems research, even in the age of the Internet and globalization (Pfetsch and Esser, 2008) and despite both technological convergence and the increasing importance of transnational television and radio offerings (Flew and Waisbord, 2015). The key argument is based on states' natural interest in guiding, steering and controlling the public information and opinion-forming stages. In big countries, such as India, this may be equally applicable to subnational units (Chakravartty and Roy, 2013). How the people in charge can serve this interest, however, differs from world region to world region. Looking beyond the "tiny handful of countries" upon which evidence in communication research is usually based (Curran and Park, 2000, p. 3) and comparing 46 national mass media systems around the globe, the present paper has two main aims.

The first is to sharpen the perception of how ruling powers exercise a controlling influence over mass media content. Second, in doing so, the paper calls for approaches that leave the close link to political systems research behind, and it seeks to examine societal structures in a more general way. The study's main result is that media freedom and journalists' autonomy depend on not only the particular governmental system, the constitution, journalism education, and the existence of commercial media but also, to a significant extent, on economic realities, the tradition of press freedom, and various other factors that are historical, religious, and/or geographic. This list of influences shows that I conceptualize mass media structures not as cause (of certain content, for example) but as effect (of certain societal structures), and this differs from the usual research approaches. The resulting typology (as presented in the results section) is a tool that can be used to explain the differences in the media's performance around the globe (conclusion).

Comparative research on mass media systems and journalism cultures is currently popular (e.g., Thomaß, 2013). The landmark book *Comparing Media Systems* (Hallin and Mancini, 2004) triggered a flood of follow-up studies and publications that underpinned or extended the original typology (e.g., Brüggemann et al., 2014), transferred it beyond the Western world (e.g., Hallin and Mancini, 2012), or criticized it fundamentally (e.g., Norris, 2009; Hardy, 2012). Furthermore, there are competing approaches, such as that of the Worlds of Journalism research group, which focuses on journalism cultures (e.g., Hanusch and Hanitzsch, 2017); Kathrin Voltmer (2013), whose work focuses on transitional democracies and path dependencies; Robert McKenzie (2006), who studied media regulation and financing in eight very heterogeneous countries; and Roger Blum's typology, which covers 23 countries from all over the world (Blum, 2014). All of these researchers carry on a tradition that was started by Siebert, Peterson, and Schramm (1956) and extended, as well as criticized, by Nixon (1960), Merrill and Lowenstein (1979), Hachten and Hachten (1981), McQuail (1983), Wiio (1983), Altschull (1984), Picard (1985), Breunig (1994), Blumler and Gurevitch (1995), Nerone (1995), and Yin (2008), to name some of the more prominent authors. Altogether, these studies have radically expanded our knowledge of mass media systems. The very same is true for the media freedom rankings by interest-based organizations, which play a crucial role in policy consultations and attract considerable public interest, at least in the developed West (e.g., Freedom House, Reporters without Borders, and IREX).

The academic and applied lines of research have a number of commonalities. Both lines originated in the United States and, therefore, in a highly liberalized and mainly self-regulated media environment. Moreover, they share a strong focus on the media's role in facilitating democratic decision-making and, closely linked to this, on state restrictions on the freedom of expression. Although there are exceptions—for example, the fact that the political economy highlights constraints that are rooted in ownership structures and the media's dependency on advertising (e.g., Wasko, Murdock, and Sousa, 2011) or the “positive concept of freedom” that

promotes the idea that the state should actively create a framework for journalists (Sapiezynska and Lagos, 2016, p. 550)—the starting point of both research lines tends to be the relationship between mass media, politics, and media bureaucracy. Consequently, most research is on state control, restraints and obstacles, media partisanship, political parallelism, media law, politically motivated attacks on journalists, and the ideological foundations of the respective mass media systems. This approach underestimates culture, audiences, and economical influences, and devaluates non-Western countries, which are at the bottom of the dominant media freedom indexes (Becker, Vlad, and Nusser, 2007; Sapiezynska and Lagos, 2016). Part of the game is the Western perspective on concepts that can be understood in different ways (Altschull, 1984; Rantanen, 2013).

In addition, in regard to the popular media freedom rankings, as well as the models, theories, and ideal media system types developed at universities, most available classifications aim to explain the differences in media content, role perceptions, and media usage. In other words, in keeping with communication studies' disciplinary logic, national media structures are seen as just another crucial component of the complex chain of media effects. In comparative research, knowledge of mass media systems, therefore, results in sampling strategies, which include as many different models as possible (e.g., Ostini and Fung, 2002; Benson, 2010). This, in turn, leads to two consequences. On the one hand, mass media systems research neglects the reasons for the differences in media structures around the globe. In line with the classic *Four Theories of the Press* (Siebert, Peterson, and Schramm, 1956), the respective typologies use either the underlying objective of the media as the criterion for the differentiation of mass media systems, or they rely on the categories, factors, and indicators listed in the literature on mass media systems. In one extreme case, Blum (2014) includes 11 dimensions that run the gamut from history, as well as political and journalism cultures, to media ownership, financing, and freedom. On the other hand, this example shows that the criteria are often not selective, nor do they clearly separate cause from effect. A more prominent example is Hallin and Mancini (2004), who use political and media dimensions exclusively (media market structures, political parallelism, the professionalization of journalism, and the role of the state). Their typology, which is based on all four dimensions, shows only how politics and mass media fit together, and it allows to bring order into the diversity of countries. The function of knowledge organization also applies to attempts at measuring, quantifying, and, ultimately, classifying mass media systems (Brüggemann et al., 2014).

The present paper takes a step back to examine the rules governing mass media structures. The way to the target is, once again, a mass media systems typology. Despite being grounded in qualitative methodology, this typology works similarly to cluster analysis. More specifically, solely two empirical criteria are the basis of the categorization. To determine influences on mass media structures, like the computer programs used to conduct quantitative data analysis, I did look for additional variables that are shared by countries of a certain type. To generate general

insights into the interaction between agency and structure, this study integrates the known mass media system dimensions into social theory. As the first step, using structuration theory (Giddens, 1984), the present paper develops a set of categories that can guide mass media system analysis. In step two, it applies this system of categories to the 46 countries that were selected using the theoretical saturation method (Glaser and Strauss, 2008). The material on which the study is based was collected and analyzed using the triangulation method. This paper draws primarily on extensive documentary analysis (constitutions, media laws, media regulations, press freedom indices, academic reports, and historical accounts). In addition, to fill the gaps left by the available documents and to gain alternative perspectives, it includes data from more than 150 expert interviews.

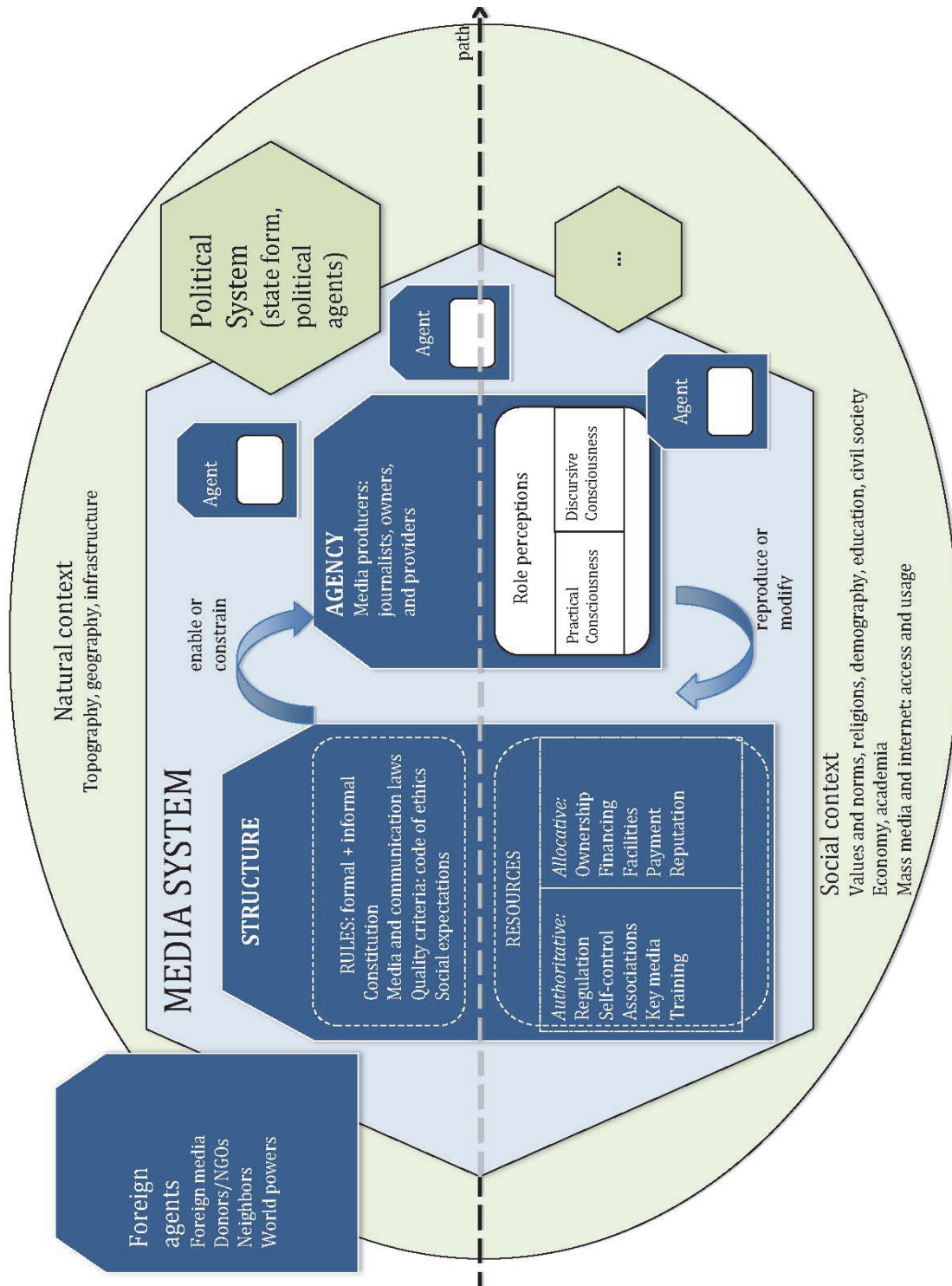
Research Categories

Like any other social theory, Giddens' structuration approach provides terms that describe reality. According to Giddens, these terms help to transfer knowledge from practical to discursive consciousness. Like any other social theory, Giddens provides a certain perspective on society that includes cause–effect relationships (Kort and Gharbi, 2013). First, structuration theory places emphasis on agents. Simply put, Giddens believes in agents' capacities to change structures. Particularly in mass media systems research, structures, such as media laws, licensing authorities, media ministries, or social taboos, are usually seen as restrictive. In contrast, Giddens asserts that the structures and the agents cannot be separated but are deeply intertwined in what he calls the “duality of structure.” Based on his approach, “structures” (or “social structures”) are “recursively organized sets of rules and resources” (Giddens, 1984, p. 25). Rules restrict social actions, while resources facilitate them; thus, structures are both constraining and enabling. To use the above examples, without media laws and authorities, there would be no journalism. Part of the duality of the concept of structure is that agents, such as journalists, media owners, politicians, journalism educators, and media activists, have an impact on rules and resources by reproducing or modifying them. Therefore, according to Giddens, agents are even able to change national mass media systems.

Applying this approach to mass media systems, transforming its basic assumptions into a visual format, and, in this way, displaying the present study's research categories, Figure 1 is a type of summary. At the edges of the figure are the social and natural contexts of national mass media systems. In structuration theory, social systems refer to the reproduced practices of agents, who are physically or mentally co-present, which is another reason why structuration theory is appropriate for mass media systems research. Thus, social systems are “grounded in the knowledgeable activities of situated actors who draw upon rules and resources” in different action contexts (Giddens, 1984, p. 25). Parts of the mass media system's natural context are geography, topography, and infrastructural features. The social context includes religions, values and norms, civil society, education, and economy, to

name the most prominent dimensions. In keeping with the literature referred to so far, Figure 1 gives priority to the political system, which obviously has an impact on mass media. However, the judicial, economic, cultural, and other systems are not absent but are represented by the empty field in the bottom right corner.

Figure 1: Research Categories



Further inside the figure—apart from the co-present foreign agents, such as transnational broadcasters, Internet sites, and NGOs or donors offering, for example, training for journalists—individual, collective, and corporative agents, such as media owners, media producers, and media unions are displayed. It is crucial to note here that, first, these agents know about the others, which is why they observe each other and adjust their behavior accordingly. Second, all agents have certain role perceptions, which are anchored in their practical and discursive consciousness. Because practical consciousness includes implicit knowledge about agents' behavior in certain social situations, people are unable to express all role perceptions and rules discursively.

However, all agents are aware of the written and unwritten social rules and routinely apply them in the production and reproduction of their day-to-day encounters. Using Giddens' terminology, rules are frameworks or guidelines for how media professionals should act. Examples are the national constitution and media laws (both of which are formally codified rules) or quality criteria, such as codes of ethics. Resources, in turn, are the media through which agents exercise power. Giddens distinguishes between allocative resources, which refer to capabilities for generating command over material phenomena, objects, and goods, and authoritative resources, which generate command over people (Giddens, 1984, p. 33). The former include ownership, as well as financial and working conditions, and the latter include media authorities. Finally, as symbolized by the dashed line in the middle of Figure 1, a national mass media system and its context both develop along a historical path (Voltmer, 2013). This means, on the one hand, that all the social systems of a certain country are in constant change. On the other hand, without considering the past, there is no understanding of the present, because media outcomes “differ depending on the role the media have played” in previous regimes (Voltmer, 2013, p. 8).

In the context of the present study, five points are important. First, although the categories presented in Figure 1 do not initially appear to differ substantially from those presented in the extant literature, the use of social theory allows for explanations of cause and effect and the generation of insights into the interaction between agency and structure. Second, the focus on media actors, their resources, and (written and unwritten) rules governing these actors is the key to understanding how the mass media works in a certain society. In this study, being in keeping with Lauk and Harro-Loit (2017, p. 1960), the term autonomy “presumes journalists' independence from external pressures and complete loyalty to the public.” Leading to the third point, this means that the use of only two arrows in Figure 1 is a form of streamlining. Journalists' independence can be limited not only by the structures that have been mentioned but also by the social and natural contexts; individual, collective, and corporative agents from any other social system; and foreign agents. Fourth, as is the case for most other models, Figure 1 both simplifies complex interactions and captures the present state of change. The term “path,” meaning the historical roots of structures, agents, and

interactions, cannot really fill this gap. Finally, the categories in Figure 1 function as a kind of divining rod that guides the search for research material. To illustrate this at the level of structures, for each country, I had to look for the constitution, media laws, and quality criteria (rules); for bodies of regulation and self-control, journalists' unions, and key media; and for journalists' working conditions (media ownership and financing, facilities, payment, and reputation) and journalism education.

Research Design

To obtain reliable information on all the categories mentioned in Figure 1, this paper draws on extensive documentary analysis to compare 46 national mass media systems that were selected according to the theoretical saturation method (Glaser and Strauss, 2008). The sampling procedure had two stages. In the first stage, which entailed deliberate selection, the member states of the G7 (Canada, France, Germany, Italy, Japan, the United Kingdom, and the USA) in addition to Brazil, Russia, India, China, and South Africa (the BRICS) came in as must-haves. Even if one can argue about one case or another, these global powerhouses are role models, reference points, and even media format and media content distributors for many other countries. While the G7 countries are located primarily in the West, the BRICS countries comprise a number of important and growing nations that are on the brink of becoming global players (Nordenstreng and Thussu, 2015). The second step of the sampling procedure involved applying a different systems design (Anckar, 2008), varying the social context and the media and political structures (Figure 1), and aiming to achieve theoretical saturation; therefore, the selection criteria were as follows:

- cultural zones based on the World Values Survey (African, South Asian, Protestant and Catholic European, Orthodox, Confucian, ex-Communist, English-speaking, and Latin American; e.g., Inglehart and Baker, 2000);
- media freedom tradition and ranking (from rather high to very low); and
- political structures (democracy, transition to democracy, semi-authoritarian, authoritarian, and fragile).

Any concrete decision regarding a specific country is, therefore, contestable. For example, based on the criteria outlined above, every Scandinavian country would have been consistent with the very same characteristics (European democracy, top-ranked). The fact that Sweden, instead of Norway and Denmark, is finally a part of the sample is simply because there was easier access to experts there and, more importantly, because saturation was achieved. Other examples are Rwanda (to represent French-speaking Africa), Kuwait (to represent an Islamic monarchy), Kazakhstan and Ukraine (to represent former Soviet republics), and Hungary (to represent the transition to democracy). The selection procedure was ended whenever new cases did “not add any new information” to the understanding

(Auerbach and Silverstein, 2003, p. 102). Despite the inclusion of 46 nation-states, the missing countries remain a weakness of this study. Without in-depth research, there is no telling whether there would have been new insights from new cases.

For each country, a report was written by a graduate student. Altogether, eight students took part in a master's class that lasted a full year and included media systems, comparative research, structuration theory, and intensive training in qualitative research methods (source investigation, expert interviews, and evaluation procedures). The group was also involved in the development of the category system. As previously mentioned, the categories displayed in Figure 1 guided the search for material. The first and most important sources were documents—constitutions and media laws; court decisions; reports from NGOs, such as Freedom House, IREX, and Reporters Without Borders; statements from authorities (e.g., ministries); and academic literature, including studies on journalists' role perceptions, the media's reputation, journalists' working conditions, and journalism training.

As the second source, we interviewed experts. The aim of these interviews was to facilitate interpretation of the legal texts, interest-based reports, or information given by those in government. Giddens' approach in fact demands that agents are taken seriously. Therefore, the interviews provided insights into both structures (resources and informal rules) and the constellations of actors. To become an expert in this study, the interviewees had to deliver inside knowledge of the topics covered by one or more of the research categories (Figure 1). The people who were interviewed were leading local journalists with many years of professional experience, media authorities, unionists, media educators, NGO workers, foreign correspondents, and academics. In total, I collected more than 150 interviews (cf. Table 1). A look at the table in question shows, first, that the numbers of interviewees differed considerably from country to country and, second, that some country reports did not use any expert sources. The reasons for this are threefold. Apart from the increase in knowledge of the researchers as a result of the research process, which reduced the value of this source, for countries such as Israel, China, France, or Brazil, there was extensive academic and applied research literature available. In addition, while most of the experts answered via Skype, phone, or email, some interviews took place on site (Cuba, Egypt, Pakistan, Russia, Tanzania, and Uganda). Therefore, the number of interviewees is higher in these cases. The fieldwork started in 2014 and was completed in December 2017.

Table 1: Interviewed experts (n=185). No interviews: Argentina, Brazil, Canada, China, France, Hungary, Israel, Kazakhstan, Sweden, Taiwan, Ukraine

Country	Expert sources
Australia (4)	3 journalists, 1 foreign academic
Belarus (6)	4 journalists, 1 foreign correspondent, 1 university lecturer
Bolivia (6)	2 academics, 1 foreign correspondent, 1 media authority director, 1 diplomat, 1 NGO
Bulgaria (3)	1 academic, 1 managing editor, 1 journalist
Cuba (5)	3 journalists, 1 foreign correspondent, 1 NGO activist
Egypt (12)	3 media researchers, 4 foreign correspondents, 4 journalists, 1 political scientist
Germany (2)	2 journalists
Ghana (4)	1 media authority, 1 NGO, 1 local entrepreneur, 1 foreign news manager
India (1)	1 academic
Indonesia (2)	2 academics
Iran (7)	1 foreign correspondent, 2 academics, 1 NGO activist, 3 citizens
Iraq (11)	4 journalists, 1 media owner, 2 NGO, 1 academic, 3 foreign correspondents
Italy (3)	1 journalist, 2 foreign correspondents
Japan (1)	1 foreign entrepreneur
Kuwait (4)	1 journalist, 1 academic, 2 government sources
Malta (6)	2 journalists, 1 unionist, 1 media owner, 2 academics
Mexico (7)	3 journalist, 1 foreign correspondent, 2 NGO activists, 1 academic
Myanmar (5)	4 journalist, 1 foreign academic
Namibia (6)	2 journalists, 1 academic, 1 media authority member, 1 diplomat, 1 NGO
Netherlands (4)	2 academics, 2 media and public administration consultants
North Korea (2)	1 documentary film maker, 1 NGO activist
Pakistan (15)	5 journalists, 5 NGO activists, 3 unionists, 1 politician, 1 correspondent
Peru (2)	1 journalist, 1 citizen
Russia (10)	6 journalists, 4 academics
Rwanda (1)	1 foreign correspondent
Singapore (5)	1 journalist, 1 foreign correspondent, 3 academics
South Africa (1)	1 journalist
Spain (1)	1 journalist
Tanzania (8)	4 journalists, 2 media authority members, 1 media lawyer, 1 NGO activist
Turkey (9)	3 journalists, 2 foreign correspondents, 4 academics
Uganda (21)	12 journalists, 3 unionists, 3 NGO, 1 academic, 1 presidential adviser, 1 media authority
UK (2)	1 journalist, 1 academic
USA (2)	2 academics
Venezuela (8)	2 journalists, 1 foreign journalist, 2 NGO, 2 academics, 1 citizen
Vietnam (1)	1 foreign journalist

For both sources, validity, reliability, and representation are an issue. While some of the documents upon which this study is based are shaped by Western research traditions and may, therefore, have a certain focus on, for example, traditions of bribery, favors, and gifts, the expert interviews are even more questionable. First, there is simply no independent expert. Second, experts can contradict each other. Third, taking into account language and cultural barriers, not every expert talks to social scientists. The tool to address these problems is, once again, the category system (see Figure 1). Based on my knowledge of the shortcomings of every single source, for each category, I attempted to rely on a maximum amount of information from various perspectives. This included confronting experts with conflicting statements from other experts and from literature. Restated in other terms, the category-driven approach this study is based on does not require a certain number of interviews for every single country. The only thing that counts in the end is the amount of information and perspectives available in the various categories.

To analyze the data from both sources (documents and experts), I followed a theory-driven approach, which differs from any classical grounded theory and hermeneutics. The procedure can be best described as “theoretical coding,” that is, using the theoretical concept (cf. Figure 1) to interpret the research material (Creswell, 2007, pp. 156–7). The initial finding was a portrait created for each country. These portraits then formed the basis for the mass media system typology. First, I needed to find dimensions that grasped the similarities and differences between types of countries. Then, I used the concept of attributed space (Lazarsfeld and Barton, 1951) to gain an overview of all the potential combinations of the dimensions and started sorting the countries. With each new portrait, I decided whether the mass media system was similar to any of the others that had been sorted previously or whether it represented a completely new case in the attributed space. Using the typology as an analytical tool (i.e., identifying influencing factors) similar to cluster analysis, I looked for further characteristics shared by the different types (presented in the conclusion section). Finally, I characterized the types, seeking to find appropriate names for each type (cf. Figure 2). As for any typology, one could argue about the suitability of the wording. The six names proposed here are the result of discussions on the research material and are certainly open to criticism.

Of course, similar to Blum (2014), Siebert et al. (1956), and Hallin and Mancini (2004), the typology’s first aim is to bring order to the abundance of national mass media systems. A type represents a group of states that share certain mass media characteristics. This definition leads directly to the main objection to using typologies at all. Based on the specifications of the dimensions, the researcher decides on the order that he or she gets as a result. Put differently, every typology contains an element of arbitrariness. However, the two dimensions used here fit the study’s basic assumptions and the research design. There is a second obvious counterargument. Even after a very intense briefing, graduate students do not become full specialists for five or six different countries. In addition, a single researcher cannot be familiar with all the details of 46 media regulation regimes. This is why Hallin

and Mancini (2012), for example, asked leading researchers to write about their respective countries. This particular book, nevertheless, demonstrates the downside of this approach—that is, national lenses that range from a great deal of understanding concerning certain limitations of mass media freedom to open political PR. Using a category system based on Giddens, the present study is committed to neutrality and transparency and waives any ranking or judgement.

Results: Mass Media System Typology

As mentioned at the beginning of this paper, all governments are interested in steering the public information and opinion-forming stages, as this enables them to maintain power. However, there are differences in how they implement their interest in legislation (rules) and mass media structures, such as ownership, financing, training, or media-related authorities (resources). On the one hand, as the data show, some nation-states constitutionally define the media's mission, while some do not. In the nation-states that are examined here, at the level of rules, there are various kinds of formal expectations toward the mass media, including the promotion of ideology (communism), religion (e.g., Iran), national unity (e.g., Indonesia and Singapore), and harmony (e.g., Rwanda, where all terms related to the genocide are taboo). Regardless of the specific mission that journalists have to fulfill, in these countries, the profession's "loyalty to the public" is limited (Lauk and Harro-Loit, 2017, p. 1960).

On the other hand, once again, based on the review of all the research material, even in countries in which such a mission is not defined in the constitution or in common law and practice, the nation-state has numerous opportunities to restrict media freedom by doing the following:

- acting as media owner, advertiser, subscriber, and purchaser;
- acting as a customer of infrastructure measures (via conglomeration);
- acting as an accomplice of the military and security forces; and
- defining taboos (such as threats to national security or pornography).

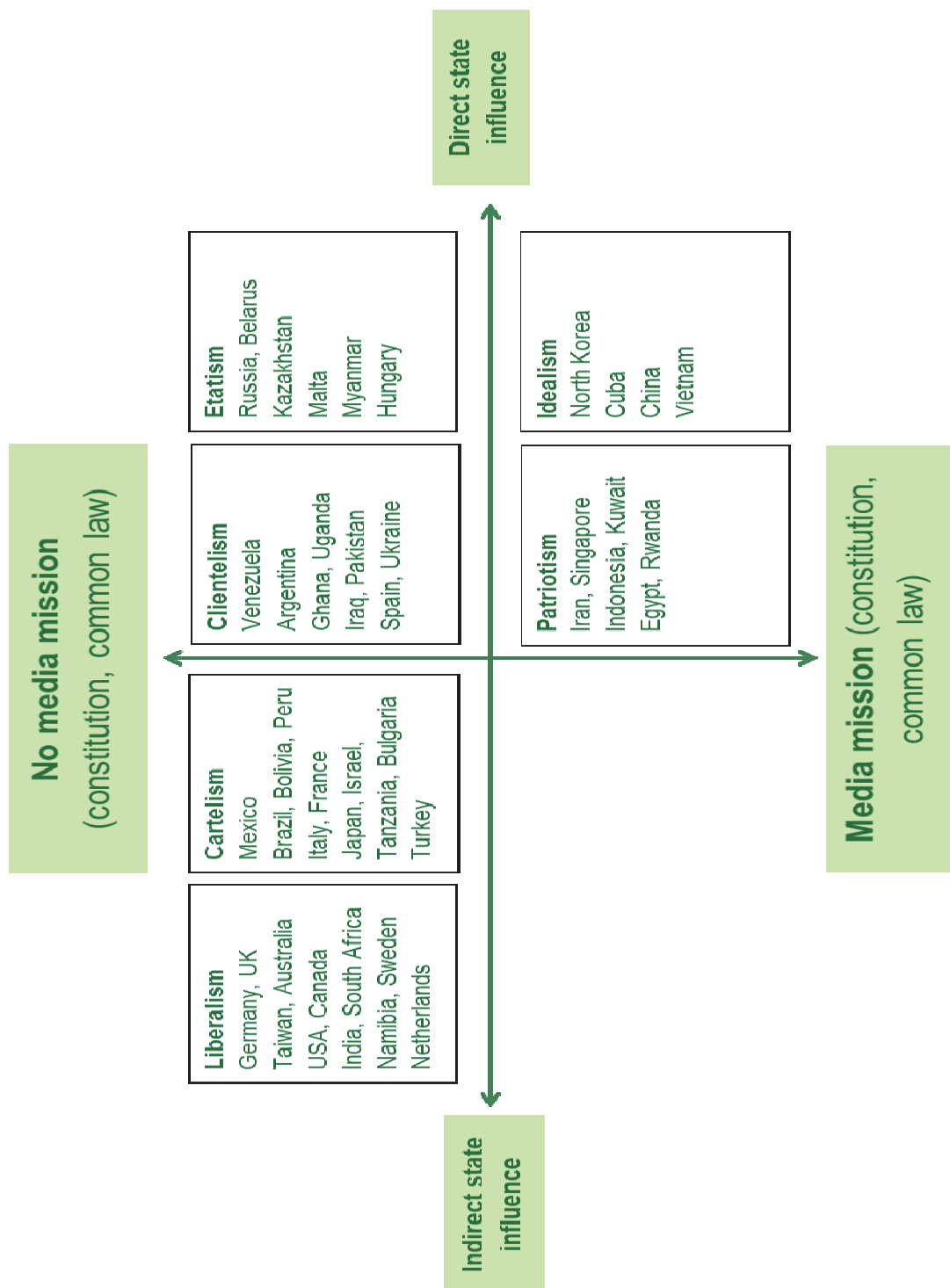
In the typology that is presented here, these gateways to mass media used by the state are grouped from direct (state ownership or near-ownership of mass media or transmitters and license requirements) to indirect (state-sponsored journalism training, government PR, license fees, rules of advertising, and so on). In Figure 2, the x-axis detects state influences that extend beyond formal expectations. Concisely, the more to the right, the more direct the state's influence. Because the indirect gateways to media content are also used in countries that are located to the right, less autonomy defined as "independence from external pressures" (Lauk and Harro-Loit, 2017, p. 1960) is more likely than in countries on the left-hand side of the figure.

Even countries with a predefined constitutional or common law principle that determines the functions that the mass media should fulfill differ in this way (at the levels of resources and agents, as Giddens would say). In Iran, Egypt, and Singapore, for example, there are private media outlets. In addition, the citizens in these countries—theoretically and, in most parts, even practically—receive foreign media, even though there are licenses required and many other kinds of restrictions. Despite all the restrictions on the media, the countries assigned to the patriotism type are different from Cuba, China, Vietnam, and North Korea (idealism), where the ruling communist parties and their subordinates own all the media. According to a documentary filmmaker who travelled throughout North Korea professionally in 2014, the inhabitants of the country have no clue what the world beyond their national borders might look like. He stated that, “On TV, they just get homegrown military movies, political news praising the dynasty founded by Kim Il-Sung, domestic sports, and soap operas.”

To prevent any misinterpretation of this typology, the grouping of countries—such as Germany and Namibia or, to take another example, Spain, Ghana, and Pakistan—does just mean what the two typology criteria are all about. Neither Germany nor Namibia has a media mission in its constitution. Furthermore, the state’s gateways to media content are rather indirect in both countries—at least less direct than in cartel or clientel countries. Whether there are other features that are common to all liberal countries—for example, in terms of the journalism culture and mass media markets or traditions—is an open question. If such similarities exist, like in any other cluster analysis, those shared variables are considered factors that influence journalists’ autonomy.

Before undertaking an in-depth examination of the six types of mass media systems presented in Figure 2, it is important to address two more points. First, in each type, there is considerable variance among the assigned countries. In addition, in some cases, such as Germany or Sweden, the names of the types are contrary to the labels that are evident in literature; however, they are still more suitable than any other term when it comes to illustrating the common ground shared by all the countries that belong to one type. Second, both typology dimensions fit the two elements of Giddens’ term structure. The media mission is situated at the level of rules and the state’s influence at the level of resources.

Figure 2: Mass media system typology



Idealism and Patriotism

Beginning at the level of formal expectations (rules), even in the Soviet Union and the German Democratic Republic, which disappeared with the fall of the Berlin wall, the constitution granted press freedom. However, ideology defined what the media were all about back then (Fiedler, 2014). Today, it is still quite similar in China, North Korea, Cuba, and Vietnam (communism), which belong to the ideal-

ism type, as well as in the patriotism states, Iran (theocracy), Kuwait and Egypt (religion, too), Rwanda, Indonesia, and Singapore, which has five shared national values that were introduced by the government in 1991. With the aim of strengthening national identity, Singaporeans are encouraged to value the nation above the community and the society above the self. The other four “shared values” are “family as the basic unit of society,” “community support and respect for the individual,” “consensus not conflict,” and “racial and religious harmony” (Singapore, 1991). The expert interviews established that these requirements are not merely on paper; rather, according to Aaron Ng from the National University, “Singaporeans in general do practice the shared values.” He also stated that “it is pretty much in the cultural makeup of Singaporeans, especially the parts on religious and racial harmony and family as the basic unit of society.” Journalists are no exception. This is because, based on this background of shared values, the regime legitimizes rigid media laws. To quote Aaron Ng: “Local journalists are usually very careful about reporting on race and religion. Of course, one of the main reasons is that we have very tough laws on anyone who causes or can potentially cause racial unrest through words.” The five values have a major impact on journalists’ social position and their role perceptions. “Singapore’s journalists are circumspect about where the press stands in relation to the state and society. Most do not see their profession as the Fourth Estate or adversary of government” (George and Xiaoming, 2012, p. 101).

The patriotism type can be illustrated using a second case: In the constitution of the Islamic Republic of Iran, the basic elements of Islam limit freedom of opinion in mass media. This approach is already clear from the constitution’s preamble, which states specifically that the media has to disseminate Islamic culture. Although the country has ratified the UN social and civil pacts emphasizing that freedom of expression throughout the world is a universal right, the press law requires journalists, for example, to support politics and state and to fight luxury, immorality, and lavishness. “Some subject matters, such as criticism of the Revolutionary Leader or insulting the Prophet Muhammad, are certainly taboo,” said Marcus Michaelsen, a scholar in political science, communication, and Islam. Similar to Singapore, a range of authorities monitors compliance with the guiding principles.

However, the fact that religious, national, and communist ideologies steer mass media content does not mean that there are absolutely no guiding principles in all the countries listed in the upper part of Figure 2. If constitution and media law do not contain specific restrictions on the media nor specify the achievement of certain goals, the legal framework obviously follows the ideology of liberalism.

Etatism

The figure’s upper part depicts countries in which the press has no formal attachment to any guiding principles; however, there are mass media systems in which the state and its associates are the primary contractors. Based on the sample, this is especially true for the following countries:

- Belarus and Kazakhstan, where state and Russian media (mainly also state-owned) have been dominating the landscape since the fall of the Soviet Union;
- Russia itself;
- Hungary, where the ruling Conservative party very recently changed ownership structures in favor of the government, with wealthy supporters either taking over existing outlets or setting up new ones; pushed back foreign media companies; and shut down the leading oppositional newspaper;
- Myanmar, with its dominant state-owned newspapers and broadcasters, as well as the government's power in the licensing process and unfair financial setups for non-state-owned media; and
- Malta, where the church and the two major parties that make up the state run most of the press and television companies.

With just 400,000 inhabitants, the mini state Malta does not allow for commercial outlets. According to the interviewed experts, journalists in Malta are party officials rather than researchers and critics. “When hiring new staff, party affiliation is more important than journalistic skills,” said Malcolm Naudi from the Institute of Maltese Journalists. In Belarus, there are commercial media; however, similar to Myanmar, the state owns all the influential outlets. Jekaterina Tkatschenko, who works for a television station based in Warsaw, Poland, called the respective programs “propaganda,” stating that “they just justify the government’s decisions.” The major state-owned media profit from tax exemptions, and Belarus authorities have to subscribe to state-owned papers. In addition, the main press deliverer and television transmitters are state owned.

Clientelism

Moving a bit leftward in Figure 2, introducing commercial media does not automatically mean decreasing state influence. Although there is a vivid media market in Venezuela, for example, the most important client advertiser is the Venezuelan state because the oil industry is 100 percent state owned. Uganda is another prime example of the clientelism type, where the states have numerous possibilities to influence media content (as the owner, the major advertiser, and the employer of the police and the courts). At first glance, regarding the matter of press freedom, President Museveni, who came to power in 1986, has been one of the Western world’s prize pupils for quite a long time. Under Museveni’s leadership, Uganda was quick to sign the 1991 Windhoek Declaration on Press Freedom. The country’s broadcast sector was liberalized as early as 1993. Today, besides the officially public but state-controlled media, there are numerous privately owned radio stations, a commercial television, two English language dailies operating independently of the state (*Daily Monitor* and *Red Pepper*), and media regulation authorities, which arguably ensure that the media are held accountable for their actions. Consistent with these constellations of actors is the considerable appreciation for Western journalism concepts (cf. Mwesige, 2004).

However, there are many reports on interference in journalists' autonomy (Meyen, Fiedler, and Schamberger, 2016). The expert interviews revealed that the president's influence is based on informal rules, which are rooted in the natural context (climate and topography). Ugandans' awareness of the importance of media freedom is (still) rather weak. Put differently, the press is not at the top of the hierarchy of values; this position is occupied by jobs, security, and health. As Peter Mwesige, who heads the African Centre for Media Excellence, put it, a related problem "is the lack of media literacy." He also stated that "many people don't know if it is good or bad that a newspaper is shut down. They don't see that brown envelopes are corruption, because they think they have to pay the journalists for their opinions being published."

Because the government and the governed, nevertheless, share a profound belief in media power, journalists are considered a risk rather than a chance. John Nagenda, a senior presidential adviser, called the *Daily Monitor* his "enemy" because it had four or five journalists "who never say something good about the government." According to Nagenda, Museveni himself writes letters to the editor. On the day of the interview, the state-controlled daily *New Vision*, for example, printed a long Museveni piece about homosexuality without equivocation. It is not surprising, then, that many of the journalists who were interviewed regard the president as taboo. "He has said himself, 'If you attack my family, then there is no compromise,'" said a television news editor. In addition, the editor mentioned the military, the army, and national security, "because we have all these threats like Al-Shabbab or South Sudan." Looking at the constellations of actors, the climate of opinion, which is conducive to interventions in media freedom, provides the government with the best conditions for limiting journalists' autonomy and the unequal spreading of media ownership and resources. For the very same reason, advertising clients (including the government) can obviously exert influence on media enterprises. Although the dominant role perception of Ugandan journalists coincides with that of Western models (Mwesige, 2004, p. 69), local (formal and informal) rules, resources, and actor constellations prevent the mass media from investigating official claims and being 'the voice of the voiceless.'

The assignment of Iraq and Pakistan (two vibrant markets with partisan media, difficult security situations, and bribery), as well as most sub-Saharan African (Ghana) and Latin American countries, such as Argentina or Bolivia (with their elite networks in politics, administration, military, police, and the media) to the clientelism type is not controversial. However, Spain's inclusion in this group may be surprising. Following Hallin and Mancini (2004), political partisanship, high political parallelism, and influential parties are attributes of the Spanish mass media system. Because of both the lack of liberal structures and a slowly developing commercial market, the media is "dependent on the state, political parties, the church, or wealthy private patrons" (Hallin and Mancini, 2004, p. 103). Despite the economically triggered, sustained process of mass media concentration, there are still strong diverse actors who have their own interests, such as the Catalan

press. Therefore, in the typology presented here, Spain is a clientelist country that has tendencies that are in keeping with cartelism. To a certain extent, Peru is a counterpart of Spain. Due to its high media concentration and its rather indirect political influence (via close ties to media moguls, licensing, and the personal intervention of politicians), Peru was placed in the cartelism group. However, as in the clientelism group, Peruvian journalists are vulnerable to corruption and face arbitrary justice that is made possible by vaguely worded legislation. Therefore, as in other mass media system typologies, the boundaries between the types are fluid.

Cartelism

In cartelist mass media systems, the state is not involved as the principal owner, major advertiser, subscriber, or purchaser. This is mainly because of the economic power of the countries that belong to this type. In Turkey or Mexico, for example, there are numerous potential ad clients, which, on the surface, may not be part of the state's sphere of influence. However, upon taking a closer look at the market structures, it becomes apparent that in both countries, two affiliated groups dominate the media. Even more importantly, these companies engage in more than merely media activities. The Turkish trust Doğan, for example, is involved in road construction, petrol stations, and tourism. This is how the state as the major principal of infrastructure measures came in despite media freedom on paper and despite a private, commercial mass media market; this occurred long before President Erdogan started to ban opposition newspapers; jail independent journalists; and, in doing so, push his country toward the etatism or patriotism types. In Mexico, where government ads are more important than in Turkey, people think of journalists as corrupt and view them as the servants of whoever pays them. "When journalists disappear or have been assassinated, there is no public outrage," said Eileen Truax, who works as a freelancer and author. "People think these journalists deserve it." According to cultural journalist Concepción Morena, the perception of *TV Azteca* and *Televisa* as government mouthpieces persists to this day.

In other cartelist countries, such as Brazil, Peru, Israel and Italy, the media market structures and the "combination of political power and media conglomerates" (Ragnedda, 2014, p. 14) are quite similar. In France, in addition to state subsidies, the strong involvement of investors from other branches, such as the aerospace or building industries, is a special feature of the media. Japan differs slightly due to its press club system, which involves close relationships between journalists and government or industry officials and which divides the media market into inside (participating) and outside (non-participating) media. The inside media outlets benefit from exclusive press club information, which, in exchange, leads to uncritical reporting against the authorities. Furthermore, many Japanese journalists refrain from critical reporting due to the principles of neutrality (*fuhen futo*) and harmony (*Confucianism*). As a result, the Japanese "media can be understood as collaborators with the state in the management of society" (Freeman, 2000, p. 162).

Liberalism

In liberal media systems (see the upper left part of Figure 2), state influence is even more indirect than in countries belonging to the clientelism and cartelism categories. As a rule, and despite the number of exceptions covered in this study too (e.g. Malta, Italy, France, Spain, Israel, or Hungary), the liberal type is located in the prosperous Western world, which appreciates liberal values, can look back at a long tradition of media freedom and of hosting strong commercial and public service media, and concentrates primarily on content production. A discussion about the literature on “manufacturing consent” in market-driven mass media systems promoting democracy as the system of rule (Herman and Chomsky, 1988) is beyond the scope of this paper; however, it should be clear how, under these circumstances, the elites infiltrate mass media content through think tanks, PR campaigns, journalism training or background discussions, informal meetings, and networks (Krüger, 2015).

However, unlike all the other mass media system types that were previously discussed, in the countries belonging to the liberal category, direct state intervention would be discussed and combated in public. Outside the Western hemisphere, liberal mass media systems are likely to be extremely rare; in the present sample, these are Taiwan, India, South Africa, and Namibia. Taiwan is a special case, as it is seen as the freest media system in Asia with “one of the most competitive media markets in the world” (Wang, 2014, pp. 161-2). However, the indirect Chinese influence via strong investments in the media market should also be taken into account when discussing Taiwan’s media freedom. Regarding the latter three countries, both prosperous urban elites who expect to receive information from independent sources, as well as the British role model, can explain this. “The media in Namibia play a very important role in terms of checks and balances and the watchdog role,” said Robin Tyson, lecturer in communication studies at the University of Namibia and former manager of the Namibian Broadcasting Corporation (NBC). “We haven’t any intimidation. We do not have situations where journalists get arrested. In addition, we are self-regulatory. We have a media ombudsman who is an independent person. People who have complaints can contact him.”

Nevertheless, both Namibia’s media market structures and its political culture are different from those of other liberal countries. NBC’s major funding source is an annual state subsidy, and the company’s leadership is a council appointed by the information minister. The 1991 Namibian Broadcasting Act and the broadcaster’s mandate have to date prevented the abuse of these structures of constellations; however, first, NBC is the major source of information, particularly for individuals in rural and peripheral areas. Second, the very same party has easily won all elections since independence. “There is some backlash,” said Robin Tyson in December 2014. “The ruling party, SWAPO, has mentioned, that they want to ban Facebook, which is going to be virtually impossible. But you can see that they are worried about the influence that Facebook has. They are worried maybe about the free open conversation that people have on Facebook.” In this respect, it is important to remember that media freedom is even contested in liberal countries.

Conclusion: What or Who Decides on Journalists' Autonomy?

First, the mass media system typology presented in Figure 2 differs from press freedom rankings by NGOs, such as Freedom House. In other words, there is no judgement; rather, there are differences in how governments and states steer and control public communication channels to serve their own interests. Apart from organizing the multitude of national mass media systems, the most important aim of the typology is to address the question of influencing factors. What are the threats to and conditions of journalists' autonomy? Or, using the terminology of qualitative research methodology and extending beyond the two dimensions grounded in Giddens' terminology (i.e., typology is based on rules [media mission] and resources [state influence or near-influence]), what are the further variables shared by countries that belong to a certain type? Using the typology as presented above as an analytical tool similar to cluster analysis, I looked for further characteristics shared by the different types. To ensure traceability and to avoid repetitions, in each case I refer to the mass media system type(s) the respective influencing factors are based on.

Most obviously, at the level of codified rules, media freedom requires the waiving of a guiding principle in the constitution or in media law.

- First, in the patriotism and idealism categories, state ideology strongly restricts journalists' autonomy.
- Second, laws ensuring media freedom exist only on paper until the state can exercise its monopoly on power and the rule of law (social and political context). In some countries belonging to the cartelism and clientelism types (e.g., Mexico, Pakistan, Iraq, and Uganda), this is not the case, or if it is, there are major reservations. In Pakistan, for example, the military and secret service define taboos, block reporting on whole regions, and even kill defiant journalists, but they never receive any punishment.
- Third, in both media system types, at the level of allocative resources, media financing, and closely related to financing, market structures and low wages are the main gateways for state influence on media content. This is also true for countries of the etatism type, where the state or major political actors even own the most important outlets.
- Fourth, the example of Pakistan illustrates that weak national identities, wars, and disputed borders facilitate restrictions on journalists' autonomy (social and political context). Again, a discussion of the current political situation and the state of nation building in Turkey, Russia, Belarus, Malta, Uganda, Rwanda, Israel, or Singapore is beyond the scope of this study; however, it is obvious that ruling and fighting powers legitimize taboos, editorial sanctions and interventions, and even attacks on journalists in the name of national security and national interests.
- Fifth, knowing that the police or the secret service are able to harass them with impunity, journalists are very careful, especially if there is no aware-

ness of the importance of journalism in the specific country (social context and informal rules). At the level of authoritative resources, primarily in clientelism and cartelism mass media systems, the lack of public pressure against violations of journalists' autonomy strengthens the ruling powers.

At this point, it seems important to highlight the link between society's expectations, rules (media laws), allocative resources (media ownership), authoritative resources (media regulation authorities), as well as the influential possibilities of politics and the economy. In Uganda, for example, many of the journalists and media activists who were interviewed complained about the ownership structures. The vast majority of commercial and state-independent outlets belong to politicians who are closely tied to the ruling party (the NRM) or religious leadership. Some journalists are even on the payrolls of politicians. In this African country, a second type of ownership is solely commercially oriented. "Those people are not interested in informing the people," said a rural radio journalist. "For them, it's just a business opportunity. That's why the ad industry is affecting us." The consequences of commercially oriented ownership are self-censorship, a dependent media landscape, and authorities that feel encouraged to extend their competencies (Meyen, Fiedler, and Schamberger, 2016).

Again, as seen through Giddens' lens, the main reasons for the lack of journalists' autonomy and media freedom are informal rules and the social context. More concretely, in countries outside the liberal, patriotism, and idealism types, journalists' working conditions and, related to this and even more importantly, the perceptions that the ruling elites, the public administrations, and the governed have of journalists limit media freedom and journalists' autonomy. Particularly in clientelist and cartelism mass media systems, it is precisely the media's relative societal position and related resources that allow ruling elites to implement systems of media laws and media regulation authorities that create arbitrariness and, therefore, a feeling of insecurity within the profession. In addition, the people who are in power also know about Western expectations of journalism and mass media. They may pay lip service to the principles of freedom and even sign respective laws and international declarations; however, without public pressure, deriving from the tradition of press freedom, personal experience, and media literacy, journalists who criticize those in power will continue to face serious threats. This applies not only to opposition journalists in countries assigned to the patriotism and idealism types but also to their colleagues who work in countries with no constitutional principles that determine the functions that are beyond the critique and control of those in power.

Comparing liberal mass media systems with the five other types—besides a socially shared conviction that journalists' autonomy is important, as well as international observation and journalistic professionalization—the conditions of media freedom are a healthy advertising market and a low media concentration that excludes other businesses. Looking at both decreasing ad revenues and competition from social

media, media policymakers face a twofold task. On the one hand, they have to defend the ideals of media freedom and journalists' autonomy and, in this way, strengthen the media's societal position all over the world. On the other hand, as an examination of the cartel and clientelist countries reveals, autonomous journalists need to be financed without any interest other than the public good.

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