

FINLAND: PREPARED FOR CHALLENGES AHEAD

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Historically, journalistic self-regulation in Finland has evolved in three phases that are closely connected with developments in journalistic professionalism: early attempts until the late 1960s, institutionalization and solidification from the late 1960s to the mid-2000s, and the current phase of constant change. In the current phase, the self-regulatory institution – the Council for Mass Media (CMM) – was initially struggling to find its place in the changing mediascape. However, in the last ten years, it has been able to re-adjust itself and gain a relatively secure position in society. This position is likely to be increasingly challenged in the coming years by the many ongoing transformations of communications and journalism, but the CMM appears rather well placed to meet the future challenges.

Finland is known for its press freedom. For years, the Northern European country of 5.5 million people has occupied one of the top spots in the World Press Freedom Index (RSF, 2021). One of the key elements behind this achievement is the system of institutional journalistic self-regulation. Its history officially dates back to 1968 and the founding of the self-regulatory organ, the Council for Mass Media (CMM). However, the roots of the system go back almost 50 years more to the early years of the nation. In this article, I will first outline a brief history of institutional self-regulation in Finland from the 1920s

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to this century before focusing more thoroughly on developments in the last ten years to illustrate a picture of the status quo. Finally, I will discuss some future challenges for institutional self-regulation.

1. History of the Finnish self-regulation system

Developments in self-regulation in Finland can be divided into three eras. These eras are closely connected to the developments of journalistic professionalism, relations between media and politics, and relations between media and the market.

1.1. Early attempts (1920s-1968)

Questions of self-regulation became topical in Finnish journalism in the 1920s for two reasons. First, Finland's independence in 1917, the civil war in 1918, and the 1919 constitution that put an end to censorship led to considerations of the place and role of journalism in society. Secondly, the rapid growth of the press, which had started in the late 19th century under the Russian rule (Tommila *et al.*, 1988), and fledgling professionalization among journalists (Pietilä, 2012, pp. 188-193) fuelled talk about ethics, professional rights, and responsibilities.

Finnish press was highly partisan (Leino-Kaukiainen, 2018), but in the changing circumstances, ideas of the press as an independent mediator of common interest emerged (Pietilä, 2012, p. 194). Journalists began to strive for more freedom from political parties' aims and publishers' economical imperatives (Salokangas, 1987). The first politically non-partisan trade union for journalists, the Union of Newspapermen in Finland (UNF), was founded in 1921. An early self-regulatory organ, the Newspapers' Honorary Court (NHC), was established by the UNF in 1927. It followed the example of neighbouring Sweden's *Pressens Opinionsnämnd* founded in 1916 (Mäntylä, 2008, p. 30).

These actions had little impact, however. Most newspapers were unionized on a party-political basis, so parties and publishers wielded power over journalists and solving many questions of journalistic freedoms and responsibilities proved difficult (Leino-Kaukiainen, 2018). The UNF's attempts to improve professionalization were poor (Salokangas, 1987, p. 362), and ethical questions were not at the heart of its agenda. Instead, the union focused on improving journalists' salaries (Leino-Kaukiainen, 2018, p. 183). The NHC did not help much with ethics either. In contrast to Sweden, publishers did not join the

organ that processed complaints made by journalists only. In addition to its limited reach, the NHC was ineffective. It convened sporadically, party-political disputes marred its work, and it did not publish an official ethical code (Mäntylä, 2008, pp. 38-39).

In the post-World War II period, political parties' grip over the press loosened gradually, and the UNF's status and reach improved. Ethical questions and self-regulation progressed slowly though (Leino-Kaukiainen, 2018). The union published the first ethical code for journalists in 1957, which served as an indication of things to come. Self-regulation and ethics began to draw greater attention in the 1960s when Finnish society and media were transformed. Many newspapers increased distance to political parties by declaring themselves independent (Nord, 2008, p. 103) and journalistic professionalization took strides forward (Koljonen, 2013, pp. 105-107). The breakthroughs of television and especially the yellow press generated worry about journalistic ethics and misuse of freedom of press. Consequently, members of the parliament started to think of ways to improve citizens' privacy and to curb journalistic excesses (Mäntylä, 2008, p. 40; Leino-Kaukiainen, 2018, pp. 189-191).

1.2. Institutionalization and solidification

It is against this backdrop of increasing professionalization, commercialization, and political pressure that institutional self-regulation emerged. After attempts to revive the NHC in the early 1960s failed, the UNF began to formulate a more comprehensive system of self-regulation to build trust in journalism and avoid looming government regulation (Leino-Kaukiainen, 2018, pp. 190-192). Wary of state intervention, publishers lent their support to the idea (Mäntylä, 2008, p. 41). The public service broadcaster YLE also followed suit although it already had its own ethical code (Leino-Kaukiainen, 2018, p. 192). In 1968, they created a new self-regulatory organ, the Council for Mass Media (CMM). It became probably the first *media* council in the world (T. Vuortama & Kerosuo, 2004, p. 112) as the press, radio, and television all featured in its set-up. At the time, self-regulatory organs elsewhere were decidedly *press* councils only (Leino-Kaukiainen, 2018, p. 192).

The CMM was designed to meet the demands of the time with a two-pronged strategy. The first prong of building trust was modelled after the examples of the Swedish and British press councils and based

on profession-led inclusivity. Membership in the association behind the CMM was limited to professional journalistic unions, umbrella organizations of media outlets, and individual media outlets, but everyone could file complaints. The council dealing with the complaints had equal quotas for journalist, publisher, and audience members. Audience members were selected by journalist and publisher members. The council also employed experts from different fields to assist in the handling of certain cases (Leino-Kaukiainen, 2018, pp. 191-193). The chair of the council could not be a publisher or a journalist (Heinonen, 1995, p. 134). It became customary to choose an expert in law as chairperson.

The second prong of maintaining distance to the state was explicated carefully. The association's first basic agreement states that the CMM is not a statutory authority or a court; it cultivates responsible freedom in regard to the mass media and provides support for good journalistic practice by interpreting journalistic rights and responsibilities (Leino-Kaukiainen, 2018, p. 192). The tasks of legal regulation and self-regulation were also thoroughly explained in the new ethical code formulated by the UNF, the Guidelines for Newspapermen (GN, 1968). Moreover, the CMM did not apply for state subsidies but started work with member organizations' funding only (Leino-Kaukiainen, 2018, p. 192).

However, membership fees were not sufficient, and the association soon ran into financial difficulties. The problem was eventually solved according to the Finnish tradition of a democratic corporatist media system (Hallin & Mancini, 2004): the state began supporting the association financially through the Ministry of Justice but allowed it great autonomy. The annual state subsidy, which covered 50% of the CMM's expenses in 1971-1985 and continued later with a smaller proportion (Väntinen, 2018, pp. 264-265), enabled the association to establish itself. Simultaneously, the expansion of the UNF as an umbrella trade union for all journalists from the 1970s onwards (Riskä-Campbell, 2018, pp. 206-219) and the growing reach of the media helped the association gain new members and strengthen its status nationally (Mäntylä, 2008, p. 43).

Its financial background secured, the CMM was able to focus on solidifying its position. With revisions of the GN in 1976 and 1983, the ethical code and its ideas of journalistic autonomy, relaying truthful information, and working in the public interest became the cornerstones of journalistic ethics in Finland (T. Vuortama, 1984, pp. 44-45; Mäntylä, 2004, pp. 134-137). The publication of the 1983 edition was

preceded by intensive consultation among journalists, which enhanced the CMM's status (T. Vuortama, 1984). Individual council members' activities in spreading awareness about journalistic ethics had a similar effect among professionals and in journalism education (Koljonen, 2013, pp. 118-119). Following these efforts, individual media outlets' actions, such as newspapers' mission papers (Lehto, 2006), only had a complementary role to the GN. The CMM's status among the general public also improved (J. Vuortama, 2003, pp. 48-49).

The developments enabled the CMM to enjoy a period of stability, which coincided with the heyday of professionalization of journalism in Finland (Koljonen, 2013, pp. 115-119, 135). However, since the 1990s, transformations in society and the media have slowly increased pressure on the profession and on the CMM to change. Issues related to the liberalization of the democratic corporatist media system (Hallin & Mancini, 2004, pp. 251-295) – for instance, commercialization (Koljonen, 2013, pp. 124-127) – and the growing impact of technology (Mäntylä, 2004, pp. 137-138) have come to the fore. Until the early 2000s, however, they had minor impact on the CMM. The self-regulatory system continued to enjoy broad support among journalists and helped them maintain professionalism (Mäntylä, 2004, pp. 135, 140). The ethical code was slightly revised in 1992 and its name was changed to Guidelines for Journalists (GJ) to account for changes in the profession. Notably, at this point, the idea of public interest was removed from the code as an inkling of what was to follow (Mäntylä, 2008, p. 192).

1.3. Constant change (from mid-2000s onwards)

By the mid-2000s, pressures on the CMM and GJ had grown. Critique of the quality of the council's work emerged from both within and outside of the association (J. Vuortama, 2003, pp. 51-52). In the association, it was felt that the council's reactive complaint-based approach was no longer an optimal solution for self-regulation in the fast-paced media environment. A more proactive and flexible style was needed. Publishers demanded that the Union of Journalists (UJ, former UNF which had changed its name in 1993) relinquish its privilege and enable broader participation in the formulation of the GJ (Vänttinen, 2018, pp. 265-266). A revision to the GJ was due, not least because courts had started using council decisions to motivate their verdicts since the late 1990s. It had blurred the boundary between self-regulation and the

judicial system and caused concern among journalists and publishers (Mäntylä, 2008, pp. 193-194).

Two major developments followed. First, there was turmoil over reforms, with the main questions concerning the position of the chairperson and the possibility of electing a journalist as chair. A solution was ultimately reached in 2007 when the association's member organizations overrode the council and decided that a journalist be installed as chairperson, who was also given a more prominent role. To reflect the elevated status, the position of responsibility was transformed into a part-time job. Thus, the chairperson became more of a Swedish-style media ombudsman in practice (Vänttinen, 2018, pp. 265-267).

Secondly, broader participation was allowed in the formulation of the new GJ in 2005 (Mäntylä & Karilainen, 2008, p. 29). These guidelines marked the beginning of a new era, in which the profession's need to protect its position in a changing environment (Riska-Campbell, 2018, p. 269) and the increasing impact of commercialization were visible. Earlier references to democracy, human rights, and other points of general interest were removed from the GJ altogether. Another important aspect of previous ethical codes – a strict adherence to relaying truthful information as the foundation of good journalistic practice – was no longer highlighted, and the publication of news items based on limited information was also accepted. Journalistic autonomy was mentioned less pronouncedly; instead, the guidelines paid greater attention to publishers' and owners' (financial) concerns, questions of privacy, and individuals' rights. The GJ also explicated the ethical code's position as a tool for self-regulation only (Mäntylä, 2008, pp. 192-197).

However, turbulence did not end there – quite the opposite. The state of journalistic ethics and the position of CMM were questioned by the public and academics (e.g., Raittila *et al.*, 2008, pp. 166-188; Kempainen, 2007). In 2009, internal debate in the council about a YLE documentary accusing the then-Prime Minister of corruption resulted in the resignation of the first journalistic chairperson (UJF, 2009) and plenty of bad publicity. Further changes were needed, and the 2010s can be regarded as a decade of attempts to steady the position of the CMM and improve the status of self-regulation. As the CMM chairperson, renowned journalist Risto Uimonen noted about his time in charge of the association in 2010-2015: "Continuous reform became an established way of working at the CMM" (CMM, 2015, p. 3). In short, general pressures on journalism to rethink itself (Peters & Broersma, 2013)

became also evident in self-regulation. The following section outlines the main reforms in the 2010s and illustrates the status quo of the CMM.

2. Current state of the self-regulatory system

In the reform process, the main changes have taken place in the CMM's structure and organization, the ethical code and complaints process, and the association's communications efforts.

2.1. Structure and organization

Even amidst the turbulence, the basic tenets of the CMM from 1968 still stand. The association is committed to defending and promoting good journalistic practice as well as cultivating responsible use of press freedom. It has not featured in any national laws or regulations. On this front, there is no indication of change in sight. Understandably, the association does not want it. In the last decade or so, several Ministers of Justice have also stated that the self-regulatory system has the support of the state as it is (e.g., Lehtola, 2016, p. 2; CMM, 2015, p. 3).

Membership in the association has remained possible for journalist unions or organizations, umbrella organizations of media outlets, and individual outlets. Currently, there are eight institutional members in the first two groups, including the likes of the UJ, publishers' trade association News Media Finland, and YLE. Through them, journalists in over 900 outlets across the country are connected to the CMM. Sixteen individual media outlets complete the list of members. In the 2010s, membership in the third group has increased as new non-unionized outlets have joined the association (Nenne Hallman, CMM secretary, personal communication, September 7, 2021). As an invention, the CMM has reached out to expand its membership. Since 2011, student media from three journalism schools in Finland have also been accepted as members (CMM, 2019, p. 14). Overall, most journalists and journalism students in the country have thus committed to the CMM and the ethical code.

In the council, tripartite representation from journalists, publishers, and audiences remains. The council's size has grown from 12 (chair + 7 industry members + 4 audience members) to 14 (chair + 8 industry members + 5 audience members). Since 2008, journalists have occupied the position of chairperson, whose term has been extended. Currently, the chairperson can serve a maximum of two consecutive

five-year terms. Industry members come from the association's member organizations, and together with the chairperson, they select the audience members from applicants of public calls introduced in 2010. All members are selected for a three-year term, which can be extended by one or two years to ensure continuity in the council's decision-making (CMM, 2020b, Sections 6-7; CMM, 2021a; Eero Hyvönen, CMM chairperson, personal communication, August 11, 2021).

These changes are part of a larger systematization and professionalization drive at the CMM. The council's chairperson became a full-time employee in 2016, and the number of administrative and management support staff has been increased to help run the CMM (CMM, 2021a). In the last ten years, their number has doubled from two to four full-time employees (Ilkka Vääntinen, long-term CMM active, personal communication, September 6, 2021).

Professionalization has increased operational costs. Since 2010, the CMM's annual budget has almost doubled (CMM, 2021a). In 2020, the budget was €459,000, with most of the income from institutional members' membership fees (CMM, 2020a, p. 18). State subsidies still play an important part, although initially in the 2010s, the state's proportion of funding was gradually reduced to around 20% of the budget as operational costs increased and state subsidies remained stable (CMM, 2021a). Since the CMM's 50th anniversary in 2018, the state has enlarged its subsidies for the association (CMM, 2021a), somewhat against its general media policy that has been increasingly market-oriented (Ala-Fossi, 2020). The €135,000 subsidy in 2020 covered about 30% of the association's budget (CMM, 2020a, p. 18).

To secure and develop its operations, the association has increased its attempts to gain external funding. Such efforts have become a staple part of the CMM's repertoire since the chairperson's position became a full-time job (CMM, 2018, p. 3). The CMM has been able to secure foundation funding for a variety of different purposes – for instance, €120,000 for arranging the CMM's 50th anniversary events (CMM, 2018, pp. 23-25) – and EU funding with other European media councils to develop self-regulation in the digital age (CMM, 2019, p. 12; CMM, 2020a, p. 18). In the last few years, external funding has helped stabilize the economy of the association along with the COVID pandemic that has reduced operational costs (CMM, 2020a, p. 18).

2.2. Ethical code and complaint processes

Another key area of development in the last decade has been the GJ, which have been revised in 2011 and 2014. Revisions to the ethical code have mainly reflected the increasing importance of online reporting and the growing need for transparency in journalism (e.g., Meier, 2009; Phillips, 2010). The latest changes have clarified earlier policies on the use of anonymous sources in reporting (GJ, 2011, Section 14), considerate behaviour towards sources in sensitive cases such as crime and accidents (GJ, 2011, Section 28), and error correction (GJ, 2011, Section 20; GJ, 2014, Section 20). New sections have not been added to the code to regulate journalistic content, but in the 2014 revision, an annex was added outlining the application of user-generated content on journalistic media websites.

In a break from previous practice (cf. Mäntylä, 2004, pp. 143-144), throughout the 2010s the CMM has also issued statements that clarify the interpretation of the GJ in different situations and contexts. These statements have mostly attempted to safeguard journalists' freedom of speech and clarify the boundary between journalism and advertorials, but guidance has also been given on correct journalistic use of people's social media postings. Another noteworthy statement from 2019 delineated the use of algorithms and artificial intelligence in journalism, which is probably the first recommendation on the topic by a European media council (CMM, 2019, p. 6).

In comparison, the complaint process has changed little. The CMM does not monitor media content itself for ethical soundness. Although the association's bylaws state that the council can start a complaint about an ethical breach independently (CMM, 2020b, Section 1), in practice it has done so extremely rarely (Nenne Hallman, CMM secretary, personal communication, September 7, 2021). Thus, the council's work rests on complaints by the general public. Making a complaint is free of charge and it can be done by regular mail, email, telephone, or on the CMM's website. For most cases, complaining does not require a personal stake, or prior contact to the media outlet. However, there are a number of other conditions to meet (CMM, 2020b, Sections 2, 9 & 11):

- ♦ Complaints are only accepted about member outlets.
- ♦ Complaints regarding social media and non-fiction books are not accepted.

- ♦ User comments qualify for complaints only if they are presented on outlets' websites.
- ♦ Complaints must be submitted within three months of the alleged breach of the GJ.
- ♦ Anonymous complaints are not accepted.
- ♦ When submitting a complaint, the complainant has to indicate which section of the GJ has been breached.
- ♦ Upon filing a complaint, complainants have to waive their right to go to court over the matter that is being processed by the CMM.

In the 2010s, the number of complaints has varied between approximately 250 and 450 annually, the average being 348 complaints per year (see Table 1). The most common reasons for complaints in the 2010s have been related to error correction, interviewees' rights and right of reply, violations of privacy and human dignity, and advertorials (CMM, 2021a).

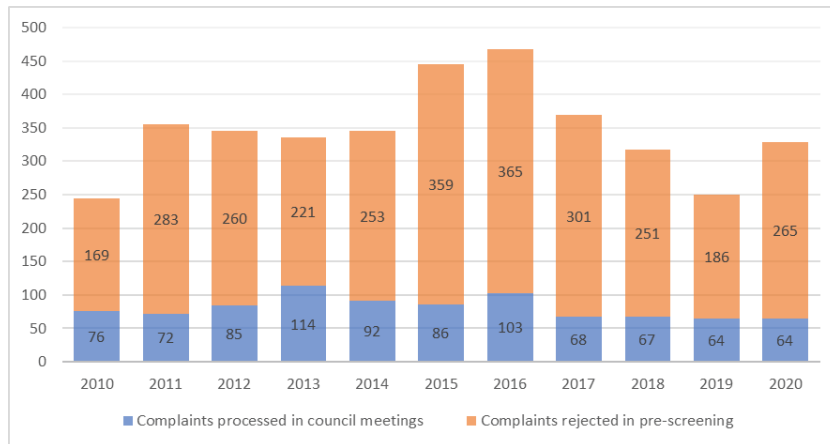
The complaints are processed in two phases. First, they are assessed in a pre-screening with three possible outcomes. One: the chairperson and support staff mediate between the complainant and outlet to reach a solution. This happens rarely. Two: the chairperson decides on the complaint independently in certain cases and informs the council. Such discretionary power has been increased to speed up the complaints process. Three: the chair and support staff decide together whether the complaint can be forwarded to the council meeting (Eero Hyvönen, CMM chairperson, personal communication, August 11, 2021; CMM, 2020b, Sections 2, 11 & 13).

The grounds for acceptance and rejection of complaints are not made public, which has been criticized (Lehtola, 2016). According to CMM secretary Nenne Hallman, most of the rejected complaints in recent years have lacked a clear indication of a breach of the GJ (Personal communication, September 7, 2021). Appeals against rejection of complaints are possible (CMM, 2020b, Section 19) but very rarely successful (CMM, 2021a). In the pre-screening, most complaints are rejected yearly (see Table 1).

In the second phase, the accepted complaints are processed in the council meetings that are held 9-10 times a year. Normally, the council convenes at the CMM offices in Helsinki, but during the COVID pandemic, the meetings have been held online. For each meeting, council members are paid €50 and transport costs if applicable. Meetings are

not public unless decided otherwise, but “people have the right to obtain information about documents held by the council” (CMM, 2020b, Section 15). However, some (parts of the) documents can be kept secret by the chairperson, or at the request of one of the parties involved in the case (CMM, 2020b, Section 15).

Table 1. *Complaints to the CMM, 2010-2020*



Sources: CMM 2021a; CMM 2021b.

For the meetings, the support staff prepare case summaries and make suggestions of decisions before council discussion. If needed, the council can invite either the complainant, a journalist or editor, or an expert to the decision-making meeting for their input. The council then makes the final decisions, which need not be unanimous, but mostly they are. Appeals against the council decisions are possible in certain circumstances (CMM, 2020b, Sections 17 & 18). In practice, the original council decisions are very rarely re-examined let alone reversed (Nenne Hallman, CMM secretary, personal communication, September 7, 2021).

If the council decides not to uphold the complaint, the outlet does not need to do anything, although publishing the decision is recommended (CMM, 2020b, Section 5). If the complaint is upheld, there is no other sanction apart from “naming and shaming”: the outlet in breach of the GJ has to publish the council’s decision immediately and without further comment. Since 2011, the decision must have been published both on the platform where the breach took place, and on the outlet’s

website if applicable (CMM, 2020b, Section 4). These rules have been widely accepted by the media, and transgressions are extremely rare.

Since 2014, there have been two categories for breaches: a condemning decision and a severe reprimand. The latter one was added to indicate a more serious violation of the GJ (CMM, 2013a, p. 3). The new category has been used sparingly. Almost 40% of all cases in the council meetings since 2014 have led to a condemning decision, which is almost a ten-point increase from 2010-2013 (CMM, 2020a, p. 6), but a severe reprimand has only been issued four times so far.

2.3. *Communications efforts*

Perhaps the most visible recent change at the CMM has been increasing communications activity, which has become a key part of the council's work (Ilkka Vääntinen, long-time CMM active, personal communication, September 7, 2021). Efforts to this end were started in 2010 to improve the CMM's credibility among the general public, assist its reform process, and raise people's awareness of its work. The then-chairperson Risto Uimonen led the activities by arranging advertising campaigns, visiting journalist associations in preparation for reforms, and by acting as a public figurehead for the CMM (CMM, 2010, pp. 5, 7). Another invention of his term was the aforementioned public call for audience member positions in the council. The first call in 2010 resulted in 750 applications for the three vacancies (CMM, 2010, p. 2), and following calls also attracted notable public attention (CMM, 2014, pp. 2-3).

Communication activities have taken many forms. First, the CMM has attempted to improve the visibility of self-regulation at schools. In 2013, it lobbied authorities in the Finnish National Agency for Education to introduce the GJ to the national school curriculum. The goal was not realised (CMM, 2013b), but cooperation with schools has been strengthened in media literacy projects for schoolchildren and teachers where the CMM has joined forces with industry actors (CMM, 2018, p. 17). The second point of focus has been fake news, which became a nationwide problem in 2015-16 and led to a concerted response from the CMM (Heikkilä & Väliverronen, 2019). Among the measures taken was a publicity campaign for responsible journalism and self-regulation, which was launched as part of the CMM's 50th anniversary celebrations (CMM, 2018, pp. 15-16).

Thirdly, the CMM has increased its public engagement. In addition to publicity campaigns, different seminars (e.g., CMM, 2018, pp. 18-22) have become a fixture in the council's work. On a day-to-day level, the biggest change in the 2010s has been the increasing social media presence to complement earlier telephone and email services. Since 2010, the chairperson has been writing a blog on the CMM homepage to elaborate on topical issues, and Facebook and Twitter have been used since 2016 and 2019 respectively for relaying information and having dialogue (CMM, 2021a). In 2020, CMM staff answered approximately 500 queries from the general public (CMM, 2020a, p. 15).

Finally, international activities have gained impetus following the need to find transnational solutions for global online media (Nenne Hallman, CMM secretary, personal communication, September 7, 2021). The CMM has maintained strong ties to other Nordic media councils and become an active member in the Alliance of Independent Press Councils of Europe (CMM, 2021a). One example of increasing international cooperation is the EU-funded research project "Media Councils in the Digital Age" where the CMM has so far been responsible for a report on the impact of news automation on self-regulation and media councils' work (Haapanen, 2020).

Conclusion and discussion of future challenges

In conclusion, it can be said that the reforms and changes in the 2010s have had a positive impact on the self-regulatory "empire" (Väliverronen & Heikkilä, 2018) of the CMM. The debate witnessed around 2010 about the future of the council and self-regulation has largely disappeared. The vast majority of Finnish media outlets are members in the CMM whose work represents a sign of quality for them and helps them stand out from the likes of fake media (AIPCE, 2020a). Individual journalists show practically unequivocal trust in the GJ (Pöyhtäri *et al.*, 2016) and often contact the council when they need an expert source in media ethics questions (AIPCE, 2020b).

Changes at the CMM and improved funding have helped the council become more professional. It has resulted in greater effectivity – complaint processing times have been reduced since the early 2010s (CMM, 2020a, p. 6) – and better visibility among the general public. In a nationwide poll conducted in late 2017, 55% of Finns said they were very familiar or somewhat familiar with the CMM while a further 32% said they had heard about the council. The CMM themselves estimated

the figures could be the highest ratings for a media council anywhere in the world (CMM, 2017, p. 3).

The view of self-regulation in Finland is flattering in an international comparison, too. In a recent study, international experts created a European Media Accountability Index among 33 countries that saw Finland in second place behind Norway (Eberwein *et al.*, 2018, p. 297). Moreover, trust in news media in Finland has long remained at a world-highest level, and the COVID pandemic has only served to increase trust in the news (DNR, 2021, pp. 19, 76-77). Although these studies are not directly concerned with the state of self-regulation, it can be estimated that the stable and respected status of self-regulation plays its own part behind these figures.

Thus, the future of self-regulation looks brighter than ten years ago, but there are also some dark clouds on the horizon. Many of the potential problems are related to the financial issues that journalism has been facing in the last ten years. Especially local and regional media have suffered from the ongoing digital switch in journalism (Grundström, 2020), and the COVID pandemic has only exacerbated these problems (DNR, 2021, p. 76). If ongoing, media outlets' financial difficulties may have a direct negative impact on the funding and work of the CMM (AIPCE, 2020b). There are also potential indirect impacts on the CMM and GJ, and their position among journalists. Recent studies indicate that increasing financial and other external pressures, and blurring boundaries between journalism and other forms of communication create discrepancy between journalists' ethical ideals and their practical enactments (Pöyhtäri *et al.*, 2016; Grönlund *et al.*, 2021) In these circumstances, following the GJ and explaining the ethical differences between journalism and other forms of communication to the public are seen to be increasingly difficult tasks, particularly in local and regional media (Grönlund *et al.*, 2021, pp. 13-17).

Ethical problems are most acute in the online sphere if audience contacts to the CMM are anything to go by (Nenne Hallman, CMM secretary, personal communication, September 7, 2021). In all likelihood, these pressures will not abate as new platforms, new forms of presentation, and new communicators are emerging rapidly online. Here, two potentially major problems for the future and efficacy of the CMM lie ahead. First, as journalism evolves and moves to new online platforms, how can the CMM ensure that the GJ covers those platforms effectively and adequately? Currently, only some areas of the online sphere are covered by the GJ. Secondly, as non-professionals will likely be

increasingly involved in the production of journalism, how to ensure that the new journalistic actors such as independent vloggers also become part of the self-regulatory system (AIPCE, 2020b)?

A partial answer to these questions may be found in a revision of the GJ, which is forthcoming in the next few years (Nenne Hallman, CMM secretary, personal communication, September 7, 2021). However, it seems evident that a revision of the ethical code will not be enough to solve all aspects of these problems. In some matters, international co-operation between media councils, and even nation-states, is likely to be required. At the national level, the state's continued financial support for self-regulation is needed, and media outlets need to assume greater responsibility to ensure that the ethical foundation of journalism remains solid (Heikkilä & Väliverronen, 2019). This task is by no means a small one and requires negotiation with several different actors. However, based on the experiences of the last ten years, the CMM appears well-placed to enter the negotiations.

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