

CORE VALUES IN JOURNALISM CODES OF ETHICS ACROSS THE LUSOPHONE WORLD

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ABSTRACT

This article examines the journalism codes of ethics of eight countries and one Portuguese-speaking autonomous region to understand how the values that guide journalists' ethical practices resemble, differ and diverge. The study considers how journalists' standards in countries with shared histories, languages, and cultures shaped by Portugal's colonial legacy have evolved or remained static, particularly since their inclusion in the Community of Portuguese-Speaking Countries in 1996. The documents analysed are the reference documents in each territory, are written in Portuguese and apply to all journalists. The analysis used MAXQDA software and sought to characterise the content of the codes, their authors, the entities responsible for ensuring their application, and the core values. Despite the multiplicity of local realities, the codes display clear similarities and, in some cases, considerable formal and substantive resemblance to the code of ethics for Portuguese journalists. In many cases, notably in Portuguese journalism, the profession's self-regulatory standards appear in legal documents, are subject to external regulation or are even endorsed by the State. Examples of significant normative autonomy also point to distinct paths in the development of journalists' professional self-regulation, as in Brazil, a former Portuguese colony that has been independent for over 200 years.

KEYWORDS

journalism, ethics, codes of ethics, Lusophone world, self-regulation

VALORES MATRICIAIS DOS CÓDIGOS DEONTOLÓGICOS DO JORNALISMO NO MUNDO LUSÓFONO

RESUMO

Neste artigo, examinamos os códigos deontológicos do jornalismo de oito países e uma região autónoma de língua portuguesa para perceber como os valores que guiam os jornalistas

em direção a práticas éticas se assemelham, diferenciam e divergem entre si. Trata-se de perceber como evoluíram, ou não, as normas dos jornalistas de países que, nos últimos séculos, partilharam histórias, línguas e culturas, em resultado do passado colonial português, e que, desde 1996, fazem parte da Comunidade de Países de Língua Oficial Portuguesa. Os documentos analisados são os de referência em cada território, estão em língua portuguesa e aplicam-se a todos os jornalistas. A análise foi feita com apoio do software MAXQDA e procurou caracterizar os conteúdos dos códigos, os autores e as entidades que garantem a sua aplicação, bem como os valores matriciais. Observa-se que, apesar da multiplicidade das realidades locais, os códigos apresentam nítidas similaridades e, em alguns casos, alguma semelhança formal e de conteúdo com o código deontológico dos jornalistas portugueses. Em muitos casos, a começar pelo português, é notório o facto de as normas de autorregulação da profissão de jornalista estarem repercutidas em documentos legais, da heterorregulação, ou mesmo existirem com o respaldo do Estado. Há também exemplos de expressiva autonomia normativa, sinalizando caminhos distintos na evolução da autorregulação profissional dos jornalistas, como é o caso do Brasil, uma ex-colónia portuguesa com mais de 200 anos de independência.

PALAVRAS-CHAVE

jornalismo, deontologia, códigos de ética, lusofonia, autorregulação

1. INTRODUCTION

This article presents a first study of journalists' codes of ethics in Portuguese-speaking countries (Angola, Brazil, Cabo Verde, Guinea-Bissau, Mozambique, Portugal, São Tomé and Príncipe, and Timor-Leste) and in the autonomous region of Macau (China). The study is distinctive in that it examines countries whose territories were subject to Portuguese colonization or occupation and that still share Portuguese as a common official language today. Despite this commonality, these are territories with different colonial pasts, cultures, histories, and political and economic contexts.

Within this framework of proximity and diversity, the study aims to understand how the journalism codes of ethics of Lusophone countries are characterised. The research addresses the following questions: who promoted these codes? Which bodies adopted the standards? In what context were they formulated and began to circulate? The study also seeks to identify the values present in the codes, as well as those that unite and distinguish them.

Using quantitative and qualitative content analysis and interviews with researchers and journalists, the article presents a comparative study of the codes of ethics of eight countries and one autonomous region where Portuguese is an official language. The nine documents analysed were all drawn up by journalists, aspire to national representation, and apply across all media.

While the study shows that some countries have developed their own normative path in journalism, a notable group of cases remains distinguished by their structural and content-based proximity to the three codes of ethics adopted by Portuguese journalists since 1976.

2. OTHER COMPARATIVE STUDIES

As normative and self-regulatory documents, journalism codes of ethics are among the objects of study used to understand the profession's values and the culture of its professionals and media in different countries around the world. Here, codes of ethics are understood as a means of incorporating, within the socioprofessional framework, broader values of a normative system that encompasses ethics, morality, and law. Frequently, the values within this system overlap and complement one another, but at times they also conflict (Camponez, 2011). They result from efforts to institutionalise regulation of professional practices. In this sense, journalism codes of ethics must also be understood within the framework of a process of standardising a socioprofessional culture at the national level, which is also part of globalisation. This process was clearly evident in the first attempts to internationalise journalism values within the United Nations in 1950 and 1952 (Cornu, 1994). Despite their initial failure, these efforts ultimately gained recognition in the United Nations Educational, Scientific and Cultural Organization's declaration on *International Principles of Professional Ethics in Journalism*. The document was adopted at the fourth consultative meeting of international and regional organisations of journalists, representing 400,000 journalists, held in Paris on 20 November 1983, under the auspices of the United Nations Educational, Scientific and Cultural Organization, thus taking the form of a global ethics of journalism, more normative than prescriptive (Cornu, 1994).

In the same vein, the most recent version of the code of ethics of journalists of the International Federation of Journalists, adopted in 2019 in Tunis, bears the symptomatic title *Global Charter of Ethics for Journalists*.

In a 1980 study, Jones (1980) traced approximately 50 codes of ethics around the world; 20 years later, in a survey of media self-regulatory mechanisms and ethics, Pigeat and Huteau (2000) stated that it was rare not to find at least one journalism code of ethics in every country in the world. As it is not possible to address all of them exhaustively, we cite, for reference, the studies by Brajnovic (1978), Barroso Asenjo (1984), Harris (1992), Laitila (1995), Villanueva (1999), Hafez (2002), Aznar (2005), Himelboim and Limor (2008), Roberts (2012), and Christofolletti and Ferreira (2013). In general, values such as truthfulness, correction of errors, freedom of expression and comment, rejection of discrimination, hearing the parties involved, respect for commitments made to sources, independence and integrity of journalists — to cite only the most relevant — emerge as recurring values.

3. CODES IN AFRICA AND LUSOPHONE COMPARISONS

Given the scope of this study, mention should be made of Kai Hafez's (2002) research on 32 codes of ethics in Islamic countries in North Africa, the Middle East and the Far East. The author acknowledges that, in these regions, journalism seems to struggle to cover issues such as religion, sex and politics, unlike journalists of Western tradition, who favour the individual right to freedom of expression above almost everything else.

For Hafez (2002), this conclusion could lead us to classify codes of ethics within two ethical traditions: liberal (individualistic) and communitarian. However, the author argues that the study reveals the complexity of identifying guiding norms that define attitudes toward “good” journalism. Thus, aspects of media freedom often stem from the power structures underlying the codification of professional ethics, a reality that seems to supersede a collectivist/communitarian conception of codes. According to the author, governments cynically misuse traditions and religion to hijack discussions about values, suppress human rights and control the media.

The literature on professional ethics in African countries refers to the “Windhoek Conference” (Namibia, 1991) as a milestone in the emergence of a critical conception of information on the continent, coinciding with processes of democratisation following the fall of the Berlin Wall. In this context, Aw (2013) notes that African States adopted regulations either in consultation with, or independently of, journalists’ representative structures. Thus, these standards are implemented through regulatory and self-regulatory structures, but the nature of political regimes usually determines how these bodies operate.

Frère (2020) highlights the importance of the “Windhoek Conference”, as well as the processes of democratisation and liberalisation of information that began in Africa in the 1990s, in the emergence of new codes of ethics. Referring specifically to Francophone African countries, the author highlights responsibility, independence, honesty, human dignity and, in some cases, professional solidarity as values shared across these documents.

Nevertheless, the idea of universalising these principles remains the subject of critical discussion in some countries. The concern is to adapt the ethical standards of journalism to the specific contexts of each African country, in response to the increasing Westernisation of these principles. Examples include proposals to revive Ubuntu ethics for journalism, more consistent with local values and debates across the continent (Fourie, 2010). These perspectives are presented as an alternative to, or critique of, the Western universalist claim concerning the values of journalism ethics. These approaches are also criticised for risking the relativisation of values and their subordination to the interests of authoritarian regimes. According to Frère (2020), some of these positions are not exempt from criticism concerning a romanticised view and reconstruction of a pre-colonial Africa, “harmonious, supportive and communitarian, but also static and unchanging” (Tomaselli, 2009, as cited in Frère, 2020, p. 220).

These processes of globalisation and communitarianisation of journalism values cannot be seen merely as expressions of socioprofessional processes. As Hallin and Mancini (2004/2010) demonstrate, journalism itself results from broader political, social, economic, and cultural processes, as well as local, regional, and diplomatic contexts.

This latter dimension seems relevant to us given the shared past of the countries under study, initially shaped by colonial relations and, more recently, by the political construction of a consortium of countries that share a common language, the Community of Portuguese-Speaking Countries (CPLP), established in 1996. As Sebastião (2016) notes, the perception of a community of language and culture takes as a reference point the very concept of “Lusophony”, whose origins lie in “Lusotropicalism”, developed by the

Brazilian Gilberto Freyre. Despite the initial distancing adopted by the Estado Novo regime under Oliveira Salazar, the concept continued to develop under the minister for the Overseas Territories, Adriano Moreira, who co-founded the Movement for the Union of Portuguese-Speaking Communities and chaired the first two congresses of the communities, held in Lisbon in 1964 and in Lourenço Marques (now Maputo) in 1966 (Sebastião, 2016). Although distrust and scepticism towards the concept persisted after Portuguese decolonisation, the idea of a community of countries linked by “Lusophony” culminated in the CPLP, 22 years after the Revolution of 25 April 1974.

No systematic research has examined journalism codes of ethics across all CPLP countries. However, in recent years, studies have analysed aspects of the media and the regulation of communication and information within the CPLP (Camponez et al., 2022; Oliveira et al., 2022; Sebastião, 2016, 2018).

In line with the conclusions reached by Hafez (2002) and Aw (2013), Martins (2016) emphasises that the differences between the systems do not truly lie in legal and constitutional matters. According to the author, media capacity to intervene also differs considerably from country to country because autonomy and independence are not always effectively safeguarded.

Using the concept of “Lusophony” to analyse social communication means attempting to encompass the realities of nine nationalities across three continents, with different historical and political realities, regulatory and legislative traditions, and distinct professional and media cultures.

Taken as a whole, these countries have experienced long periods of colonisation, dictatorships, civil wars, and occupation. The freedom achieved unfolds within struggles for independence, *coups d'état*, and more or less turbulent political transitions.

4. ANALYTICAL METHODOLOGY

Using Hafez (2002) and Serwornoo (2019) as reference points, this study also draws on Nordenstreng's (1995) “pragmatic” approach. We therefore used qualitative and quantitative content analysis. We began by conducting a thematic analysis of the nine journalism codes of ethics in Portuguese-speaking contexts. This approach enabled us to identify the fundamental values of the different codes and to cross-reference these findings. This identification of values, as well as the results, involved repeated readings of the codes by the three researchers and the use of the qualitative analysis software MAXQDA.

To ensure the coherence and representativeness of the sample, two cumulative inclusion criteria were defined: (a) codes of ethics with a national scope; and (b) codes regulating the entirety of journalistic activity, regardless of the medium or mode of professional practice — namely, the press, radio, television, digital media or freelance practice. The proposed analysis is structured around three fundamental research questions (RQs), progressively articulated and interrelated.

The first question (RQ1), descriptive and contextual, explores the organisational configuration of journalism codes of ethics in Portuguese-speaking countries. More specifically, this question is divided into three sub-questions (SQs):

- SQ1: identification of the authorship of the codes;
- SQ2: identification of the bodies that formally adopted them; and
- SQ3: characterisation of the historical, political and professional circumstances in which they were conceived and came into circulation.

The second question (RQ2), substantive in nature, focuses on the axiological content of the codes, with the aim of identifying and systematising the ethical values and principles enshrined in them.

The third question (RQ3), comparative in nature, seeks to assess convergences and divergences among the different codes of ethics analysed to map continuities and discontinuities in the normative framework of journalism across the Portuguese-speaking world.

To address the limited literature on this subject, the research incorporates semi-structured interviews with researchers and journalists from each country, prioritising leaders of journalists' organisations when available. These interviews, conducted online, via email, aimed to gather historical information and to elucidate the contexts underlying the creation of the codes of ethics¹.

5. A BRIEF HISTORY OF LUSOPHONE CODES

Two aspects stand out from our analysis of codes of ethics in the Portuguese-speaking world. First, most Portuguese-speaking journalists have sought to ground professional ethics in law, even though law itself has not determined them. Second, five of the eight countries in the Portuguese-speaking world have drawn inspiration, at least initially, from codes created by Portuguese journalists.

In Brazil, the first code dates back to 1949 and was adopted by the National Federation of Journalists. The current *Código de Ética dos Jornalistas Brasileiros*² (Code of Ethics for Brazilian Journalists) is the fourth version of the code and the document most widely followed in the country. Local journalists' unions developed the document, and a general assembly approved it at the "National Congress of Journalists" in 2007. The document does not depend on State sanction, nor did the State prompt it. This condition has both positive and negative aspects: the advantage is that it constitutes a distinctive case of professional self-regulation, autonomy and organisational capacity among journalists; the disadvantage is that the most severe sanction provided for by the code cannot include revocation of professional license, since, in the Brazilian case, this is the prerogative of those responsible for issuing it, namely Government bodies.

Overall, the *Código de Ética do Jornalista Brasileiro* has the most distinctive wording and structure among the Portuguese-speaking countries. It is also the longest and most

¹ This study provides a first systematic overview of journalism codes of ethics in Portuguese-speaking countries, combining a reconstruction of the contexts in which they emerged with an analysis of the values that shape them. Given the exploratory nature of the research and the constraints on the length, this study addresses the historical-descriptive and normative dimensions in an integrated manner, while each may, in its own right, be explored in greater depth in future research.

² https://fenaj.org.br/wp-content/uploads/2014/06/04-codigo_de_etica_dos_jornalistas_brasileiros.pdf.

detailed, consisting of four chapters and 19 articles. This is reflected, as we shall see, in the inclusion of a set of universalist values, representing an approach distinct from that of the other codes analysed here.

In Portugal³, journalists produced a first version of a code in 1973, which was never adopted. This occurred only three years later, after the Press Law set a 90-day deadline for the Journalists' Union to draft and approve its code of ethics. This eventually took place in 1976. The initiative marked the beginning of a long process of what came to be termed "induced self-regulation", which characterises the Portuguese case (Carvalho, 2022). This was the political response adopted following the April Revolution to address the weak tradition of journalistic autonomy resulting from 48 years of prior censorship (1926–1974). Between 1999 and 2007, this policy of inducing and supervising journalists' self-regulation led Portuguese legislation to incorporate, in general terms, or adapt, in some cases, or, in others, add provisions to those established within journalism ethics, through Article 14 of the Journalists' Statute, approved in 1999 and substantially revised in 2007 (Lei n.º 1/99, 1999; Lei n.º 64/2007, 2007).

In the case of Mozambique⁴, Nhanale and Namburete (2022) note that the lack of a sense of professional solidarity and the absence of a regulatory body, as well as of strong self-regulatory institutions, "has implications for the social responsibility of the media" (p. 135). This situation reflects a broader pattern characterised by the limited relevance of "mechanisms for monitoring the quality of media content, as well as for penalising deviations from the values and principles of professional ethics" (Nhanale & Namburete, 2022, p. 135). The *Código de Ética e Deontologia do Jornalista Moçambicano* (Code of Ethics and Professional Conduct of Mozambican Journalists) dates from 2010 and is organised into 18 items. A careful reading of the document reveals many parallels with the first code of ethics of Portuguese journalists, from 1976. This matters because, unlike the other cases that used the 1993 Portuguese code as their reference, Mozambique appears to have drawn more heavily on the Portuguese code of ethics drafted during the Carnation Revolution.

Cabo Verde's *Código Deontológico do Jornalista* (Code of Ethics for Journalists)⁵ dates to 2011. It was an initiative of the Trade Union Association of Cabo Verdean Journalists. It was adopted at an Assembly of Journalists, in compliance with a government requirement that it be put to a vote at a general meeting of journalists. According to the explanatory text contained in the document, which regulates the professional morality of Cabo Verdean journalists, the amendments were intended to update the 1998 code "in accordance with the current reality, marked by the impact of information and communication technologies" (p. 1).

The Trade Union Association of Cabo Verdean Journalists states in its introductory note that the code recovers the ethical and professional values embodied in the

³ <https://jornalistas.eu/codigo-deontologico/>.

⁴ <https://objethos.wordpress.com/wp-content/uploads/2018/12/objethos-cc3b3digo-deontolc3b3gico-de-moc3a7ambique.pdf>.

⁵ <https://www.arc.cv/arc/atividade-jornalistica/18>.

Constitution of the Republic, the Basic Law governing the media and the Journalists' Statute. The experiences and representation of Cabo Verdean journalists in international organisations, such as the International Federation of Journalists, the West African Journalists' Union and the Federation of Journalists of Portuguese-Speaking Countries, are also cited as sources of inspiration.

In 2013, the Association of Journalists of Timor-Lorosa'e, the Timor-Leste Press Club (now the Timor-Leste Press Union) and the Timor-Leste Journalists' Union approved the first *Código de Ética dos Jornalistas de Timor-Leste* (Code of Ethics for Timor-Leste Journalists). However, based on an interpretation of the Articles 21 and 44 of Media Law (Lei n.º 5/2014, 2014), which grants it the authority to approve and supervise compliance with the journalists' code of ethics, the Press Council considered itself entitled to create a new code of journalistic ethics⁶ and give it the force of law (Regulamento n.º 1/2017, 2017). This initiative was based "on the principle that it should not approve a document that it had not [previously] drafted" (Brinca, 2021, p. 52). Indeed, both documents are structured around 10 principles and, although the normative principles did not change substantially, their ordering and wording changed. The content and wording show some parallels with the Portuguese code of ethics, although some formulations also follow international codes of ethics.

The *Código Deontológico dos Jornalistas da Guiné-Bissau* (Code of Ethics for Journalists of Guinea-Bissau)⁷ was created in 2017 by the Union of Journalists and the Order of Journalists of Guinea-Bissau. The initiative took place within the framework of the United Nations Integrated Peacebuilding Office in Guinea-Bissau, under a Security Council mandate that ended in 2022. However, implementation was suspended pending approval by the National People's Assembly and the Guinean Council of Ministers (Nhaga, 2022), which only occurred in 2022. Representatives of both the Journalists Order and the Union of Journalists acknowledged that journalists' awareness of the code was still very limited.

The Macanese code⁸ is a self-regulatory instrument that originated with the Macau Portuguese and English Press Association (AIPIM), founded in 2005. The code was approved in May 2017 at a General Assembly of the association, following a study conducted by a committee appointed for that purpose and a consultative and deliberative process among journalists that involved two general meetings.

According to the president of AIPIM, the decision to adopt a code followed the Congress of Journalists, held in Macau in 2011. The meeting brought together Lusophone associations and unions within the Federation of Portuguese-Speaking Journalists. The creation of the code was also connected to AIPIM's application for membership of the International Federation of Journalists, which was completed in 2017. The association

⁶ <https://conselhoimpressao.tl/politika/legislasaun/deliberasaun?task=download.send&id=50&catid=17&m=0>.

⁷ <https://mediagb.org/wp-content/uploads/2024/05/Codigo-Deontologico.pdf>.

⁸ <https://www.aipim.org.mo/codigo-deontolgico>.

has no structure to ensure the implementation of the code, meaning that its normative scope is strictly moral. In Macau, another code of ethics is in force: that of the Macau Journalists Association, which mainly brings together Chinese-speaking journalists.

In Angola, according to the website of the Professional Licence and Ethics Committee, the journalist's "code of ethics" was adopted at an Ordinary Assembly held on 26 October 2019, under the supervision of the Angolan Media Regulatory Authority, which also gave rise to the Professional Licence and Ethics Committee, established to regulate journalists' activities.

The *Código de Ética e de Deontologia dos Jornalistas Angolanos* (Code of Ethics and Professional Conduct of Angolan Journalists)⁹ applies to all national journalists and to foreign journalists working in Angola for more than 45 days. An earlier code was approved in 2004 and ratified by five of the six representative journalists' associations. However, implementation of the code was conditional on approval by the Angolan Parliament and the establishment of a Professional Licence and Ethics Committee, currently considered the main self-regulatory body for Angolan journalists. The establishment of this body and the start of its activities led to the approval and entry into force of the new code. Its similarities to the 1993 version of the Portuguese code of ethics are notable.

The first code of ethics for São Toméan journalists dates from 2019, and Government Decree No. 25/2019, promulgated by the President of the Republic, regulates its implementation. The document was adopted following a consultation involving all professionals and staff of public, private and community media organisations. The document's approval represented the achievement of an objective pursued about a decade earlier by the Union of Journalists and Media Technicians and, in recent years, also received support from the Association of São Toméan Journalists. The document is structured around 10 principles and, essentially, follows the content of the 1993 code of ethics of Portuguese journalists.

6. PRESENTATION OF RESULTS

Except for Brazil, which has had a code of ethics since 1949, journalism codes of ethics in Portuguese-speaking contexts emerged relatively late. After Brazil, Portugal approved its first code in 1976, while Angola and São Tomé and Príncipe were the last countries to do so, in 2019, after Timor-Leste, which was the last Portuguese-speaking territory to achieve independence, in 2002 (see Table 1). Although drafting a code had been an objective since the foundation of what was then known as the National Union of Journalists, Portuguese journalists refused to adopt a code of ethics as long as prior censorship remained in force in what was the last country in Western Europe to abolish it. Timor-Leste, as we have seen, only achieved independence in this century. In the other countries, this process appears to have followed a similar trajectory. However, not necessarily concurrently, political opening (Cabo Verde) and internal pacification following civil wars (Angola and Mozambique) also played a role, alongside professional dynamics (Guinea-Bissau, São Tomé and Príncipe and Macau).

⁹ <https://cce.ao/ao/codigo-deontologico/>.

COUNTRY/ REGION	CURRENT VERSION	PREVIOUS VERSIONS	AUTHORSHIP OF THE CODES
Angola	2019	2004	Union of Angolan Journalists, Angolan Journalists' Union and other professional associations
Brazil	2007	1949/1968/1985	National Federation of Journalists
Cabo Verde	2011	1998	Trade Union Association of Cabo Verdean Journalists and journalists from various media organisations
Guinea-Bissau	2018	-	Guinea-Bissau Union of Journalists and Media Technicians and Order of Journalists
Macau (China)	2017	-	Macau Portuguese and English Press Association
Mozambique	2010	-	National Union of Journalists
Portugal	2017	1976/1993	Journalists' Union
São Tomé and Príncipe	2019	-	Journalists and Media Technicians
Timor-Leste	2017	2013	Press Council

Table 1. Journalism codes of ethics by date and founding organisations

Our study demonstrates that, in general, there was a concern to ensure that the codes were approved by the majority of professionals working in the respective countries and by their representative associations. The only exception was Timor-Leste, where the Press Council, a regulatory body, decided, in exercising its supervisory functions, to adopt its own code in 2017, superseding the one approved by journalists four years earlier, without departing from its underlying principles.

In the remaining cases, oversight of the implementation of the codes depends either exclusively on the self-regulatory bodies that adopted them (Brazil and Mozambique) or on the regulatory or co-regulatory bodies that assumed responsibility for the document approved by journalists (Angola, Cabo Verde, Guinea-Bissau, São Tomé and Príncipe; see Table 2). In Portugal, the document, approved by the Journalists' Union, was put to a referendum of all journalists and was subsequently adopted simultaneously by the Media Regulatory Authority, the Professional Licence Committee and the Ethics Council of the Journalists' Union¹⁰. The Journalists' Statute, which regulates the profession in the country, incorporated virtually the entire content of the code, effectively giving it the force of law. Finally, in Macau, the code of ethics is strictly moral in nature, with no mechanism for monitoring, control or sanction.

¹⁰ For the powers of these three bodies and the overlap between regulatory, co-regulatory and self-regulatory powers, see Miranda and Camponez (2017).

COUNTRIES/ REGIONS	BODIES THAT ADOPTED THE CODES	BODY RESPONSIBLE FOR IMPLEMENTING THE STANDARDS
Angola	Union of Angolan Journalists, Sindicato dos Angolan Journalists' Union, Association of Economic Journalists of Angola, Angolan Female Journalist Association, Angolan Sports Press Association, Forum for Women's Journalists for Gender Equality, Press Freedom Organisation	Professional Licence and Ethics Committee
Brazil	National Federation of Journalists	Ethics committees of the unions and, at second instance, the National Ethics Committee
Cabo Verde	Trade Union Association of Cabo Verdean Journalists	Journalists' Professional License Committee
Guinea-Bissau	Guinea-Bissau Union of Journalists and Media Technicians, Order of Journalists	National Media Council
Macau (China)	Macau Portuguese and English Press Association	Macau Portuguese and English Press Association
Mozambique	National Union of Journalists	National Union of Journalists
Portugal	Journalists' Union — referendum	Journalists' Professional License Committee, Regulatory Authority for the Media, Ethics Council of the Journalists' Union
São Tomé and Príncipe	Union of Journalists and Media Technicians, Association of São Toméan Journalists	Professional Licence Committee and High Council of the Press
Timor-Leste	Press Council	Press Council

Table 2. Bodies responsible for ensuring the implementation of the codes

Another dimension links journalism codes of ethics in Portuguese-speaking contexts: structuring their values into 10 items. Angola, Macau, São Tomé and Príncipe and Timor-Leste adopted the structure inspired by the penultimate version of the Portuguese code, from 1993. In the 2017 revision, Portuguese journalists added one item, following minor content adjustments. However, although these documents are structured around 10 items, they incorporate more than 10 principles of journalism ethics (Table 3).

COUNTRY/REGION	CODE STRUCTURE
Angola	Framework concerning the proponents and standards (10 items)
Brazil	Four chapters, 19 articles, 51 clauses and three paragraphs
Cabo Verde	Introductory note and standards (17 items)
Guinea-Bissau	Preamble and standards (16 items)
Macau (China)	A 10-item structure
Mozambique	Introductory framework, Chapter I (18 paragraphs) and Chapter II (two items)
Portugal	A 10-item structure + 1 point
São Tomé and Príncipe	Preamble and 10-item structure
Timor-Leste	Regulatory framework and 10-item structure

Table 3. Characterisation of the formal structure of the codes

Brazil's code of ethics is the longest, comprising four chapters and 19 articles, for a total of 1,692 words. Mozambique's code is the second-longest, structured into two chapters, 18 paragraphs, and two items, though it contains only slightly more than 500 words (591). It should be noted, however, that the word count carried out in this study (Figure 1) includes preambles, introductions, general principles and historical frameworks, meaning that the word count is not limited to strictly normative aspects.

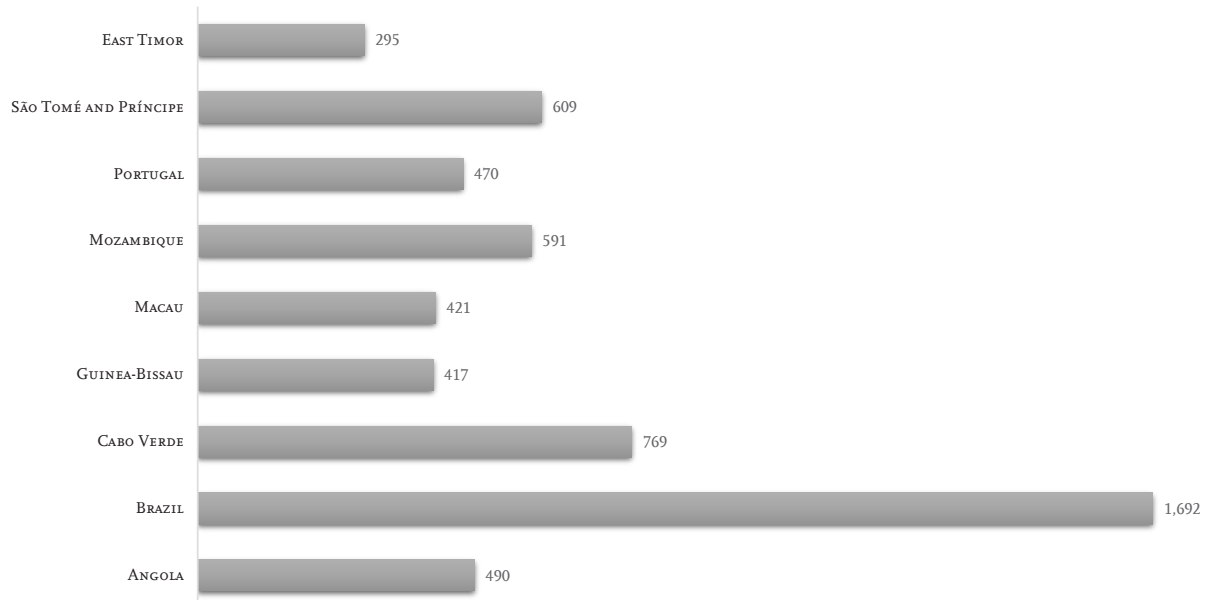


Figure 1. Number of words in each code of ethics

The tables below result from repeated readings of the codes of ethics, creating broad categories that encompass all content present in the nine codes of ethics.

In this first approach, we attempted to highlight common aspects of the principles governing journalism in Portuguese-speaking contexts. Accordingly, journalistic norms were grouped into four broad categories: (a) values that guide journalism (e.g., truth, accuracy/rigour...; see Table 4); (b) elements arising from procedures and practices required of journalists (e.g., treatment of sources...); (c) aspects of the relationship between journalism and society, where the codes appear to interpret the social mission of journalists (e.g., public interest, respect for human rights, promotion of citizenship...); and, finally, (d) values related to the self-affirmation of journalism as a profession (e.g., responsibility, independence, freedom...).

EXPRESSED VALUE	ANGOLA	BRAZIL	CABO VERDE	GUINEA- BISSAU	MACAU (CHINA)	MOZAMBIQUE	PORTUGAL	SÃO TOMÉ AND PRÍNCIPE	TIMOR- LESTE
Combat censorship and self-censorship	x	x	x		x	x	x	x	x
Defend copyright		x	x			x			
Reject discrimination	x	x	x	x	x		x	x	x
Reject humiliation/show compassion	x	x			x		x	x	
Be precise/ rigorous	x	x			x	x	x	x	
Presume innocence	x	x	x	x	x		x	x	x
Respect privacy	x	x			x	x	x	x	x
Do not accept bribes		x		x					x
Seek the truth	x	x	x	x	x	x	x	x	x

Table 4. Journalistic values identified in the codes

The values related to truth are shared across all the codes of ethics of Portuguese-speaking countries, in line with what we find in studies of codes of ethics in other geographical contexts, as mentioned above. Except for Guinea-Bissau, all countries reference combating censorship (censorship and self-censorship, restrictions on the freedom to inform and be informed, or on freedom of expression and of the press). Rejection of discrimination is also a value found across the codes, except in the Mozambican case. In the cases referred to, the concept appears in different formulations, whether in the general formulation of “all forms of discrimination” or, in almost all cases, in terms of its specific forms: race, ethnicity, creed, nationality, territory of origin, gender, sex, sexual orientation, political convictions, ancestry, social status, education, economic status, nationality, language, religion and disability.

The presumption of innocence is also referenced in eight of the nine codes of Portuguese-speaking journalists (the exception being Mozambique). The concept applies specifically in a judicial context to defendants under investigation and even after charges have been brought, until a final and binding judgment has been issued.

Less frequently referenced is the defence of copyright, identified in the codes of Brazil, Cabo Verde and Mozambique. Only Brazil, Guinea-Bissau and Timor-Leste refer to bribery as a problem.

Regarding the category we identified as “journalistic procedures” (see Table 5), many common aspects also appear, most notably the treatment of information sources, which all the codes reference.

IDENTIFIED REQUIREMENT	ANGOLA	BRAZIL	CABO VERDE	GUINEA- BISSAU	MACAU (CHINA)	MOZAMBIQUE	PORTUGAL	SÃO TOMÉ AND PRÍNCIPE	TIMOR- LESTE
Do not make accusations without evidence	x	x			x	x	x	x	
Do not identify victims of sexual offences	x	x	x		x		x	x	x
Respect sources	x	x	x	x	x	x	x	x	x
Identify oneself as a journalist	x	x	x		x	x	x	x	
Respect the editorial line		x		x					x
Use appropriate means to obtain information	x	x	x		x		x	x	x
Do not identify minors	x	x	x		x		x	x	x
Express opinions responsibly	x	x	x	x	x	x	x	x	
Do not plagiarise	x	x	x		x	x	x	x	
Respect embargoes		x							x
Correct errors	x	x	x	x	x	x	x	x	x
Reject sensationalism	x	x	x		x		x	x	
Respect source confidentiality	x	x	x	x	x		x	x	

Table 5. Journalistic practices expressed in the codes

Information sources are referred to both in terms of the prevailing principle of identifying them in all information disseminated and in terms of the duty to combat and report any obstruction to access to them. The text also refers to respecting commitments made to sources and protecting their anonymity. In the cases of Portugal, São Tomé and Príncipe and Macau, confidentiality must be maintained “even in court”, that is, even if the court orders its disclosure. Although the wording of the Angolan code closely follows that of the Portuguese code, the expression “even in court” does not appear in the text.

The promotion and correction of errors are also values shared by all and derive from journalists’ own duty to accuracy, truth, and objectivity, as identified above.

Under the heading of procedures, eight of the nine codes also address the treatment of opinions. They emphasise that journalists may not obstruct the expression of opinions different from their own; that opinion in the media must be expressed responsibly (Brazil); that the separation between opinions and facts/news must be clear to the public; and that opinions expressed in news reports must always be attributed to their source. The Timor-Leste journalists’ code of ethics does not address this last aspect.

The overall analysis of the category concerning procedures reveals that nine of the 13 subcategories identified are referred to in at least seven codes of Portuguese-speaking journalists, reflecting a high degree of convergence in this respect. However, respect for embargoed news receives only one reference — in the Brazilian code.

The normative categories concerning the relationship between journalism and society (Table 6) and the self-affirmation of journalism (Table 7) warrant some preliminary remarks. Compared with the categories analysed thus far, these show the least convergence of principles. The analysis shows that none of the subcategories is present in all the codes of ethics of Portuguese-speaking journalists. Taken together, these two categories contain only one subcategory (“conflicting interests”) that appears in eight of the nine codes of Portuguese-speaking journalists. The second most frequently referenced subcategory (“conscience clause”) is identified six times.

NORMATIVE PRINCIPLE	ANGOLA	BRAZIL	CABO VERDE	GUINEA-BISSAU	MACAU (CHINA)	MOZAMBIQUE	PORTUGAL	SÃO TOMÉ AND PRÍNCIPE	TIMOR-LESTE
Defend citizens' freedom and right to be informed		x				x			x
Recognise human dignity		x	x	x					
Respect the right to honour, reputation, image and good name		x	x						
Respect the right of reply		x				x			x
Respect human rights		x				x			
Respect the public interest		x		x					
Respect conflicting interests	x	x	x	x	x		x	x	x
Participate in media life			x						
Promote peace and understanding among peoples						x			
Promote citizenship		x				x			

Table 6. Forms of relationship between journalists and society according to the codes

TYPE	ANGOLA	BRAZIL	CABO VERDE	GUINEA-BISSAU	MACAU (CHINA)	MOZAMBIQUE	PORTUGAL	SÃO TOMÉ AND PRÍNCIPE	TIMOR-LESTE
Conscience Clause	x	x	x		x		x	x	
Professional honour		x	x			x			x
Professional independence		x				x			
Impartiality			x	x					x
Professional loyalty		x				x			
Freedom of expression		x		x		x			x
Responsibility		x					x		

Table 7. Elements of journalism self-affirmation identified in the codes

This imbalance between convergent values is more noticeable in Table 6, where the item concerning conflicting interests appears, but the following principles converge in no more than four codes of ethics.

Brazil's strong contribution to these two broad normative categories should also be highlighted. Of the 18 principles included, the Brazilian code addresses all but three: participation in media life (mentioned only by Cabo Verde); promotion of peace and understanding among peoples; and impartiality. Mozambique is the second country whose code contributes most to these two groups of categories. Given the Mozambican code of ethics' proximity to the 1976 version of the Portuguese code, this may indicate what was removed from the 1993 version, particularly content that journalists considered reflected Portugal's revolutionary context following the fall of the dictatorship.

Turning to a more detailed analysis, Table 6 shows a high degree of convergence in the identification of interests that conflict with the nature of the journalism profession: reporting on matters in which the journalist has an interest; obtaining personal benefits in return; using one's status as a journalist to gain access to privileges that would not otherwise be available outside the exercise of the profession; accepting positions or offers liable to compromise independence or integrity; allowing oneself to be used as an instrument of political propaganda, economic interests or any other interests deemed illegitimate; and, finally, engaging in activities considered legally incompatible under the laws in force. This last formulation is found in the Angolan code. In reality, however, other countries also make journalism legally incompatible with other professions. For example, Cabo Verde explicitly identifies advertising and press relations as incompatible professions in its code of ethics. The same applies to Portugal, where, although the code of ethics is not explicit on this matter, the situation is subject to legal regulation. Under the Journalists' Statute, advertising, press relations, public relations, and the exercise of certain political functions or military service require journalists to surrender their Professional Journalist License and cease practising the profession. The subcategories with the most references converge across only three codes.

The same dispersion identified above appears in Table 7 for the category of "journalism self-affirmation". This category highlights aspects that in some way emphasise the specific dimension of journalism and its moral dimension, associated with a socio-professional collective.

Issues relating to professional conscience acquire greater prominence, appearing either through the explicit invocation of the conscience clause (Angola and Cabo Verde, the latter in the preamble) or through the more general formulation that journalists should refuse journalistic practices that violate their conscience.

7. CONCLUSIONS

The analysis of the nine journalism codes of ethics in the Portuguese-speaking world highlighted key reference values underpinning journalistic self-regulation in the Lusophone world. Interpreting normative documents that strongly influence working

realities offers insight into the rationales that have shaped professional standards and the idealised conduct expected of those responsible for informing their societies.

Three main questions guided our analysis: how these codes are characterised (RQ1), which values underpin them (RQ2), and where these values converge and diverge (RQ3). The analysis highlighted the bodies responsible for creating and implementing these standards — notably professional and occupational organisations — the length and structure of the documents, the journalistic values they express, and the recommendations for conduct in everyday professional situations. The codes also address forms of contact and interaction between journalists and society, as well as elements of professional self-affirmation, aspects that extend beyond the narrower confines of producing content and merely providing information.

While the study shows that some countries have developed their own normative path in journalism, a notable group of cases remains distinguished by their structural and content-based proximity to the codes of ethics adopted by Portuguese journalists. São Tomé and Príncipe and Macau, for example, have codes that are practically identical to the 1993 version of the *Código Deontológico* in Portugal. The Angolan code is also very similar, differing above all in the formulation and organisation of its provisions. The Mozambican case is more *sui generis*, having chosen to follow the model of the 1996 Portuguese code, which was more closely associated with the socioprofessional context of the Carnation Revolution.

Hypotheses relating to colonial legacies and post-colonial traces may help to explain these occurrences. However, any categorical assertion would depend on further studies based, above all, on an archaeology of local thought and on the development of journalistic self-regulation itself across the various territories analysed.

However, a more in-depth analysis of this issue would also require examining the Western origins of the inspiration behind the Portuguese code.

Except for Brazil, which produced its first document in 1949, journalism codes of ethics in the Lusophone world are relatively recent when considered against the international context in which these self-regulatory instruments were adopted. The most recent are those of Angola and São Tomé and Príncipe, while the oldest are those of Brazil and Portugal.

Although they originated in discussions within the professional categories themselves (*intra corporis*), a substantial proportion of codes of ethics receive State support, with the State seeking to reinforce these documents' moral character through legislation. In Guinea-Bissau and São Tomé and Príncipe, for example, journalists waited for the respective States to approve their codes. In Cabo Verde, the Government required endorsement at a general meeting of journalists. In Angola, the code of ethics was approved at a meeting of the Ordinary Assembly of Journalists, supervised by the Regulatory Authority for the Media. In Timor-Leste, the Press Council — which operates as the regulatory authority for social communication — went so far as to render *the Código de Ética dos Jornalistas*, approved in October 2013, a dead letter, reviving it in a new version in 2017. The Press Council justified this by arguing that it should not accept responsibility for regulating a normative document it had not approved. In Portugal, a substantial part of the code of ethics likewise acquired the force of law, having been incorporated into Article 14 of the Journalists' Statute (Lei n.º

1/99, 1999), the law governing the profession in Portugal. Only Brazil and Mozambique appear to depart from this pattern, seeking to distance themselves from State oversight in favour of professional autonomy comparable to that found in countries such as the United States, the Netherlands and Germany, among others, but without the same mechanisms for monitoring how such autonomy operates.

When the codes of the Lusophone territories are compared with the global debate, no major discrepancies emerge. There is, in fact, a fruitful dialogue, with clear echoes of the values that are most central to journalistic practice. Statements on journalists' role in reaffirming democracy and human rights appear, alongside the valorisation of journalism as a social instrument. Most of the documents analysed omit aspects related to new technologies, but these omissions are not exclusive to the Lusophone world.

The limitations of this study should be acknowledged, both in terms of the number of documents analysed — nine — and in terms of the interpretative categories and the linguistic and cultural scope. Nevertheless, these are documents that broadly and transversally represent journalists in the Lusophone world.

Journalistic ethics cannot be assessed solely through the analysis of codes of ethics. Future research is therefore both necessary and welcome, particularly research addressing the bodies responsible for applying such codes (such as the ethics committees of trade unions in Brazil, for example), the effectiveness of their sanctions, and the resulting capacity for collective procedural improvement. It also seems important for further studies to document in greater depth the development of the ethical and self-regulatory systems in each of the contexts outlined here, examining, on the one hand, their historical-descriptive dimension and, on the other, their normative dimension, both of which were addressed jointly, and therefore necessarily more superficially, in the initial approach to the subject presented in this article. These future studies, drawing on sociological, anthropological, and historical approaches, will not only help assess the complexities of the landscape but may, above all, help identify pathways toward developing forms of journalism that are more ethical, autonomous, and responsive to local social demands.

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