

DEVELOPMENT OF JOURNALISM ETHICS: A COMPARATIVE ANALYSIS OF CODES OF ETHICS IN NIGERIA, UNITED KINGDOM, UNITED STATES OF AMERICA, INDIA AND RUSSIA

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Abstract

Journalism codes of ethics are developed to guide journalists through their day-to-day encounter with ethical dilemma in the course of discharging method to find the similarities and differences in codes of ethics as promulgated their duties. The codes and canons provide journalists a framework for self-monitoring and self-correction. This subset of media ethics is widely known to journalists as their professional “codes of ethics” or the “canons of journalism”. However, efforts by professional journalism bodies to come up with universally acceptable standards of codes of ethics is still suffering setback because most codes of ethics are rooted in the socio-cultural, religious and political milieu of the countries they emanated from. The researcher had used comparative by five countries under review. There are several common cognitions such as truth and accuracy that are central values in journalism ethical codes of the five countries despite the fact that they were built on diverse nations’ politics and cultures. However, the five nations possess different regulations, yet, the researcher attempts to interpret the advantages while ignoring the drawbacks from those mentioned countries’ codes for the purpose of developing a code of ethics to guide journalists to run their duty with universal values in the journalism practicing industry.

Keywords: *Code of Ethics; media ethics; journalism; comparative analysis; profession*

PEMBANGUNAN ETIKA KEWARTAWANAN: ANALISIS PERBANDINGAN KOD-KOD ETIKA DI NIGERIA, ENGLAND, AMERIKA SYARIKAT, INDIA DAN RUSSIA

Abstrak

Kod etika kewartawanan adalah dibentuk untuk menjadi garis panduan kepada wartawan dalam kerja harian untuk menghadapi dilema etika dalam melaksanakan tugas. Kod atau ‘meriam’ ini menyediakan suatu rangkakerja untuk pemantauan sendiri dan pembetulan sendiri. Sebagai *subset* dalam etika media ini telah diketahui kepada wartawan sebagai “kod etika” atau “meriam kewartawanan. Walau bagaimanapun, usaha oleh badan-badan professional kewartawanan untuk mendapatkan suatu kod etika yang piawainya boleh diterima secara sejagat masih menghadapi masalah kerana kebanyakan kod etika ini adalah dihasilkan daripada pengaruh-pengaruh sosio-budaya, agama dan politik di negara masing-masing. Pengkaji telah menggunakan kaedah perbandingan untuk memperolehi persamaan dan perbezaan di dalam kod-kod etika daripada lima negara yang dikaji. Terdapat beberapa persamaan kognitif seperti kebenaran dan ketepatan yang menjadi nilai penengah kepada kod etika kewartawanan daripada lima negara ini walaupun pada asasnya, ia dibina daripada kepelbagaian politik dan budaya setiap negara. Walaupun kelima-lima negara ini mempunyai peraturan yang berbeza, namun, pengkaji telah berusaha untuk mengintepretasi kelebihan dengan mengabaikan kelemahan setiap kod negara yang dikaji dengan tujuan untuk membangunkan suatu kod etika dalam memandu wartawan untuk melaksanakan tugas mereka berasaskan satu nilai yang sejagat dalam industri amalan kewartawanan ini.

Katakunci: *Kod etika; etika media; kewartawanan; analisis perbandingan; profesion*

INTRODUCTION

Over the years ethics has gone from being an individual and societal issue or practice to become a necessity in various professions and organizations, i.e. various organizations and professions have deemed it fit to create code of ethics that guides their practice and practitioners on how they should conduct themselves, and, what is expected of them in the line of duty. Journalism, just like any other profession is no stranger to the term ethics, because of the sensitivity of this profession which is vested with the burden of disseminating information and keeping the public well informed about the daily happenings in the society and the world. It behooves media practitioners to have a code of ethics that ensure an unbiased representation of situations or haphazard reporting which could be very damaging. The gravity of the role journalism plays in our society, government and world at large has been summarized in the quote by the campaigning *Victorian* journalist, William Thomas Stead below:

*“I have seen Cabinets upset, ministers driven into retirement,
laws repealed, great social reforms initiated, Bills transformed,
estimates remodeled, programs modified, Acts passed, generals
nominated, governors appointed, armies sent hither and thither,
wars proclaimed and wars averted, by the agency of news-papers.”*

(Snoddy, 1992)

In the same vein, the concern over practices in today’s media was also raised by Phillips (2010) who stated that news cannibalization and yellow journalism have become the other of the day and media houses are more concerned with who breaks the news first than who has the accurate

news (Lazaroiu, 2011). She also argued that the current influx of information technology which has given rise to online journalism, makes it harder for ethics to be respected and practiced, as a result she called for the need of codes of ethics to be created for online reporters or writers. The concerns raised by many studies bring to fore the fact that creativity, objectivity, and truth are being eroded because, with the issue of control, money, and ratings still burning deep in journalism practice it becomes an upheaval task to adhere to ethics (Phillips, 2010). The above concerns have been summarized in an old newsroom joke of the three rules of journalism below:

“Make it juicy, Make it brief, Make it up’

(Richards, 2005).

Be that as it may, it does not negate the fact that codes of ethics are still very much necessary and crucial in journalism and these codes to a large extent set the practitioners apart, while there may be unanimous agreements on ethics such as truth and accuracy, there are also variations in terms of priority and peculiarity of these ethics in different regions and countries.

However, all scholars mentioned had focused on the aspect of finding the common values through analyzing existing ethical codes, but what still eludes them is that they have not been able to pay attention in the context of developing a comprehensive and applicable codes of ethics which will stand the test of time especially in some severe media-controlling countries of the world. From the point of view of this study, those countries should not be ignored by scholars if they try to establish a universal ethical framework to journalism. In this article, the researchers seek not only finding universal ethical values through comparative analysis, but also attempts to interpret the advantages while ignoring the drawbacks from five mentioned countries' codes for the purpose of developing a code of ethics to guide journalists to run their duties with universal values.

It is a known fact that there is no uniform code of ethics among journalists around the world. Even when some rights are being stipulated in their individual codes, they are not simply put into practice, probably as a result of restrictions on them by the government of those countries, religions, and other factors. This lack of internationalism in journalism ethics poses dangers to the international community since foreign news coverage can influence international relations in this era of globalization. Hence, it is salient to make a comparison on the code of ethics of journalists around the world to identify their areas of strengths and weaknesses with a view to developing a universally acceptable code.

METHODOLOGY

This research analyzes five media codes of ethics issued by the journalism associations of Nigeria, the United Kingdom, the United States of America, India, and Russia. The following codes and regulations covered in this research are as follows:

- **Nigeria:** The Nigeria Union of Journalist (NUJ) code of ethics pretty much sums up most of the provisions of the IFJ codes of ethics but with a few exceptions that are not very popular with general codes of ethics. The code of ethics of the Nigerian Union of Journalists was adopted in March 18-20th 1998. The Nigerian "Press Council" organised the Ilorin Forum, where the Nigerian Press Organisation formally ratified this new Code.). The NUJ code of conduct was however updated in 2011.
- **The United Kingdom:** NUJ Code of Conduct was adopted by the National Union of Journalists in 2007. The NUJ's Code of Conduct has set out the main principles of British and Irish journalism since 1936, it was updated in 2007.
- **The United States of America:** The Society of Professional Journalists (SPJ) code of ethics was adopted by the 1996 SPJ National Convention.
- **India:** This code of ethics was adopted by the Press Council of India (PCI) 2005 edition. The press council of India is the most detailed and the longest in terms of provision of ethical codes. It is also the only one

established by an act amongst all five codes of ethics.

- Russia: The Congress of Russian journalists (CRJ) on 23 June 1994 in Moscow adopted this code of ethics. The code of ethics is applicable to all journalists in the country and goes beyond the universal ethics to address certain ethics that are not common but also very important in journalism practice.

Text analysis using comparative method was done to find the similarities and differences in code of ethics as promulgated by five countries, and, was applied in order to: (a) Finding universal ethical values in the five codes under review as the fundamental of new ethical code. (b) Seeking the applicable balancing point where they do not agree which will suit different nations' political and cultural backgrounds. (c) Putting together common values inherent in the codes to form a comprehensive new code of ethics in journalism with universal values.

FINDING

Similarities

This part of the study compares the above mentioned journalism codes in detail with a view to seeking universal values of ethics as the new ethical code that will suit all mentioned countries. While various existing codes have some differences, most share common elements including the principles of truthfulness, accuracy, objectivity, impartiality, fairness and public accountability; as these apply to the acquisition of newsworthy information and its subsequent dissemination to the public.

As stated earlier, all five countries share certain common rules and practices that are expected of journalists in their countries. They are generally in accord on the issue of truthfulness which embodies other principles such as accuracy, objectivity, fact verification, honesty, and fairness in information gathering. A previous research reveals that the above mentioned principles have been very prominent over the years in researches carried out at different times in different countries or continents (Laitila, 1995, cited by Himelboim & Limor, 2008). The issue of avoiding discrimination, prompt rectification of inaccurate information, respect of privacy, avoiding stereotypes, distinguish between adverts and news as well as refusal of awards or gifts in exchange of information or coverage are also prominent in all five countries codes of ethics, as it is believed to be a source of bias and questions the integrity of the news report. Respect of dignity of sources or victims is also another common ethics, which cuts across the board in all five countries, with all stressing the special protection of minors or sexual

assault victims as well as their relatives. The protection of public interest at all times is also a unanimous rule, and all five countries forbid the distortion of facts or the sensationalization of stories or headlines to gain followership or hike profit as it could mislead or lead to various damage in the society. While anti-plagiarism may have been common in all five countries, only about two of them stressed on copy right issues, laws and other related matters such as attribution and acknowledgement. These universal values as evident in all five codes are not far-fetched as most of the rules make the general cardinal rule of journalistic practice right from the west where it all began, as these codes can be found in the IFJ codes of ethics and the United Nations codes for journalists, which is deemed the universal standard.

There are many related researches in the past that dealt with this area. For instance, Laitila's (1995) comparative study of journalistic codes from 31 European countries found a high level of agreement on six principles: truthfulness of information, clarity of information, defence of the public's rights, responsibilities in forming public opinion, attention to standards of gathering and presenting information, and respect for the integrity of sources. Indeed, similar researches never stop in journalism ethical field because of its importance. The findings of previous research could help the researcher to as well find the universal values from present and past codes of ethics in journalism. In a related article by Roberto Herscher (2002) titled "A universal code of journalism ethics: problems, limitations, and proposal". The study proposed that a universal code of ethics is indeed desirable and attainable. According to the study, it will help solve the problems created by government, economic groups, and journalists around the world who hide behind ideas of cultural relativism to defend communication systems that keep them in power and the people in ignorance. The following are some examples of common values inherent in the five codes of ethics under review:

Truth and Accuracy

No ethical codes in journalism could ignore these words such as "accuracy" and "truth", which enough illustrated truth and accuracy information as lifeblood for news reporting. The selection of phrases and passages of the five ethical codes in Table 1 confirms this conclusion as well. Although journalists valued truth telling as a basic ethical principle, they are willing to weigh truth against competing principles. For example, "respect or protects someone's privacy" (Shakuntala Rao, 2005 : 115). Indeed, the ethical conflict always happened when making a decision whether journalist should publish all truth or not. Unconditional truth is supposed Kant's philosophy of ethics, "categorical imperative" but it always ignores the consequence of the act, which could not suit for present-day journalists' practices. By contrast, the conception of "tell the truth with restraint" has shown more practical values which considers both truth and real situations.

For instance, a complaint was filed against a CNN-IBN programme '*Face the*

Nation’ - Phaneesh Murthy’s case: *Is sexual harassment in work place a double edged sword?* Aired on May 22, 2013 on CNN-IBN. CNN-IBN’s deputy editor Sagarika Ghose anchored the program. The complainant, Ms. Roiz who is herself a complainant in a long-pending sexual harassment case, said that her name was revealed in a slide and inaccurate information was given that her case was quashed, when in fact, the complaint filed in 2007, was still pending. By giving this news, the broadcaster had prejudiced matters and viewers would tend to believe that there was no case pending in any court of law, she contended. CNN-IBN, represented at the News Broadcasting Standards Authority (NBSA) hearing by its legal counsel and its Director, News, said that information related to her case was in the public domain and their information was based on research regarding sexual harassment cases.

Table 1: Accuracy In Journalism Codes (Selection)

	Phrases or passages
Nigeria (NUJ)	“The public has a right to know. Factual, accurate, and balanced and fair reporting is the ultimate objective of good journalism and the basis of earning public trust and confidence.” Sec. 2 (1)
The United Kingdom (NUJ)	“Information disseminated is honestly conveyed, accurate, and fair.” Sec. (2)
The United States (SPJ)	“Test the accuracy of information from all sources and exercise care to avoid inadvertent error. Deliberate distortion is never permissible” Sec.1(1)
India (PCI)	“The press shall eschew publication of inaccurate, baseless, graceless, misleading or distorted material. All sides of the core issue or subject should be reported. Unjustified rumors and surmises should not be set forth as facts.” Sec.1(1)
Russia (CRJ)	“A journalist disseminates and comments only information of whose reliability he is convinced and the source of which is well known to him. He will do his utmost to avoid damage to any party due to its incompleteness or inaccuracy, deliberate concealment of socially important information or dissemination of information known to be false.” Sec.3

The NBSA order said that the ‘broadcaster was unable to justify their action, especially with reference to Rule 4 of the ‘Guidelines on reportage of cases of sexual assault’ which provides that in reporting cases of sexual assault on women to respect their privacy, names, photographs and other details that may lead to disclosure of their identity should not be broadcast or divulged.’ Holding the broadcaster in breach of these guidelines as well as in respect of provision on accuracy, the NBSA issued a warning to CNN-IBN for breach of the News Broadcasters’ Association (NBA) Code of Ethics and Broadcasting Standards and Guidelines and also for willful violation of the ‘Guidelines on Reportage of

Cases of Sexual Assault.’ CNN-IBN was also directed to issue a written apology on the company letterhead to the complainant and they also provided the text for the apology.

Privacy and public interest

Privacy, as one of basic human rights, is adopted by all journalism codes of ethics in the five countries (Table 2). That, respect the privacy rights of individuals and families was beyond the bounding wall of geography, nation, culture, and religious limit, which exist in five media ethics. As one journalist put it: "*We are human beings first and journalists second.*" Moreover, public interest is not good basis for ethical decision especially when other person's privacy is the issue. There are many immoral reporting cases which had happened and aroused widespread public attention. It is likely an opposite example to remind media practitioners how important privacy is. At the same time, when conflicts happened

Table 2: Privacy in Journalism Codes

	Phrase or Passage
Nigeria (NUJ)	“As a general rule, a journalist should respect the privacy of individuals and their families unless it affects public interest.” Sec.3
United Kingdom (NUJ)	“Does nothing to intrude into anybody private life.” Sec.6
The United States of America (SPJ)	“Recognize that private people have a greater right to control information about themselves than do public officials and others who seek power, influence or attention. Only an overriding public need can justify intrusion into anyone’s privacy.”Sec.2 (4)
India (PCI)	“The Press shall not intrude or invade the privacy of an individual, unless outweighed by genuine overriding public interest, not being a prurient or morbid curiosity.” Sec.6 (1)
Russia (CRJ)	“A journalist respects professional secrecy in relation to the source of any information that is acquired in a confidential way. Sec.4

between public interest and one’s privacy as professional media practitioners, how they could make decision. It was addressed as “the scandal of Kate Middleton’s topless photo”. The Duchess of Cambridge, Kate Middleton. The Duchess was on a holiday with her husband Prince William at a private chateau in France when the photos were taken, presumably with extreme zoom lens. The photos were first published by the French magazine Closer (14. Sept.

2012), and subsequently taken up by Italian and Irish publications. The scandal over the topless photos of Kate Middleton in a French magazine has opened the floodgates on a debate over media ethics on both sides of the channel. The Duchess of Cambridge, along with her husband, Prince William, has launched legal action against the publishers for breach of privacy.

However, ignoring minor things elicits avoidable litigations. What media practitioners need more concerned about is the increasingly derailing media norms and ethics at a time when it practically takes seconds for information to reach each corner of the world. Today’s media are struggling to find news that would increase their circulation and thereby making profits. The print media is increasingly becoming redundant in the world, mainly due to the online media and a fall in reading habit and time among young audiences. In such a scenario, the publications are desperate to find anything that can boost their sales. Of course, the decision to publish Kate’s bare-chested pictures would have taken place after considerable deliberation from the publication’s editorial heads. It would have been obvious to the editors of these publications that printing those photos were not ethical from a media ethical perspective.

Integrity

When it comes to moral word "integrity", people would associate with more words in existing ethical codes such as "equity" and "fairness" (Table 3). All of them make a contribution to protect ethics of news. Actually, "integrity" has not been ignored by any country's ethical codes. There are much content about integrity in journalism ethical codes. For instance, "Resists threats or any other inducements to influence, distort or

Table 3: Integrity in Journalism Codes (Selection)

Phrases or passages	
Nigeria (NUJ)	“A journalist should neither solicit nor accept bribes, gratifications or patronage to suppress or publish information.” Sec.7(1)
United kingdom(NUJ)	“Resists threats or any other inducements to influence, distort or suppress information and takes no unfair personal advantage” Sec. 8
The United States of America (SPJ)	“Avoid conflicts of interest, real or perceived (Sec.3.1)Remain free of associations and activities that may compromise integrity or damage credibility” Sec.3 (2)
India (PCI)	“Journalists shall not exploit their status for non-journalistic purposes.” Sec.8
Russia (CRJ)	“A journalist refuses an assignment if to fulfil it he will have to violate one of above-mentioned principles.” Sec.9

suppress information and takes no unfair personal advantage” (United Kingdom, NUJ. Sec.8). However, many cases with lack of “integrity” still happened in society such as “paid news” which was called as the bane of ethical journalism. The practice that involves money in unethically acquiring media space for the beneficiaries remained an important issue in India for many years. But lately, a number of influential media persons’ organizations have shown their concern with this kind of journalism in the country. The practice of offering envelopes to reporters remained visible across Asian media and especially India and China for decades. The practice appears to be becoming institutional, not by poverty-stricken reporters but by the publishers themselves. Moreover, it is alleged that many media houses in India, irrespective of their volume of business have started selling news space after some “understandings” with politicians and corporate people without disguising those items as advertisements.

In that situation, The “consumerist model in journalism” would be defined, which means under the consumerist model the manufacture of news is profit driven; news is seen primarily as a business enterprise, with news as a commodity. Of course, in the commercial society, it is undeniable that media organizations need to earn money to supposedly increasing daily spending without releasing news. As Merrill (2002b) noted “What we don’t want to do is to push media ethics over into a corner. We don’t want to de-emphasize its importance. We don’t want to begin considering journalism as simply a business and not a public service.” (p. 23) Actually, it is such sad thing if the aim of media practices only to seek financial benefits.

Differences

With the existence of different cultures, values, religions, traditions, and government policies, it is clearly expected that some disparities would be evident in the codes of ethics of the five countries discussed (Himelboim & Limor, 2008; Hafez, 2002; Mowlana, 2007). As a result of this, one of the rules the IFJ highlights is the necessity for various organisations or countries to establish their own codes of ethics that are practicable in their terrain, (without losing sight of the core values) while using the IFJ code as a yardstick. The peculiarity of different territories is evident in what ethical rules are given priorities in their codes of ethics. However, the difference in the codes could be found in codes of the Press Council of India and the Congress of Russia Journalists as against other codes with respect to publication of blasphemous and pornographic stories.

Obscenity, vulgarity & Blasphemy be eschewed:

For instance, codes of ethics of the Press Council of India and Congress of Russian Journalists vehemently speak against pornographic publications, but others are quite silent over that. They also talk about wrongful and debased portrayal of religious characters and exploitation of the name of prophets, deities, seers and anything that is considered repugnant to journalistic ethical codes. Example of a nude case was that brought before the disciplinary committee

of the media council of Republic of Uganda by Pastor Martin Sempa against the Red Pepper Publications Limited which complaint may be summarized as follows: The Red Pepper Publications Limited on the 23rd March 2004 falsely and maliciously placed and published the Complainants mobile-phone number 077 641 028 in the classified section of its Newspaper at page 13 with message... *"a gorgeous Makerere University baby is looking for any romantic, financially stable and ready for a long term relationship. For details call 077641 028..."* The complainant argued that by publishing his mobile phone number thus, the respondent maliciously attacked his person, improperly infringed on his privacy, damaged his reputation as a religious leader and brought ridicule to his person and that by the said publication the respondent's journalists breached Rules 1, 8 & 9 of the Code. The Complainant further argued that Red Pepper Publications Limited chronically publishes pornographic and obscene material that tended to offend and corrupt public morals; that the said publications contravened section 166 (1) of the Penal Code and are also contrary to public morality. In accordance with Section 33 of the Act the Committee further orders as follows:

- i. The respondent shall in two separate publications publish in its Newspaper, the Red pepper, a prominent unequivocal apology to the complainant for having published his mobile phone number and infringed upon his privacy;
- ii. The respondent shall pay to the complainant Ushs. 5,000,000/= as damages for the inconvenience and injury caused to the complainant;
- iii. Bearing in the mind the time taken and that the complainant was not represented by counsel, the committee order that the respondent shall pay costs of 300,000/= to the complainant.

In the area of blasphemy, it is imperative to analyse the controversy that erupted after the publication of the cartoons of Prophet Mohammed by a Danish newspaper the Jyllands-Posten with special reference to Indian media. The publication of cartoons of Prophet Mohammed in the Danish newspaper Jylland-Posten led to outrage, boycott calls and violence in many countries. People were killed, newspapers were closed and editors sacked. The controversy has been narrated as a clash between two civilizations. It has also been described as an encounter between

Table 4: Obscenity, Vulgarity & Blasphemy Be Eschewed (Selection)

Phrases or Passages	
India (PCI)	Newspapers shall not display advertisements which are vulgar or which, through depiction of a woman in nude or lewd posture, provoke lecherous attention of males as if she herself was a commercial commodity for sale. Sec.17(2)

“Newspapers should not publish any fictional literature distorting and portraying the religious characters in an adverse light and offending the religious susceptibilities of large sections of society who hold those characters in high esteem, invested with attributes of virtuous and lofty.” Sec.22 (4)

“Commercial exploitation of the name of prophets, seers or deities is repugnant to journalistic ethics and good taste.” Sec.22 (5)

Russia (CRJ)

“A journalist respects the honour and dignity of the people who become the objects of his professional attention. He refrains from any derogatory allusions or comments in relation to race, nationality, skin colour, religion, social origin or sex as well as to a physical handicap or disease.” Sec.5

freedom of expression and religious fundamentalism. While many cited the publication of the cartoon as an example of irresponsible journalism, another section stood by the Danish newspaper, arguing for the unlimited freedom for the press. Similarly, India has also witnessed protests in different parts of the country including Delhi and Mumbai. Four persons were killed in Luknow, the capital city of Uttar Pradesh. Political parties have expressed solidarity with the minority Muslim community. The state elections for various legislative assemblies in April-March 2006 compelled political parties to organize demonstrations against western media accusing it of anti-Islamic propaganda. The Government of India expressed deep concern over the controversy and suggested to the Danish government that it seeks an assurance from the newspaper that it would not publish such cartoons in future. Anticipating a communal clash, the Prime Minister of India came out with a statement, saying (Mujataba S.Ali, 2006 Sept.29),

“It is incumbent on all of us to be sensitive to the beliefs and sentiments of other and avoid all actions that cause hurt to them [Muslim Community]. India’s commitment to religious harmony and tolerance is unshakable and actions that cause hurt to the sentiments of any part of our people are not acceptable.”

DISCUSSION AND SUGGESTION

Recommended new universal code of ethics:

It is difficult however to say through this study which code is best or worst amongst the journalism codes adopted by Nigeria, the UK, the US, India, and Russia. As the researchers attempts to interpret the advantages while ignoring the possible setbacks from those mentioned countries’ codes for the purpose of developing a code of ethics to guide journalists to run their duty with universal values in the journalism practicing industry, the following details of comprehensive new code of ethics in journalism are recommended:

- **Be Honest:** Journalist should be honest, fair, truthful, accurate in their gathering, reporting, and interpreting of information. They should hold honesty in high regards in dispensing their duty in such a manner that can be vouched for by the public, their organization and colleagues.
- **Empathy:** Journalists should always treat sources, subjects and colleagues as human deserving of respect, showing empathy for those who may be affected adversely by news coverage. Use special sensitivity when dealing with children and inexperienced sources or subjects also respect privacy of individuals and their family unless it affects public interest.
- **Internationalism:** Journalist should enhance international communication and cultivate international vision of themselves; Respect other nations' sovereignty, national tradition, religious belief and cultural diversity in international media activities.
- **Clause of Conscience:** Journalists must have the right to act according to their conscience in the exercise of journalism. In case of fundamental change in the political, philosophical or religious line of the employer, a journalist may put an end to his or her contract, without notice, and be paid compensation equivalent to what he or she would have received in case of termination of his or her contract by the employer.
- **Discrimination:** Journalists shall be aware of the danger of discrimination being furthered by the media, and shall do the utmost to avoid facilitating such discrimination based on, among other things, race, sex, sexual orientation, language, religion, political or other opinions, and national or social origins.
- **Security:** Journalists in the field should not be left unprotected by their organisations especially during wars or conflicts. Adequate support should be given to them and their families at such times and also when they expose unethical practices in the profession or external pressures that may endanger their lives.
- **Privilege/non-disclosure:** Journalists should not breach trust of sources by revealing information that was gotten off-record, and also the universal law of confidentiality should be upheld except in instances where it may affect public interest.
- **Loyalty:** Journalist respects and defends the professional rights of his colleagues and observes the laws of fair competition. Journalist keeps away from situations in which he might cause harm to the personal or professional interests of his colleagues, by agreeing to fulfil their duties in conditions which are fare well known to be socially, materially or morally less favoured.
- **Violence & Conflicts:** News, views or comments relating to communal or religious disputes/clashes shall be published after proper verification of facts and presented with due caution and restraint in a manner which is conducive to the creation of an atmosphere congenial to communal

harmony, amity and peace. Sensational, provocative and alarming headlines are to be avoided. Acts of communal violence or vandalism shall be reported in a manner as may not undermine the people's confidence in the law and order machinery of the State.

- **Copyright/Plagiarism:** Journalists are prohibited from plagiarising the work of another, and if at any time they intend to use the work of another it must be done only when consent from the author is obtained or due attribution and acknowledgement is given. Plagiarism cripples the flow of creativity and originality which are an important aspect of journalism. Copyright laws are also applicable to journalists in their practice, if a journalist is found guilty of copy right violation, this organization will not give its support or resources for the defence of the accused.
- **Decency:** Journalists should always be seen as representatives of a respected body in their appearance, composure, language and the manner with which they conduct themselves on the field. Journalists are urged to be decent at all times.
- **Completeness:** The story is complete if journalists know they have (or can gather) more information that is relevant, important, or necessary for understanding the situation. A half truth is in part a lie. The information must be complete, and, as with most other such principles, each case must be analyzed individually to see how this can be achieved. This concept of completeness should be given a pivotal place in codes of ethics in journalism.
- **Moonlighting:** Moonlighting is a situation whereby someone who is already working has a second job that he / she does secretly, usually without paying tax on the extra money earned. Moonlighting journalists focus attention on the real or potential conflict between a commitment to the profession and to the public trust and commitment to other employers or extraneous interest. All the codes of ethics under review are silent on this concept. This should be reflected in our new codes to prevent journalists from moonlighting.
- **Science:** Because science deals largely with accepted facts or scientific consensus, it can illuminate some of the common complaints levelled at journalistic standards and practices. For all these and related reasons, science reporting should be on some leading edges of journalism which all five countries under review including International Federation of Journalists (IFJ) did put into consideration.

CONCLUSION

In this article, the researchers have tried to come up with a new code of ethics in journalism through a comparison of five codes of ethics in five countries such as: (Nigeria, the UK, the US, India, and Russia). Moreover, the comparative study shown above, discusses three core principles that form the backbone of any

global media ethics code. Those three principles are: truth and accuracy, privacy and public interest, and integrity. However, the only difference from the codes is from that of the Press Council of India (PCI) and Congress of Russian Journalists (CRJ) which vehemently speak against pornographic publications and also talks about wrongful and debased portrayal of religious characters and exploitation of the name of prophets, deities, seers and anything that is considered repugnant to journalistic ethical codes. It is very obvious from the foregoing that unions and organization understand the importance of having codes of ethics that guide the practice of journalists in their countries. While some maybe general, others more streamlined, peculiar, and precise. There is no gainsaying however that all codes are equally important and to a large extent serve their purposes. For future research in this area, attention should be paid to the feasibility of new ethical code in some countries with prominent characteristics of policy and religion such as Russia, China and Middle East countries.

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Appendix: A. Codes of Journalism Ethics

Nigeria

Codes of Ethics. Adopted by the Nigerian Union of Journalists in March 20th 1998. Source: www.unesco.org/new/fileadmin/multimedia/Hq/CI/WPDF2009.

United Kingdom

NUJ Code of Conduct. Adopted by the National Union of Journalists in 2007. The NUJ's Code of Conduct has set out the main principles of British and Irish journalism since 1936, it was updated in 2007. Source: Retrieved November 10, 2012, from: <http://www.nuj.org.uk/>

USA

Codes of ethics. Adopted by the Society of Professional Journalists in 1996. Source: Eugene S. Pulliam National Journalism Center, 3909 N. Meridian St., Indianapolis, IN 46208
317/927-8000 | Fax: 317/920-4789 | Contact SPJ Headquarters |
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India

Codes of Ethics. Adopted by the Press Council of India 2005 edition. www.journalism-islam.de/codes.html

Russia

Code of Ethics. Adopted by the Congress of Journalists of Russia in June 23, 1994. Source: www.google.com.my/

