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Dr. phil. Michael Yao Wodui Serwornoo

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An Examination of Journalistic Codes of Ethics in Anglophone West Africa

Dr. phil. Michael Yao Wodui Serwornoo, PhD 🕞

Erich Brost Institute for International Journalism, School of International and Intercultural Communication (SIIC), TU Dortmund, Dortmund, Germany

ABSTRACT

Ethical scandals involving journalists in English-speaking West African countries have been documented to include conflict of interest, freebies, intellectual theft, deception, carelessness, kowtowing to advertisers and politicians, use of dubious evidence, and outright bias. This study explores how pronounced and clear the rules relating to these breaches are in the codes of these countries and whether the similarities and dissimilarities in wording indicate the influence of individual actors involved in writing them. Relying on thematic and qualitative document analysis methods, the study found that rules in the codes addressing the ethical breaches are pronounced and clear. Although largely similar in content, the codes also feature important differences that are strongly related to the composition of the groups that wrote them. This study discusses why ethical challenges in these countries persist in the midst well-written code of ethics.

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Journalism ethics falls within the bigger picture of media ethics and accountability (Hafez, 2002). When ethics codes are completely developed by journalists, they are considered as self-regulatory instruments (Eberwein, Fengler, & Karmasin, 2018) that provide an opportunity for journalists to negotiate through the particular media system/regime within which they operate to stay effective. But these notions have been rarely explored when it comes to the mass media in Asia, Africa, and Latin America. The literature, rather, highlights the continued repression and intimidation of the media by governments and state institutions in these regions at the expense of opportunities offered by media accountability and self-regulation for journalists to stay effective in their practice (Bertrand, 2000). A good example is that in certain repressive regimes, truth is no defence against defamation of the state (Glanville & Heawood, 2009), and as a result, journalists would need to guide each other on how to negotiate this severe threat in holding government accountable.

It is imperative to stress that concentrating on English-speaking West Africa, which includes Ghana, Nigeria, Sierra Leone, Liberia, and the Gambia, represents a meritorious subregional perspective on journalism ethics for countries that have shared common colonial history, language, and democratic path. According to Ibelema and Bosch (2009), the media in these five countries are 160 years older and freer than their Francophone and East African counterparts. However, they share stark similarities and sharp differences when it comes to journalism ethics. The codes of ethics in these countries were largely written by journalists with technical assistance from the Friedrich Ebert Stiftung (FES) and other active civil society organisations. Adopting bodies or actors in this study include the associations (journalists, publishers, civil society organizations and government institutions) that participated in the writing and promulgation of the codes. The literature seems to suggest that codes with government participation in their formulation are nothing but orders



(Bertrand, 2000), and those with immense technical assistance are but a product of the aspirations of the media development agency that paid for the technical assistance (Hamelink, 2011). However, the focus of this study is not to establish the power relation involved in the formulation and promulgation of the codes but rather to establish the group of actors that participated in the exercise and whether that had any influence on the wording of the content of the codes.

The weak enforcement of these codes has led generally to the call for stricter versions. In Nigeria, for example, the parliament attempted to usurp the power of the Nigerian Press Council by turning the press code into a bill. Ifeduba (2014) argued that the Nigerian Press Council, after 20 years, resolved just 17 of the 150 complaints it received. He, however, contended that both government/ press collaboration and press self-regulation models of press accountability that have been tried in Nigeria failed to fulfil their mandates satisfactorily for reasons that go beyond political interference and lack of public trust" (p. 702). The Ghanaian press code is generally referred to as a toothless lion because of the inability to enforce its content. Sierra Leone operates a statutory code, which is virtually a law, and yet the government continues to seek stricter enforcement.

Interestingly, however, the focus of the debate about media in developing countries is woven around freedom of the press with an assumption that once there is a guarantee of freedom of the press by governments and states, the subsequent effect is a free media performing its rightful duties. This notion remains a misconception because there are several other elements that are required to ensure that guarantees given to the media are maintained and properly applied for the benefit of the larger society, including the press as an institution and informed, discerning audiences (Hafez, 2002; Nyamnjoh, 1999). In any case, repressions in transformation countries such as those in West Africa remains a reality. The puzzle then is how journalists can stay effective within these conditions.

Formal journalism codes of ethics provide one sure avenue for journalists to regulate their own practice to some extent. The concentration of this study on Anglophone West Africa is useful because it relates to the idea of dewesternization of mass media discourse about developing countries to recognize that many of the limits to public debates in Asia and Africa are rooted in the social values and professional norms that are not necessarily controlled by the state (Christians & Traber, 1997; Hafez, 2002). The commitment of journalists in developing countries to self-regulate is crucial for the media's development. It is essential to note that most of the journalist associations in the selected countries received technical assistance and funding from European donor agencies in the formulation of codes, especially Ghana, Liberia, and the Gambia. The role of the consultants and donors have accounted for the immense similarities in the codes of ethics around the world (Hamelink, 2011). However, it is not clear whether the omissions of African traditional values, which in any case, are respected by the African journalists, represents the influence of these consultants. Contemporary Ghanaian journalism carries traces of being less antagonistic to African traditions, and it is progressively shaped by African narrative practices through the appropriation of African traditions (see Hasty, 2005). Considering the Ghanaian case, it is unclear to what extent foreign technical assistance received by the Ghana Journalists Association (GJA) in the drafting of these codes resulted in the omission of such significant dimensions.

The code of conduct introduced in Kenya in 2001 had one crucial objective of ensuring that the media in that country is free from state controls and interference (FES & AWC, 2005). The literature that focused on European codes suggested that the code of ethics was one of the instruments useful for self-regulation (Eberwein et al., 2018; Fielden, 2012; Laitila, 1995; Rao, 2011). Laitila (1995) concluded that the common principles stressed in European codes included:

truthfulness of information, the prohibition of discrimination on the basis of race, sex, etc., fair means in gathering the information, integrity of the source and the journalist, and freedom of expression and comment. The differences and similarities between the national codes do not seem to follow any geographical, lingual or other traditional dividing lines. (p. 527)

The situation of the English-speaking West Africa was described by Kadhi (1999) as featuring startling ethical challenges facing journalists in English-speaking Africa. He argued that these

challenges range from conflict of interest, bribery, intellectual theft, kowtowing to advertisers and politicians, use of dubious evidence, and outright bias. Karikari (1996), in a similar manner, reasoned that the state of journalism practice in West Africa was appalling. Several other scholars have bemoaned how the African media, especially journalism in English-speaking African countries, grapple with credibility and internal problems resulting from similar ethical breaches (Ansah, 1996; Kadhi, 1999; Kasoma, 2000; Nyamnjoh, 1999).

Nyamnjoh (1999) described the West African media practice that followed press freedom across the region as the misbehaviour of journalists in the name of freedom. The professional impropriety transcends governments and political actors to the general public and fellow journalists. Blay-Amihere and Alabi (1996) described the West African press as practising journalistic hooliganism that is selective and irresponsible to the point of plunging their countries into war. Koomson (1996) recounted varied ethical violations in Ghana regarding social responsibility and public interest, professional integrity, respect for human rights, and the search for truth. The private press, set up for different sorts of agendas, are quick to publish one-sided stories (Blay-Amihere, Alabi, 1996). Blay-Amihere and Alabi (1996) lamented that even though journalists accept that the public has to be well-informed, they have failed to rise beyond distortions, half-truths, deliberate omissions, and outright falsehood, causing moral torture to a lot of people. The ethical standards aimed at mitigating the breaches listed, so far, are usually contained in the code of ethics and other media selfregulating instruments. But the existence of these instruments does not necessarily guarantee a scandal-free press. Hamelink (2011) offered an explanation to this situation with the argument that international communities, both governmental and nongovernmental organizations, have produced a "fairly large volume of moral standards for media practices around the world and codified these into both binding laws and voluntary self-imposed codes that remain quite ineffective" (p. 457). The role of international donors (FES, USAID, BBC Media Action, DW Academy) in media professionalization in Africa is more than just advisory. Although ignored mostly in African codes, cultural principles have become part of what Hafez (2002) called informal discourse on journalism ethics.

Laitila (1995) provided insight into adopting bodies of the 31 codes of ethics representing 29 countries in Europe. According to her, journalist unions and associations of journalists adopted 20 of the 31 European codes she studied. Press councils and joint journalists' and publishers' associations adopted five of these codes each. There is a single code adopted jointly by the state and journalists. And the special case of Denmark's code was not ignored in that analysis. Denmark's code is an act of parliament and, therefore, a law. The insight from Laitila's study indicates that journalists are capable of using the codes, rather than laws, to improve their practice and avoid ethical breaches. The agency of journalists demonstrated by this insight shows that they are equally capable of formulating codes that respond to the exigencies of their situations and local realities in a bid to avoid state interference and repressions. The journalists in the West African countries could assume this agency by limiting the influence of external experts and government institutions.

Bertrand (2000) added that codes issued by governments or state institutions are "nothing but executive orders and cannot usually be considered as true codes" (p. 42). But he argued further for the participation of external experts whenever journalists attempt to write a code of ethics. Hamelink (2011) disagreed with this argument because the participation of media development agents, over the years, has resulted in a multiplicity of the same codes around the developing world. But more often than not, during the formulation of a code of ethics, these agents have rather imposed their values as best practices and standards. They have, therefore, failed to exhibit the gray lines that exist between developing and developed societies. What these codes have managed to achieve is to lay emphasis on objectivity and other vague concepts. El-Nawawy and Iskandar (2003) noted that one of the popular principles in journalism, which is also contained in the code of ethics, is objectivity, a principle that is contextual, problematic, and often misleading. Prinzing (2008, p. 109) cautioned journalists to stop "chasing for these unicorns (objectivity, truth, neutrality, and impartiality) and encourage themselves



to be more honest to their audiences." Journalists are expected, in the media accountability and transparency literature, to make normativity a rule in their statements by acknowledging that their reports are biased, not because they want them to be, but because representation by nature is biased. They could mention that alternative perspectives exist and proceed to explain to the public why they chose one angle over the other.

Traber (1997) reaffirmed the assumption that "Western communication ethics is shaped largely by individualist, and Asian and African ethics by communitarian or collectivist approaches" (p. 328). To better understand the background of the ethical breaches in Englishspeaking West Africa, this study explores how pronounced and clear the rules relating to these breaches are in the content of national journalistic codes of ethics and whether the similarities and differences in the wording of the codes are a results of the actors involved in the writing and adoption of these codes:

RQ1: Who were the authors of the codes?

RQ2: What do these codes have in common and how do they differ?

RQ3: Kadhi (1999) listed startling ethical challenges in English-speaking West Africa to include conflict of interest, bribery, intellectual theft, kowtowing to advertisers and politicians, use of dubious evidence, and outright bias. How pronounced and clear are the rules of the codes against these ethical breaches?

Method

The study employed the *pragmatic* approach to studying the intents of journalism codes as espoused by Nordenstreng (1995) and Hafez (2002). The pragmatic approach locates the codes in an interpretive discourse, within an interactive social system. That is to say that codes require a contextual interpretation that is either international or national (intracultural).

The approach is rooted in an interpretive perspective to analyzing the content of the codes. All the codes analyzed have useful participation from national journalist associations in their formulation and regulation through the receipt of complaints and the prescription of disciplinary actions where necessary. These represent the common basis for the analysis of the selected countries.

Following Altheide's (1996) qualitative content analysis strategy, the study focused on discovery and description, rather than mere quantification of the appearance of certain words. The process involved in the analysis was completely reflexive. The researcher first conducted two close readings of the codes for immersion and prolonged engagement with the text, after which a combined machine and human analysis was conducted.

The MAXQDA software was used for initial lexical search in line with some predetermined categories, based on the literature and the emerging categories from the data. For example, truth and objectivity remain fundamental principles to the wording of most codes around the world. The Boolean search provided the specific pages of the codes where a defined principle/theme could be located. The veracity of the annotation in MAXQDA is checked manually. A second close reading and pooling together aspects of the code that spoke about specific principles and rules were conducted.

It is possible within the MAXQDA software to search for six words (maximum) that might signify the availability of a thematic principle. The second close reading helped in the determination of the appropriateness of the rules to a particular thematic principle. A second coder then cross-checked the veracity of chosen rules by repeating this process randomly. It was simple to determine the agreement of the first and the second coders due to the fact that the code of ethics has a simple thematic space (operationally defined as rules/sentences of the code).



Results

Addressing RQ1, four groups of actors were deduced from the preambles of the codes: journalists associations only, journalists' and publishers' associations, journalists associations, and the state and press council.

The codes of ethics of Ghana, Liberia, and the Gambia were written and adopted by their respective national journalists associations solely, a situation that is considered in media accountability literature as most appropriate (see Eberwein et al., 2018). The Nigerian code, although written by the Nigerian Press Organisation, which includes the Nigerian Union of Journalists and The Guild of Editors and Newspaper Proprietors Association of Nigeria, remains largely the product of the Nigerian Press Council, which is statutorily mandated to approve and ensure compliance of the code. The chairperson of the Nigerian Press Council is appointed by the government in addition to a representative of the Federal Ministry of Information. Other members of the council include the four representatives of the general public, a representative of educational institutions, two representatives from the Broadcasting Organisation of Nigeria and one representative of the News Agency of Nigeria. Sierra Leone's code is an outcome of collaboration among Union of Journalists, the Independent Media Commission, and the Ministry of Information and Broadcasting. Laitila (1995), Hafez (2002), and Fielden (2012) have all argued that code of ethics are instruments for the journalists themselves, rather than press councils or the state, and, therefore, the involvement of government in formulation and implementation of the codes in Nigeria and Sierra Leone has so far demonstrated that the government is usually more powerful in calling the shots. The attempts in Nigeria to convert the ethics code into an act of parliament is an instance of this power imbalance.

From Table 1, it is clear that journalists are the most influential people in the writing and promulgation of their code of ethics except the cases of Nigeria and Sierra Leone, where the codes require external endorsement. But due to the overconcentration on repressive regimes within which African journalists work, the literature does not reflect the agency African journalists have actually exercised to self-regulate effectively. The analysis of the content of the codes provided an avenue to check how the journalists formulated their codes both in free and repressive regimes.

Addressing Q2, the similarities and dissimilarities in the codes of ethics were analyzed based on both deductive and inductive thematic principles. This section of the study pools together rules in the codes that relate to individual themes for discussion.

	Code of Ethics (National)	Journalists Only	Journalists and Publishers	Journalists and the State	Press Council
1	Ghana	X			
2	Nigeria				X
3	Sierra Leone			X	
4	Liberia	X			
5	The Gambia	X			

Table 2. Truth and objectivity in journalism codes (selections).

Country	Article
Gambia	"Objectivity demands that both sides and all points of view in a controversy shall be presented" (Principle 3).
Ghana	"The duty of every journalist is to write and report the truth, bearing in mind his/her duty to serve the public"
	(Article 1).
Liberia	"The journalists should make sure of what he/she reports is without distortions" (Article 2).
Nigeria	"The public has a right to know the truth" (Preamble, 2i).
Sierra	"All stories aired by radio stations must be presented with due accuracy, truth and impartiality" (Article 6 under
Leone	Radio/TV Rules).

Truth and objectivity

Hafez (2002), Laitila (1995), and Nordenstreng (1995) have all agreed that journalistic codes, all over the world, seek to establish the principles of truth and objectivity as their cornerstone.

The selected rules confirm the prevalence of this principle as argued in Hafez (2002). It is common in most of the codes that journalists are asked to strive to present the truth mainly because of the public's right to be properly informed. Objectivity could also mean being factually correct and unbiased in coverage. This principle is mentioned in all the five codes analyzed. For example, in the Gambia where criminal libel remained (during the regime of Jemeh) in the country's laws, it was not surprising that truthfulness, truth, and avoiding distortions never appeared anywhere in the code. Accuracy relating to the reportage on children was mentioned once. The Gambia had criminal libel in their laws during the dictatorship of Yayah Jemeh and in criminal libel regimes, truth is not useful for reporting about the state (Glanville & Heawood, 2009). The Gambian journalists ignored truth completely from their codes for reasons not stated. However, it is imperative to note that journalists in criminal libel regimes might have false hope when it comes to reporting truth about the state. Although what a journalist reports about the state could be true, that does not serve as a justification in court if the state deems the report as scandalizing the image of the country. Truthfulness is crucial in all reporting to avoid defamation and uphold the sanctity of journalistic principles and the public's confidence. The Gambian code ignored truth as a principle of journalism entirely.

The Nigerian code mentions truth and objectivity in the preamble but rather emphasizes a rule on accuracy. The tripartite press council of Nigeria, made up of several constituents, sees reality, truth, and objectivity as multifaceted principles and, therefore, are more comfortable with accuracy. Ghana, Liberia, and Sierra Leone have articles on truth and objectivity.

The principles of truth and objectivity touched on significant portions of Kadhi's (1999) concerns about the state of journalism in English-speaking West Africa. Even though truth and objectivity are prevalent in the codes analyzed, it is essential to note that objectivity, itself, is problematic to achieve. El-Nawawy and Iskandar (2003) called it "contextual objectivity," p.54) i.e., objectivity is never more than contextual. Objectivity and truth are sometimes misleading because of the fact that every onesided perspective of an issue in itself disinforms. Although Ghana and Nigeria have had stable democracies for a couple of decades and have clear rules on these principles, it is still possible to predict the line of analysis of senior journalists on most political issues. There are records of the refusal of senior journalists in Ghana to publish rejoinders and accept mistakes because they find a large following for the position they might have taken especially on political lines (personal communication, Y. Boadu-Ayeboafo, March 15, 2011). The firm claim to objectivity and truth in their codes have significant limitations in practice but, nonetheless, the journalists have not stopped chasing for the unicorns of objectivity and neutrality. Table 2 presents country details:

Privacy and publicness

Hafez (2002) analyzed selected codes from Europe, North Africa, the Middle East, and other Asian Islamic countries and identified privacy and publicness (public interest) as common principles that were quite pronounced to journalism codes from North Africa and the Middle East. Table 3 presents rules highlighting privacy and publicness.

This study also confirms that the five West African countries firmly agree when it comes to privacy but with the caveat of public interest. Privacy, private life, protection of the private sphere, and human dignity appear in all the codes. It is by far the most common principle to all the codes analyzed. However, it is not surprising that privacy is often invaded in these countries due to the caveat of public interest that is attached to this rule. Almost all the five codes stated that in the interest of the public, privacy can be invaded. This caveat becomes the basis for journalists to justify deception and outright biases, mostly for the interest of few influential people in society. It should also be noted that the Gambian version of privacy is further complicated because it provides



Table 3. Privacy and public interest in journalism codes (selections).

Country	Article/Sentence
The Gambia	Everyone is entitled to respect for his or her private and family life, and home; except in the case of public figures, no publication shall be justified based on intrusion into people's private life without their consent (Privacy-point 7).
Ghana	Journalists should respect the right of the individual, the privacy and human dignity. Enquiries and intrusions into a person's private life can only be justified when done in public interest (Article 5).
Liberia	The journalist should respect the private lives of persons when they have no consequence on public life. Journalists should ensure the respect of the rights or reputations of others. Enquiries and intrusions into an individual's life can only be justified when done in the public interest (Article 5).
Nigeria	As a general rule, a journalist should respect the privacy of individuals and their families unless it affects public interest (Privacy-introduction).
Sierra Leone	Everyone is entitled to respect for his or her private and family life, home, health, and correspondence. A publication will be expected to justify intrusions into any individual's private life without consent (Point 6 for Radio and TV).

protection for family and home, but said public figures have no such protections. Public figures do have privacy, especially when they do not engage in anything that has public interest, but this notion was ignored completely by the Gambian code.

Plagiarism and copyright

Kadhi (1999) mentioned intellectual theft as one of the major scandals in the English-speaking West African countries. Plagiarism and copyright featured significantly in most of the codes. In the case of Sierra Leone, the code even mentioned a fine for a breach. The Sierra Leone code can be seen as a law or regulation for journalists because it is part of an act of parliament and uses imperative language, which is all indicative of the evidence that government institutions, rather than journalists, were fundamental in the formulation of this code. Plagiarism is taken more seriously in French-speaking countries in West Africa than their English-speaking counterparts. The Ivorian press regulatory body, Conseil National de la Presse, suspended journalist Adama Coulibaly of the privately-owned newspaper Le sursaut for one year for committing a type of plagiarism, a move that should caution other journalists on the continent (Conseil National de la Presse, 2015). However, plagiarism can be discussed as an element of the journalistic concept of news borrowing where journalists rely significantly on each other's news to validate their angle. But ignoring the rules of attribution and sourcing, in most cases, could render stories plagiarised. Table 4 presents rules on plagiarism and copyright that were found in the codes.

The four other codes considered plagiarism as an ethical misdemeanour that journalists needed to avoid, but allowed the use of material from each other; the codes provided the manner in which it should be done.

Table 4. Plagiarism and copyright (selections).

Country	Article/Sentence
The Gambia	The journalist should not plagiarise because it is unethical and illegal. Where there is the need to use other people's materials it is proper to credit the source.
Ghana	A journalist should not plagiarise because it is unethical and illegal. Where there is the need to use another's material, it is proper to credit the source.
Liberia	The journalist should refrain from plagiarism, defamation, obscenity, slander, and unformed accusations. Where there is need to use other's material, it is proper to credit
Nigeria Sierra Leone	A journalist should not copy, wholesale, or in part, other people's work without attribution and/or consent. Any material culled from another publication must be acknowledged or credited or must have the permission of the original publisher. Failure to do so shall make the newspaper/magazine liable to a fine not exceeding Le500, 000.



Freedom of the press

Some journalistic codes around the world charge journalists to defend press freedom and ensure that free speech is upheld. The existence of this rule in a particular country's code does not reflect whether that country is enjoying the guarantees of free press, but nonetheless most journalists remind themselves in their code of ethics about the calling to uphold free speech. Ghana, Sierra Leone, and the Gambia do not mention anything in their codes about freedom of the press. Hafez (2002) explained that codes of ethics integrate the concept of freedom from three perspectives: First, freedom as a central value that can only be limited when it interferes with other fundamental human rights (e.g., codes in European countries); second, codes incorporating freedom as a central value that is, however, limited due to political, national, religious, or cultural considerations (e.g., Egypt and Algeria); third, codes that do not mention freedom at all (e.g., Saudi Arabia). Ghana is part of the category of countries whose codes of ethics do not mention the defence of press freedom, because the 1992 Republican Constitution of Ghana makes a strong provisions for the protection and functioning of media in Chapter 162 and charges the National Media Commission to ensure that the constitutional provisions for free speech are upheld. The Independent Media Commission (IMC) of Sierra Leone, which derives its power from the IMC Act, has as one of its objectives the duty to uphold free speech and responsibility. These could account for the omissions in Ghana and Sierra Leone codes. The Gambian code's omission can't be explained because free speech was not so guaranteed at the time, yet their code did not mention the defence of freedom of speech and free press. Table 5 shows these in detail.

The Gambian code is the work of journalists and, therefore, the absence of freedom of the press can only be considered as an omission. Journalists in repressive regimes rather tend to remind themselves of the need to protect and improve press freedom. The Nigerian code, for example, sees press freedom as a core value that comes with responsibility or restraints. The Liberian code provides for freedom of the press without necessarily attaching it to any restraints or caveat.

National unity and ethnic values

The selected West African countries in this study are fairly young nation states with varied ethnic groups and religions. One would expect that the codes could provide some strong position on the protection of traditional ethnic values and culture (see the works of Kasoma, 2000; Moemeka, 1998; Okigbo, 1989). Surprisingly, the West African codes did not have such rules, contrary to the findings of Hafez (2002) that codes in Islamic countries point to different loyalties, including "state security and stability, the protection of caste over Arabism and demand of religious loyalty from journalists compared to their European counterparts" (p. 244). According to Traber (1997), collectivist or communitarian communication ethics applies significantly to the cultures of African countries. However, the commitments in the West African codes regarding collectivism was almost nonexistent. The codes of Sierra Leone and Ghana are the only ones that provide a rule where the journalists are required to respect the ethnic variety and promote national culture.

Nigeria, Liberia, and the Gambia have no rules in their codes regarding the defence of traditional and ethnic values and culture. Liberia, for instance, continues to recover from civil war, and one would have

Table 5. Freedom of the press (selections).

rable of freedom of the press (selections).		
Country	Article/Sentence	
The Gambia		
Ghana	-	
Liberia	The journalists shall defend freedom of speech, expression and information.	
Nigeria	A journalist should strive at all times to enhance press freedom and responsibility.	
Sierra Leone	- · · · · · · · · · · · · · · · · · · ·	



Table 6. Defence of traditional and ethnic values (selections).

Country	Article/Sentence
The Gambia	-
Ghana	 A journalist should not originate material, which encourages discrimination on the grounds of ethnicity, color, creed, gender, or sexual orientation.
Liberia	
Nigeria	-
Sierra Leone	Radio and TV stations shall endeavour to promote Sierra Leonean culture and the arts as a means of sustaining national cohesion and unity in diversity.

expected the mention of national cohesion, the defence of Liberian culture and respect for ethnic diversity as part of its code. Table 6 presents an article from Ghana and Sierra Leone codes.

Many of the West African countries have several tribes and ethnic value systems, and the journalists who grew up in these countries have a good idea of the crucial role these play in everyday life. The blatant omission of common ethnic values represents the influence of Western international donor organizations that have little understanding of the African culture (Hamelink, 2011) but remain important actors that fund and consult in the formulation of most of these codes. They find the diversity of ethnic groups as a complication that should not be listed in the ethics code. However, whether listed or not, the journalists are normatively inclined to respect ethnic and traditional values.

Discussion

The composition of the actors in the writing of the codes indicates that the code of ethics represents an instrument for journalists because three out of the five codes were written by journalists with expert advice. What remains unclear is whether the influence exerted by funding organizations and consultants from Europe and North America in writing the content of the codes is appropriate. Christians and Traber (1997) posited that African ethics is shaped by communitarian approaches, a position that is not shown in the wording of the journalistic codes analyzed. Apart from Sierra Leone and Ghana, none of the West African countries mentioned the protection of traditional, ethnic diversity and religious values of their citizens. Ignoring such important aspects of their society reveals the extent to which the journalism education in these countries remain inspired by Western ideologies and media practice. This study argues, just as Hamelink (2011) did, that the influence of international donor organisations on the content of the codes in these developing countries can be judged from the omissions of principles and rules relating to African communitarianism and close similarities of the codes to those in Europe. Although the focus of this of this study is not to establish the degree of influences European funding agencies have on the content of the West African codes, the similarities shared by these codes with their European counterparts is telling. In addition, the preambles of some of the codes state clearly where the source of funding and technical support is coming from. The president of the GJA in a recent radio interview on Starr FM in Ghana (May 27, 2015) admitted that the association is waiting for final evaluation and funding from Friedrich Ebert Foundation (initial donors from Germany) to launch its repackaged code of ethics. These incidents, according to Hamelink, form the basis of why most codes of ethics in developing countries fail to adequately tackle ethical breaches. In effect, these codes are a reproduction of those from selected European and North American with no context and appreciation of the unique conditions and value systems in these developing countries.

Again, Hafez (2002) contended that western individual versus eastern communitarian journalism ethics exists, but clearly, codes analyzed in this study are within the Western framework, contrary to the assumption of Traber (1997) and Hafez (2002) that developing countries are mostly located in the latter. In developing a code of ethics in Africa, the continent's years of engagement in trade,

education, continued funding, and technical assistance from the developed world has resulted in virtually a reproduction of these global codes with little or no changes. This is contrary to the case of the Arab codes recounted in the findings of Hafez (2002). Considering the appropriation of African traditional narratives in Ghanaian journalism alluded to in Hasty (2005), it is unclear why this does not reflect on the content of the Ghanaian journalistic codes.

The similarities in the codes of Sierra Leone and Nigeria are a result of the similarities in the composition of the actors and the process of formulating these codes. The Sierra Leone IMC is a state institution that draws its power from the Independent Media Commission Act. The state and journalists jointly established the Nigerian Press Council. Both Sierra Leone and Nigeria had many constituents of membership in the adoption of the code of ethics. But Ghana and Liberia, whose codes were written and adopted entirely by journalists, have similar rules and principles. The Gambian code is closer to the Ghanaian and Liberian codes because journalists adopted it solely. Irrespective of the existence of the criminal libel regime in the Gambian laws, the journalists' union responded to its call to serve society by formulating a code that looks quite similar to that of Ghana, where criminal libel was repealed in 2001 and constitutional provisions insulate the media from government control. The few differences that exist among the codes related to the themes of *national* unity and ethnic values and privacy and publicness. These differences relate to either an omission or further detail. This is consistent with the notion held by Hamelink (2011), Bertrand (2000), and Hafez (2002) that journalism codes are quite similar worldwide.

Many of the ethical breaches mentioned in the literature (see Blay-Amihere & Alabi, 1996; Kadhi, 1999; Kasoma, 2000; Nymmnjoh, 1999) fall within issues of truth, accuracy, objectivity, fairness, and plagiarism. Articles relating to these principles were clear in the codes of ethics analyzed. It should be noted that this study did not set out to explain whether ethical principles stated in codes have the capacity to change journalistic professional behaviour. For that matter, it was not within this study's scope to explain whether or not truth and objectivity, for instance, were achievable. However, journalists in English-speaking West Africa have adequate rules in their respective codes to deal with these breaches. Regarding the ethical breach of kowtowing to advertisers and politicians, the study argues that the codes are silent on how journalists ought to deal with this. For instance, journalistic codes have no power to stop journalists from kowtowing to politicians if the media system in that country allows politicians as owners. The case of weak enforcement of the code of ethics across the continent of Africa (Blay-Amihere & Alabi, 1996, FES, & AWC, 2005, Ifeduba, 2014) by press councils, journalism associations, and state institutions has put the effectiveness of journalistic self-regulation into real jeopardy.

As explained earlier, this research opens up the debate about the effectiveness of codes of ethics to change journalistic behavior. In this study, the focus was on the wording of the codes, but future research could investigate how interpretational differences, professional orientations, and media systems influence the effectiveness of the codes of ethics from the perspective of journalists and experts.

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ORCID

Dr. phil. Michael Yao Wodui Serwornoo (b) http://orcid.org/0000-0001-8975-4607

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