Policies in Parallel? A Comparative Study of Journalistic AI Policies in 52 Global News Organisations

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Kim Björn Becker[1†], Felix M. Simon[2†], and Christopher Crum[3‡]

[1]Frankfurter Allgemeine Zeitung, Frankfurt, Germany & Trier University, Trier, Germany, becker@uni-trier.de
[2]Oxford Internet Institute, University of Oxford, Oxford, United Kingdom, felix.simon@oii.ox.ac.uk
[3]Oxford Internet Institute, University of Oxford, Oxford, United Kingdom

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Abstract

A growing number of news organisations have set up specific guidelines to govern how they use artificial intelligence (AI). This article analyses a set of 52 guidelines from publishers in Belgium, Brazil, Canada, Finland, Germany, India, the Netherlands, Norway, Sweden, Switzerland, the United Kingdom, and the United States. Looking at both formal and thematic characteristics, we provide comparative insights into how news outlets address both expectations and concerns when it comes to using AI in the news. Drawing from neo-institutional theory and the concept of institutional isomorphism, we argue that the policies show signs of homogeneity, likely explained by isomorphic dynamics which arose as a response to the uncertainty created by the rise of generative AI after the release of ChatGPT in November 2022. Our study shows that publishers have already begun to converge in their guidelines on key points such as transparency and human supervision when dealing with AI-generated content. However, we argue that national and organisational idiosyncrasies continue to matter in shaping publishers' practices, with both accounting for some of the variation seen in the data. We conclude by pointing out blind spots around technological dependency, sustainable AI, and inequalities in current AI guidelines and providing directions for further research.

Keywords: Artificial Intelligence, LLMs, News, Journalism, Isomorphism, AI Guidelines, AI Ethics, Comparative Analysis

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†Both authors contributed equally to the design, data collection, analysis, and writing of the study.
‡Christopher Crum contributed to the coding and analysis of guidelines, designed, and carried out the syntactical analysis, and contributed to the final write-up.

Introduction

Artificial intelligence (AI) is increasingly being adopted in the news industry. The public release of ChatGPT, a so-called Large Language Model (LLM), in November 2022 by US start-up OpenAI has accelerated this trend, with news organisations looking to the technology with both high expectations and concerns. AI, and especially LLMs with the functionality to create realistic, multi-modal content ranging from text to visuals are seen as technologies with the potential to fundamentally change the way people interact with news, how news organisations produce and distribute content, as well the broader information environment and news organisations' business models (Arguedas & Simon, 2023; Simon & Isaza-Ibarra, 2023). At the same time, concerns about abuse and safety of AI applications, copyright, accuracy of output, and privacy – to name just a few – abound.

While it is too early to say if and how these expectations will ultimately be borne out by reality, many news organisations – some of which had already started to adopt AI in the past (Diakopoulos, 2019; Beckett, 2019) – have started to experiment with generative AI. According to a non-representative survey by industry body WAN-IFRA, many organisations experiment with LLMs for tasks such as summaries, illustrations, copy-editing or generally improving workflows, among other things (WAN-IFRA, 2023, p. 5). These uses are in line with earlier uses of other forms of AI in news organisations which are ongoing.

Yet, many of these carry risks. Recommendation engines can discriminate against certain groups of users. Texts produced by LLMs are prone to factual errors and distortions while AI-generated images may be mistaken as real by audiences. If newsrooms decide to publish AI output without taking precautions, they may be putting their journalistic credibility at risk. At the same time, the rise of digital media more generally has also brought new actors into news production and distribution, including technology vendors and platform companies, with activities once viewed as inherently journalistic 'increasingly distributed across a range of actors', putting the professional ethics of journalism on shakier ground (Parasie, 2022, p. 13). This is also true for the case of AI, with publishers concerned about e.g., the privacy of their data and the viability of their business models as news content is used to train AI models – often without publishers' permission.

In response, news organisations have started to draw up AI guidelines as one way of countering some of these issues and regarding the use of AI and to ensure the ethical use of AI. For example, press councils and associations in Germany, Belgium and Spain have proposed ground rules for AI in journalism (see Deutscher Journalisten-Verband, 2023; Raad voor de Journalistiek, n.d.; Ventura Pocino, 2021). However, as the possible uses of AI may vary from publisher to publisher, general position papers can only provide some guidance and are unlikely to meet individual needs. Various publishers have therefore decided to create more specific sets of rules (see, e.g., WAN-IFRA, 2023, p. 9), which in turn have attracted the interest of scholars.

Yet, despite some pioneering work studying the content of such guidelines, questions about these inhouse guidelines remain. Amid calls to regulate AI more tightly, including in the news,[1] how advanced are current efforts? Where do efforts converge or diverge and what are the blind spots? Given that AI's shaping power acts broadly in the same way across contexts, one could expect that publishers' reactions to these effects would show at least some uniformity, too. However, how and where AI guidelines converge or diverge from each other – both in terms of what they look like (formal characteristics) and what they say and do not say (thematic characteristics) remains an open question. Our paper addresses this gap. We examine a total of 52 journalistic AI policies from publishers in ten countries in Western Europe, Scandinavia, and North America as well as Brazil and India. We argue that AI guidelines show patterns of isomorphism, suggesting that publishers across national media systems and organisational categories respond to the rise of AI in broadly similar ways. However, there are indications that national idiosyncrasies and organisational categories continue to matter as important moderating factors. Funding models, in particular, seem to lead to different priorities, with commercial publishers often more detailed and with a stronger focus on allowed and prohibited uses as well as data protection. Finally, our study shows that AI guidelines still exhibit some blind spots – especially around questions of sustainable AI, technological dependencies an AI inequalities and human rights – leaving important aspects concerning the use of AI unmentioned, and thus under-regulated.

We first provide an overview of the literature, starting with a summary of the role of ethics in journalism and the development of industry self-regulation through editorial and social media guidelines. Second, we explain institutional isomorphism which we use as a framework to motivate our research questions and explain our findings. Third, we explain our sampling strategy, data collection and analysis before presenting and discussing findings. We conclude with suggestions for further research.

Literature Review

Ethical issues can arise at every juncture of the journalistic process. While professional ethics is intimately linked to the quality of journalistic products, these concepts are not identical. Sometimes, measures aimed at enhancing the quality of journalism are not necessarily based on ethical behaviour, and sometimes quality and journalistic ethics might even be at odds, as seen with the speed of reporting (Meier, 2018, p. 250). Today professional ethics mainly pertains to issues related to the accuracy and verification of information, the independence of journalists and publishers, possible deception and fabrication of facts in the production of content, the use of graphic images and image manipulation, and the handling of sources and confidentiality (Ward, 2009, pp. 296-297).

[1] https://rsf.org/en/collaboration-its-partners-reporters-without-borders-rsf-launches-international-committee-ai

Self-Regulation of the News Through Guidelines

Below the formal level of laws and regulations, which generally define what journalism can and cannot do (Ruß-Mohl & Schultz, 2023: pp. 267-281ff.), the journalistic profession relies on self-regulation. This is particularly true in liberal democracies, wherein press freedoms curb potential government efforts to influence reporting. Self-regulation rests on two pillars. First, many news organisations regulate themselves by setting up non-governmental press councils, who often issue broad guidelines which in turn shape the work of participating organisations. A study of 55 press council codes of ethics across 45 countries (European Commission, n.d.) found that these stress 'core journalistic ethical principles' such as fairness and accuracy in reporting, as well as autonomy of the press but are often very general in their remit. Second, publishers often develop individual guidelines. An editorial guideline constitutes a set of rules by a specific organisation that media professionals must or should observe. Such internal guidelines often show great variety, encompassing various documents, from formal regulations to informal memos (Duffy & Knight, 2018, p. 7). Large publishers' own guidelines are often more specific than those of press councils and reflect the principal values and standards of the respective publisher (Schultz, 2021, p. 126). Usually, these are intended to further specify the rules for these organisations' journalists and staff.

News Organisations' Social and New Media Guidelines as Precursors

In recent years, publishers have formulated additional guidelines for specific topics, for example the use of social media. Various studies have looked at these, e.g., through interviews or content analysis (Opgenhaffen & Scheerlinck, 2014; Bloom, Cleary & North, 2016; Adornato & Lysak, 2017; Sacco & Bossio, 2016; Ihlebaek & Larsson, 2018; Opgenhaffen & d'Haenens, 2015; Lee, 2016; Duffy & Knight, 2018). Many of these focused on English-speaking countries (Lee, 2016) due to shared ideological and economic structures and similar media systems (Duffy & Knight, 2018, p. 7), with Opgenhaffen/d'Haenens (2015), additionally focusing on Belgium and France.

Research on social media policies has largely been limited to mapping how specific media companies understand social media and what kind of behaviour they require of their journalists on these platforms. The modest sample sizes and focus on the Anglosphere make broad conclusions difficult. However, the results showed 'no homogeneity' (Opgenhaffen & d'Haenens, 2015, p. 213) as well as 'ambivalence' (Duffy & Knight, 2018, p. 8) which is notable given that social media are somewhat similar in their affordances across countries. In their study of ethics guidelines for immersive journalism of eight publishers in English and Spanish-speaking countries, Sánchez Laws & Utne (2019) mainly found differences by organisation type, with 'a stricter ethical regime [...] in publicly funded broadcasters' (p. 5) compared to privately owned media. Finally, contrasting professional journalism ethics with social media guidelines, Lee (2016) found that the latter 'hardly reflect changing journalistic norms' (p. 121).

Policies for the Use of AI in News Organisations

Early research on news organisations' AI guidelines has also been largely descriptive. Becker (2023) examined a total of seven guidelines from Europe and North America, while Cools & Diakopoulos (2023) analysed 21 guidelines, 14 from Europe, five from North America and one each from Asia and South America. Both studies looked at the formal level, examining how the documents were titled and what statements were made about their binding nature. In addition, they addressed why media companies want to use AI, what applications should be allowed and prohibited, how to deal with human oversight of AI-produced material and transparency, principles of responsible AI, and possible dynamisation of the guidelines. Becker (2023, pp. 145-146) furthermore refers to internal and external collaboration, while Cools & Diakopoulos (2023) focus on accountability and responsibility, training, and the concept of cautious experimentation.

Given the small sample sizes, possible patterns are cursory. For example, Cools & Diakopoulos (2023) point out that two media outlets owned by the same company tend to have similar policies. Becker (2023, p. 147) noted links between the journalistic style of the organisation and the form chosen for the guidelines: 'The news agencies present their guidelines briefly in a news-like style, while magazine[s] chose a more narrative form, and a British broadcaster known for its structural complexity chose the form of detailed guidelines'. In addition, the goals for the use of AI in the newsroom, as stated in the guidelines, tended to vary between media organisations. The AI policies of private sector news organisations seemed to associate AI with comparative business advantages, such as speed and breadth of coverage, while public service broadcasters focused more on public service implications (Becker 2023, p. 139).

Theoretical Framework

Neo-Institutionalism and Institutional Isomorphism: How News Organisations deal with Uncertainty

It is worth noting that journalism ethics were 'developed for a journalism of limited reach, whose public duties were assumed to stop at the border' with the search for a global journalism ethic still 'a work in progress' (Ward, 2009, pp. 304-305). While both national differences and organisational differences continue to matter in the news and play a role in shaping publishers' and journalists' practices, including around the adoption of new technologies (Hanitzsch & Mellado, 2011; Perusko et al., 2020), the news industry, or its organisations, are also increasingly shaped by factors that transcend nationally bounded media systems, for instance the growing influence of the technology sector, or they themselves transcend nationally bounded media systems because they operate in more than one national market. AI as a technology also acts with broadly similar effects across contexts, so it would be reasonable to assume that outlets across context react to the technology – and its concomitant challenges – in similar ways.

To explain possible similarities – a homogenisation – and patterns in AI guidelines on a larger scale, we work with a neo-institutional lens, in particular the concept of institutional isomorphism, the 'tendency of organisations in a particular field to resemble one another,' especially when faced with constraints (DiMaggio & Powell, 1983). Isomorphism can be the result of one or a combination of three possible factors: coercive, mimetic, and normative.

Coercive isomorphism 'results from both formal and informal pressures exerted on organisations by other organisations on which they depend and by cultural expectations in the society in which organisations operate' (DiMaggio & Powell, 1983, p. 150). Pressures can include laws and regulations or industry standards. *Mimetic* isomorphism refers to an organisation's response to uncertainty which often encourages organisations to respond to a stimulus by modelling themselves on similar or more successful organisations in their field. This may be particularly true when 'technologies are poorly understood [...], when goals are ambiguous, or when the environment creates symbolic uncertainty' (DiMaggio & Powell, 1983, p. 151). Finally, *normative* isomorphism is the result of pressure from professional groups, i.e., it 'stems primarily from professionalisation,' what DiMaggio & Powell describe as 'the collective struggle of members of a profession to define the conditions and methods of their work' (1983, p. 152). Factors leading to normative isomorphism include inter-organisational networks of exchange or the movement of labour between firms.

In the news industry, there is ample evidence that isomorphic processes in the past have occurred as result of all three of these factors. Looking at the pivot to online video news, Kalogeropoulos & Nielsen (2018) found that a mixture of audience demand (coercive), commercial considerations (mimetic), uncertainty about platform businesses' interests and strategies, and uncertainty about the future direction of digital media (coercive, mimetic, normative) led the majority of organisations in their study to 'converge on a similar short, platform and mobile-oriented approach to online news video' with differences 'more clearly related to organisational differences than to country differences' (p. 2221ff.). Christin (2020) and later Petre (2021) also demonstrated forms of mimetic isomorphism in the use of audience metrics. Faced with uncertainty and constraints, publishers across organisation types (Petre) and countries (Christin) adopted audience metrics in broadly similar ways, even though some differences remain due to national and organisational idiosyncrasies. Finally, Simon (2023a) finds that the adoption of platform companies' AI and AI infrastructures follows an isomorphic pattern, with uncertainty about the direction and effects of the technology and the fear of being left behind acting as strong motivators for forms of mimetic isomorphism, recurring movement of talent and the highly networked nature between these news organisations contributing to these forms of normative and mimetic isomorphism, and AI as a large technological system (Simon, 2023a) itself acting as coercive force.

Considering the current uncertainty about what AI is, what it can and cannot do for and to the news (Newman, 2023; Simon, 2023b; Simon & Isaza-Ibarra, 2023), isomorphism can serve as a useful theoretical framework to investigate the adoption and content of news organisations' AI guidelines. Our focus is therefore on examining the following research questions:

> **RQ0:** *To what extent do international news organisations' AI guidelines exhibit isomorphic tendencies?*

It will be readily apparent, however, that this question is too general and hides several more specific ones, as follows:

> **RQ1**: What are the formal and thematic characteristics of news organisations' AI guidelines?
>
> **RQ2**$_{\text{a}}$: How do AI guidelines compare across organisational types (commercial vs public service)?
>
> **RQ2**$_{\text{b}}$: How do AI guidelines compare across different countries?
>
> **RQ3:** What are the blind spots of current AI guidelines in news organisations?

Case Selection, Data, and Methods

To explore these questions, this study draws on a sample of 52 editorial AI policies from media companies and organisations in twelve countries, representing both the global North and South.

Sampling of Cases

Recent studies of social media and AI guidelines have been limited by small sample sizes and convenience sampling approaches, relying mainly on guidelines available online. To create a dataset with some meaningful variation that allows for a more general analysis, we took a more systematic approach. First, we identified a set of twelve countries falling into different media system categories (Hallin, 2016) where the existence of AI guidelines was already known or likely to be expected. These countries can be grouped into four main geographical regions: Western Europe (Belgium, Germany, the Netherlands, Switzerland, and the United Kingdom), Scandinavia (Finland, Norway, and Sweden), North America (Canada and the United States), and the Global South[2] (Brazil and India).

[2] We acknowledge that the concept of 'Global South' is fraught, especially as it is an exceptionally broad and heterogeneous category.

We then identified up to six leading companies or organisations for each country based on weekly use according to the Digital News Report (Newman et al. 2023) in each of the following categories: magazine, media group, news agency, legacy newspaper, online news/digital-born, private broadcaster, professional organisation, and public broadcaster. Because national media markets differ significantly from country to country, the sample is not entirely symmetrical. To avoid missing out on important outlets not captured by the overall sampling, we strategically incorporated additional outlets based on recommendations from country experts. The final sample included 207 media outlets which we contacted by email.

Of the 207 organisations, we were ultimately able to include 52 AI policies in our study. Seven media companies indicated that their policies were still under development, ten organisations had policies in place but would not share them for academic purposes, and a further eleven companies responded that they had no AI policies. We received no response from 127 contacted media organisations. In the final sample, a total of 33 documents (63.46%) were found online, in eight cases the companies made their policies available to us (15.38%), and in a further eleven cases we were able to obtain the documents from other sources (21.15%). 21 guidelines were available in English (40.38%), while the remaining 31 documents (59.62%) were translated to English using the neural machine translation service DeepL. Where possible, we verified the accuracy of translations drawing from our own experience (with German, Dutch and French) or with the help of native speakers.

Table 1: Study sample, sorted by country and organisation type

Nr.	Name	Country	Organisation type	Source
1	Mediahuis	Belgium	Media group	Online
2	Raad voor de Journalistiek	Belgium	Professional organisation	Online
3	RTBF	Belgium	Public broadcaster	Obtained
4	Nucleo	Brazil	Digital-born media	Online
5	The Globe and Mail	Canada	Legacy newspaper	Online
6	CBC	Canada	Public broadcaster	Online
7	Helsingin Sanomat	Finland	Legacy newspaper	Obtained
8	Suomen Tietotoimisto	Finland	News agency	Obtained
9	Council for Mass Media	Finland	Professional organisation	Online
10	Yle	Finland	Public broadcaster	Obtained
11	T-Online	Germany	Digital-born media	Online
12	Web.de/GMX/1&1	Germany	Digital-born media	Online
13	Frankfurter Allgemeine Zeitung	Germany	Legacy newspaper	Online
14	Rheinische Post	Germany	Legacy newspaper	Provided
15	Süddeutsche Zeitung	Germany	Legacy newspaper	Online
16	Handelsblatt	Germany	Legacy newspaper	Obtained
17	Der Spiegel	Germany	Magazine	Online
18	Ippen	Germany	Media group	Provided

19	Deutsche Presse-Agentur	Germany	News agency	Online
20	Deutscher Journalisten-Verband	Germany	Professional organisation	Online
21	Bayerischer Rundfunk	Germany	Public broadcaster	Online
22	The Quint	India	Digital-born media	Obtained
23	De Volkskrant	Netherlands	Legacy newspaper	Online
24	DPG Media	Netherlands	Media group	Obtained
25	ANP	Netherlands	News agency	Obtained
26	NPO	Netherlands	Public broadcaster	Provided
27	TV2	Norway	Commercial broadcaster	Obtained
28	Dagens Naeringsliv	Norway	Legacy newspaper	Online
29	Schibsted	Norway	Media group	Online
30	NRK	Norway	Public broadcaster	Provided
31	Sveriges Television	Sweden	Commercial broadcaster	Obtained
32	Svenska Dagbladet	Sweden	Legacy newspaper	Online
33	Aftonbladet	Sweden	Legacy newspaper	Online
34	Dagens Nyheter	Sweden	Legacy Newspaper	Provided
35	Journalisten	Sweden	Legacy newspaper	Online
36	Bonnier	Sweden	Media group	Provided
37	TT Nyhetsbyran	Sweden	News agency	Obtained
38	Heidi News	Switzerland	Digital-born media	Online
39	Tamedia	Switzerland	Media group	Online
40	Ringier	Switzerland	Media group	Online
41	SRF	Switzerland	Public broadcaster	Online
42	ITN	United Kingdom	Commercial broadcaster	Provided
43	Financial Times	United Kingdom	Legacy newspaper	Online
44	Reuters	United Kingdom	News agency	Online
45	BBC	United Kingdom	Public broadcaster	Online
46	Business Insider	United States	Digital-born media	Online
47	USA Today	United States	Legacy newspaper	Online
48	The Atlantic	United States	Magazine	Online
49	Wired	United States	Magazine	Online
50	AP	United States	News agency	Provided
51	RTDNA	United States	Professional organisation	Online
52	National Public Radio	United States	Public broadcaster	Online

Qualitative Coding, Quantitative Coding, Quantitative Syntactic Analysis

To analyse the AI guidelines included in our study we use a mixed methods approach combining qualitative thematic content analysis, quantitative coding, and quantitative syntactic analysis.

Qualitative and Quantitative Coding

Drawing from the literature on AI in the news as well as previous research on news organisations' general, social media, and AI guidelines (Becker, 2023; Opgenhaffen & d'Haenens, 2015, p. 206) as well as a first round of inductive coding using open, axial, and selective coding, we developed a codebook spanning 50 categories (see Appendix, Tables 1 and 2).

This was followed by a first round of deductive qualitative coding, where three coders coded all guidelines for 15 selected formal and thematic characteristics, with the unit of analysis being each individual sentence. Formal characteristics included the professional roles and specific AI engines mentioned. Thematic aspects were goals of AI deployment, journalistic values mentioned, allowed and prohibited AI applications, possible pitfalls of journalistic AI use, applications where transparency is required, possible elements of algorithmic bias, aspects of source protection, professional roles and institutions involved in internal and external cooperation around AI, and views on possible dependencies on large AI platform companies. Additionally, we analysed the documents through rigorous quantitative coding, focusing on 35 additional formal and thematic categories including allowed deployments of AI in the journalistic process, areas of human supervision, and methods of creating transparency when AI was used. The unit of analysis was the whole document. Each document was coded into all the categories. For the quantitative coding, the codebook was tested and refined over two initial rounds of test coding, whereby three coders independently coded a random selection of three guidelines in both rounds to resolve difficulties and misunderstandings. After each round, the results were compared and discussed, and the codebook refined. Once the codebook was set, two coders independently recoded all 52 pieces of content. To measure intercoder reliability, we used Krippendorf's Alpha as the most rigorous and reliable measurement. The reliability of each guideline's coding was estimated based on 3640 (1820 x 2) independent decisions in the coding process. In 68 cases the coders disagreed. Krippendorff suggests that it 'is customary to require $\alpha \geq .800$. Where tentative conclusions are still acceptable, $\alpha \geq .667$ is the lowest conceivable limit (2004, p. 241).' Krippendorff's Alpha was .94 on average with a range of .73 and 1. Remaining differences in coding were discussed and resolved.

Text-to-Text Statistical Comparison by Cosine Distance

In a final step, we conducted a quantitative, statistical comparison of each AI guideline to each other AI guideline to account for any residual blind spots in the manual coding. This analysis of syntactic similarity looked at the degree of resemblance in the arrangement and structure of five-word blocks and quantifies how closely two or more sentences align in terms of their words, grammatical patterns, and word order. The text-to-text comparison involved a three-step process for each dyad in the dataset: (1) cleaning translated-to-English PDF documents, (2) vectorising text, and (3) comparing the vectors by Cosine Distance. Since possible inferences from data are sensitive to pre-processing choices (Denny & Spirling, 2018, p. 4), only those aspects of text data that were irrelevant to the research questions were excluded at the cleaning stage. These included numbers, Unicode punctuation, and English-language stop words ('the',

'which', 'on', 'at' etc.). Finally, each text file was transformed to lower case and white space was stripped.

Following Spirling (2012) and Alschner & Skougarevskiy (2016, p. 11), texts were vectorised as the set of distinct five-word ("5-gram") sequences present in each text. 5-gram sequences were employed because they tend to be long enough to capture meaningful passages of text while short enough to be reoccurring across multiple guidelines if textual borrowing occurs. Cosine Distance, a measure of textual similarity well-suited to texts of varying lengths – a ubiquitous phenomenon in our dataset – was then computed.

The Cosine Distance between vectors ranges from 0, entirely the same set of n-grams, to 1, indicating no shared n-grams, and is specified by 1 minus the Euclidean dot product of vector A, where A is the term frequency vectorization of the first text, and vector B, where B is the term frequency vectorization of the second text, over the magnitude of each vector. The intuition behind Cosine Distance is that the more similar the two vectors are, the smaller the angle between them will be, and thus the larger the Cosine Distance. Results were arrayed in a symmetrical matrix and visualized as a heatmap (see Fig. 1 & 2), with darker colours indicating smaller distances, and thus, higher degrees of similarity.

To contextualise resulting values, a sample of general editorial guidelines (n=10) with an intentional overrepresentation of German-language guidelines (see Appendix, Table 3) to reflect the linguistic variation in the overall dataset, was also compared using Cosine Distances. Such an approach allows this paper to draw broad-strokes conclusions about how similar journalistic AI Guidelines are to each other in comparison to how similar general editorial guidelines are to each other. Thus, preliminary findings regarding the degree of convergence driven by the sharing of ideas in an environment of uncertainty surrounding AI can be assessed relative to convergence in established journalistic practices.

Findings

We first present findings from the syntactic, statistical comparison before presenting findings from the qualitative and quantitative coding of the formal and thematic characteristics of the AI guidelines. Due to the small sample size, we are constrained to descriptive statistics for the quantitative coding, as attempting more complex analyses or inferential procedures could lead to unreliable or misleading results.

Syntactic Similarity

The concept of syntactic similarity aids in assessing the likeness of sentences or text based on their syntactic composition. The matrix results of comparison by Cosine Distance in the AI guidelines sample indicates, on average, a lower degree of similarity than do results in the benchmark general editorial guidelines sample. One can see from the histogram in Figure 1 that the modal outcome of dyadic comparison in editorial

guidelines is between 0.4 and 0.6 while in Figure 2 (AI guidelines) the modal outcome is above 0.6. Visually, this is reflected in the presence of more tiles toward the red end of the spectrum indicating lower degrees of distance or a higher degree of statistical similarity on Figure 1 than on Figure 2.

Figure 1: Dyadic benchmark comparison of editorial guidelines by Cosine Distance

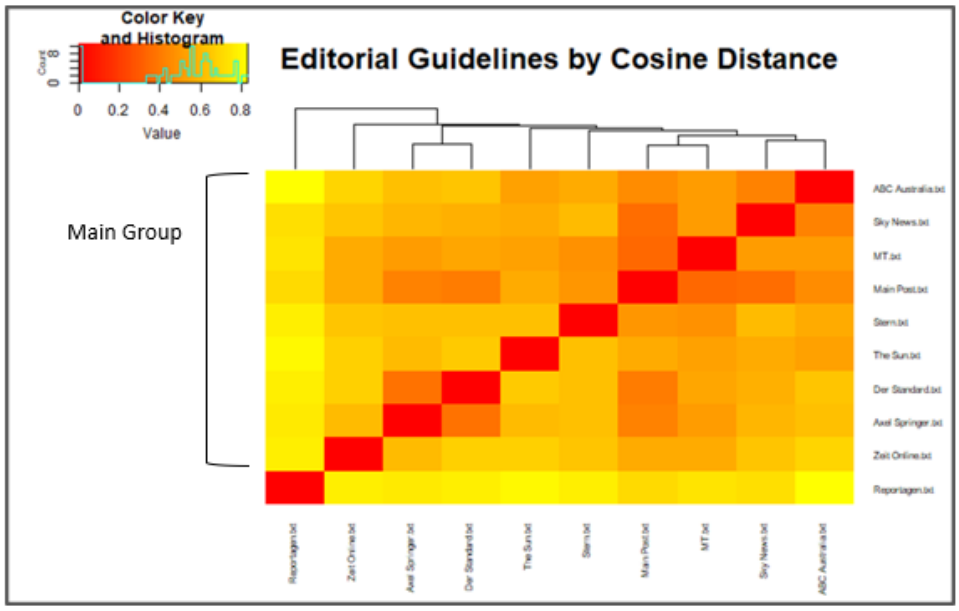


Figure 2: Dyadic comparison of AI guidelines by Cosine Distance

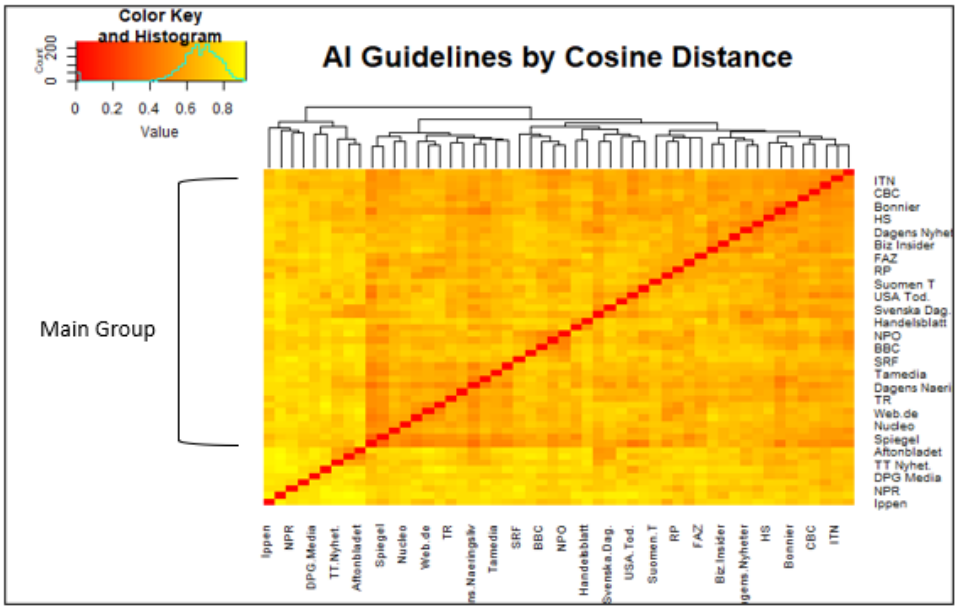


Figure 1: Due to space limitations, not all outlets are labelled.

One can observe clustering at the level of shared language in both samples. For example, the two most similar editorial guidelines in the benchmark sample, those of Sky News and the Australian Broadcasting Corporation, share English as a common language. Likewise, ITN and the Canadian Broadcasting Company (CBC), the two most similar AI guidelines in the study sample, also share English as a common

language. In broad strokes, the columnar dendrogram in both Figure 1 and Figure 2 indicates hierarchical grouping along language lines. Illustratively, Der Standard and Axel Springer, both German-language editorial guidelines, form a visually distinct block in Figure 1 (bottom-left quadrant), while Aftonbladet and TT Nyhetsbyrån, both Swedish-language AI guidelines, form an outlier block (bottom-left) in Figure 2.

At a broader level, the columnar dendrograms indicate a high-level in-group/out-group dynamic where many media organisations group together regardless of language boundaries while some media organisations chart their own path outside of the main group (labelled on both figures), leaving the average Cosine Distance within the group higher than in the out-group. The outlier group in Figure 1 appears to be an outlier group of one, suggesting that there are fewer media organisations willing to chart their own path in editorial guidelines than there are in AI guidelines, though that may be a sample size driven outcome. As one might expect, large, influential media organisations find themselves at the centre of the in-groups, particularly in Figure 2, where the BBC and Bayerischer Rundfunk, two early and influential sets of AI guidelines, are at the centre of the in-group block.

Formal Characteristics

Results pertaining to length, date of first publication, title keyword, remit, accountability, audience, reference to professional roles, and dynamization are presented below.

Figure 3: Distribution of AI Guidelines by Word Length

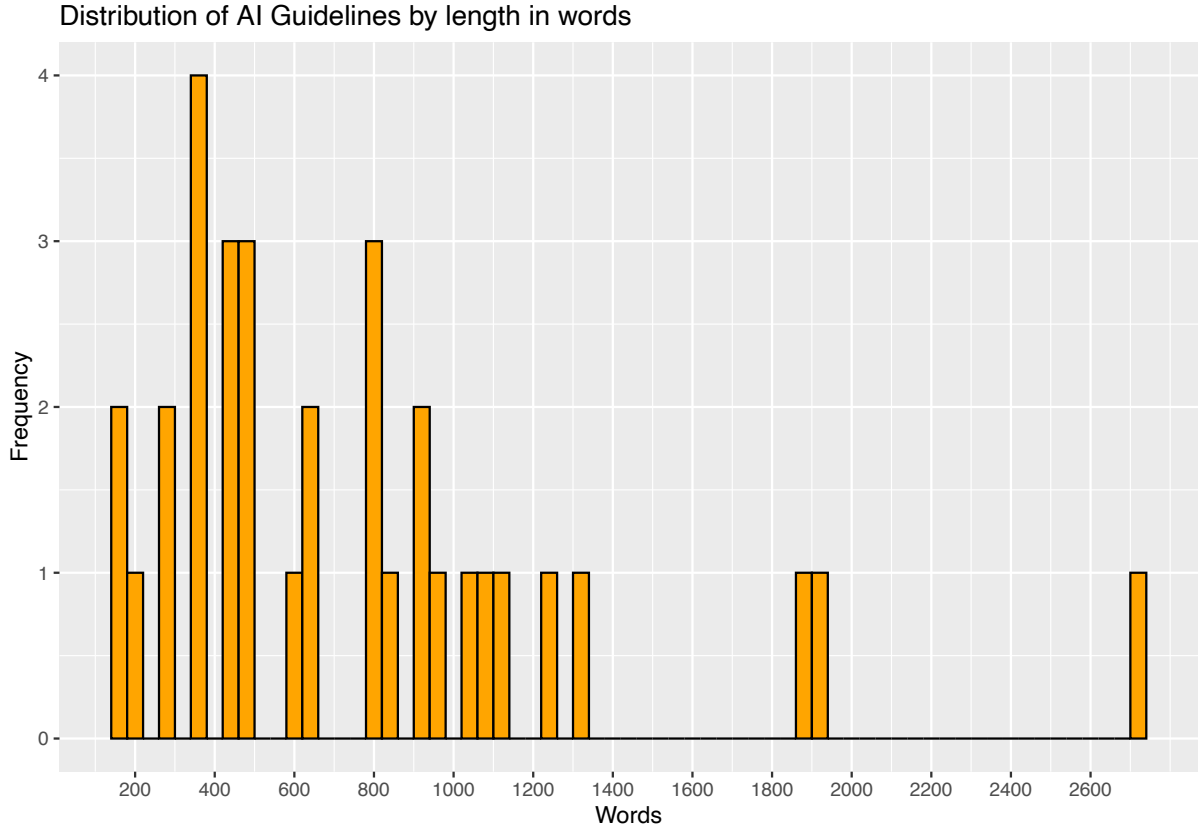
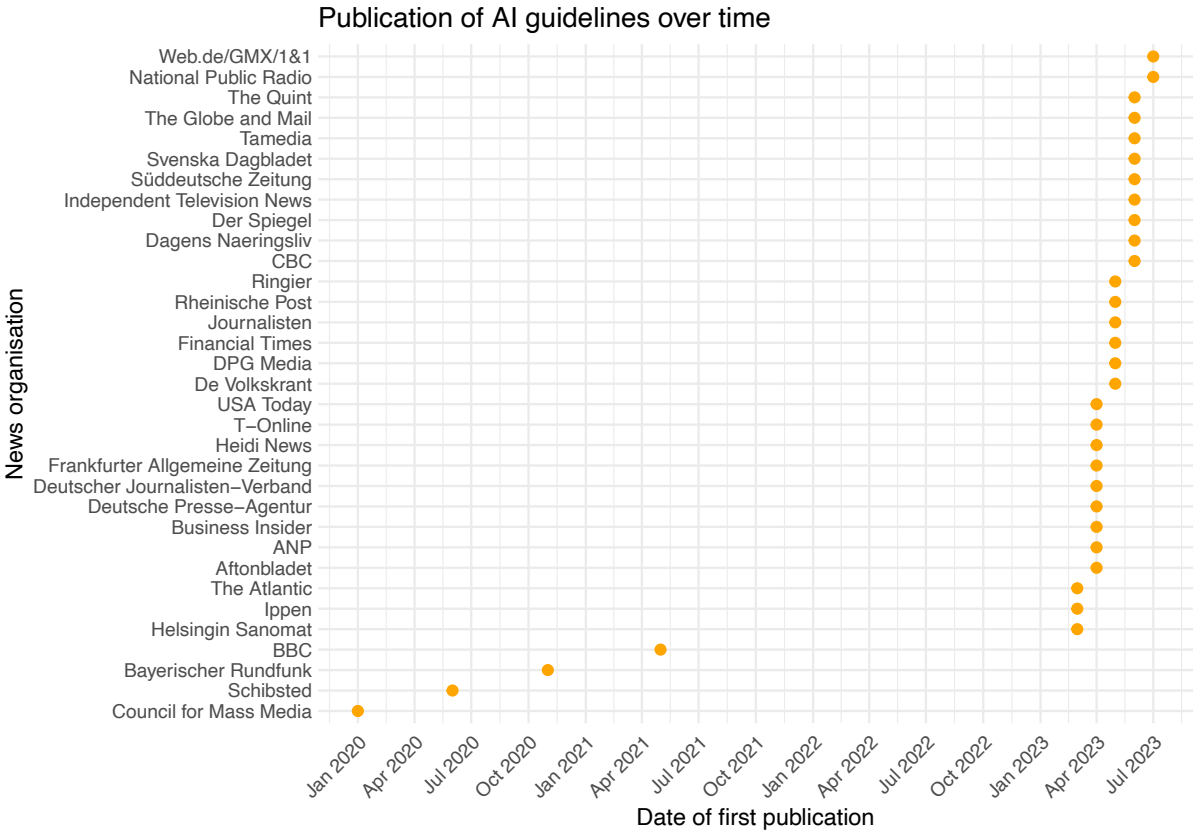


Figure 4: Distribution of AI Guidelines by Date of First Publication, if known (n=33).



As Figure 3 shows, the documents vary considerably in **length** (see also Table 4 in the Appendix). The shortest consists of only 87 words or 506 characters including spaces, the longest has 3972 words (25,192 characters). The arithmetic mean of all AI guidelines included in our study is 780 words or 4899 characters. For 33 guidelines (63.46%), the **month of publication** was available (see Figure 4). The earliest document in our study are the Finnish Press Council's guidelines, published in January 2020, while the latest documents were published in July 2023 by US public broadcaster National Public Radio and the German online news sites web.de/GMX/1&1. The release of ChatGPT in November 2022 is likely to have boosted the development of AI guidelines in the media industry: A total of 33 guidelines with a known release date (87.88%) were published in 2023, but only one in 2021 (3.03% each) and three in 2020 (9.09%).

The findings from the analysis of **title keywords** (Table 2) reveal a diverse range of terms used to frame AI guidelines. The most common term is 'Guideline,' accounting for 30.77% of the sample. Other prevalent terms include 'How-to'-phrases (13.46%), 'Policy' (13.46%), and 'Principles' (7.69%). Less frequently used terms include 'Framework' (3.85%) and 'Guide' (1.92%). Notably, some documents do not have explicit title keywords (7.69%). Regarding the **remit of the AI guidelines** – stating which part of the news organisation falls under the guidelines and must abide by them (Table 3) – the majority of documents are designed for the newsroom and journalists,

constituting 69.23% of the sample. About 28.85% of the guidelines are intended for all departments within the news organisation. There is a single instance (1.92%) where the AI guidelines pertain to the business side only. None of the documents specify other remits, and there are no instances where the remit is not specified.

Table 2: Title Keywords used in the AI Guidelines

Title keyword	n	%
Charter	1	1.92
Framework	2	3.85
Guidance	1	1.92
Guide	1	1.92
Guideline	16	30.77
How-to	7	13.46
Letter	1	1.92
Note	3	5.77
Policy	7	13.46
Position paper	1	1.92
Principles	4	7.69
Statement	1	1.92
Other	3	5.77
None	4	7.69
Total	*52*	*100*

Table 3: Remit

Remit	n	%
All departments	15	28.85
Business development	1	1.92
Newsroom/journalists	36	69.23
Other	0	0.00
Not specified	0	0.00
Total	*52*	*100*

The examination of **accountability mechanisms** – the question if AI guidelines will be enforced and compliance controlled in some way – (Table 4) indicates that only 7.69% of the documents explicitly mention such mechanisms, while 92.31% do not. Moreover, the guidelines mostly lack details on how enforcement will occur. Regarding the **intended audience** (which differs from remit as it specifies if the guidelines are meant for internal, external consumption or both), Table 5 shows that 34.62% of the guidelines are directed towards internal stakeholders, 28.85% towards external audiences, and 36.54% are intended for both internal and external consumption. 73.08% of guidelines furthermore mention one or several **professional roles** within the guidelines such as 'editor-in-chief' or 'legal staff' for whom the guidelines either apply

in specific ways or who serve as points of contact for other people within the organisation.

Table 4: Accountability

	n	%
Yes	4	7.69
No	48	92.31
Total	*52*	*100*

Table 5: AI Guidelines' Intended Audiences

	n	%
Internal	18	34.62
External	15	28.85
Both	19	36.54
Not specified	0	0.00
Total	*52*	*100*

Finally, on the **dynamization of guidelines** – the question if guidelines will be updated – 63.46% stated that guidelines will be updated, 36.54% did not mention the same. However, the timing of such updates appears to be an area of varied opinions, with a notable preference for a less rigid and more adaptable approach. Out of the 33 guidelines mentioning dynamization, only 6.06% specified a particular interval for updates, with the majority (93.94%) leaving the same unspecified.

Thematic Characteristics

Journalistic Values and Conditions for Use of AI

We also analysed guidelines' reference to **journalistic values** drawing on Deuze's classification of journalism's 'occupational ideology' that can be recognised worldwide (2005). These five traits include 'Public Service', 'Objectivity', 'Autonomy', 'Immediacy', and 'Ethics'. Overall, 71.15% of the documents mention one or more of these journalistic values, while 28.85% do not mention any. For **allowed applications** of AI in the journalistic process, 86.54% of the documents explicitly state where AI is permitted, while 13.46% do not provide such information. Similarly, in relation to **prohibited applications** of AI in journalism, 67.31% of the guidelines specify where AI cannot be deployed, whereas 32.69% do not mention prohibited applications. In Table 6, we provide additional breakdowns for allowed and prohibited AI applications along the chain of gatekeeping (adapted from Domingo et al., 2008).

Table 6: Allowed and Prohibited AI applications

	Access & observation		Processing & filtering		Distribution	
	n	%	n	%	n	%
Yes	23	44,23	22	42,31	29	55,77
Partial	1	1,92	1	1,92	0	0,00
No	2	3,85	3	5,77	1	1,92
Not specified	26	50,00	26	50,00	22	42,31
Total	*52*	*100*	*52*	*100*	*52*	*100*

In 69.23% of cases, guidelines also mentioned potential **pitfalls of AI** that staff should be aware of while 30.77% did not refer to the same. The three most mentioned pitfalls in AI guidelines were hallucinations, wherein the AI fabricates facts, with e.g., one guideline stating that the organisation takes a 'source-critical approach to AI-generated material' in response. Second, bias of AI models – the tendency to perpetuate existing biases, such as those based on race, gender, ethnicity, and other factors, thereby reinforcing societal inequalities – was frequently mentioned. Finally, some guidelines expressed concerns about copyright and intellectual property, with AI-generated content violating licensing terms, plagiarising existing material, and potentially infringing on intellectual property rights. Looking at the question if **guidelines reference specific AIs**, AI engines or LLMs as examples of existing or possible AI deployment, we found an even split with 50.00% citing examples (most commonly ChatGPT, DALL-E, and Midjourney), while the remaining 50.00% did not.

Transparency and Human Supervision

Looking at forms of how to deal with the deployment of AI in the journalistic process, 90.38% of organisations reference **transparency** – the fact that the use of AI has to be disclosed – in their AI guidelines. However, it should be noted that 82.98% do not explicitly specify how this transparency should be communicated, as is evident from table 7.

Table 7: How to Communicate Transparency

	n	%
Byline	2	4,26
Endnote	3	6,38
Text box	1	2,13
Register entry	2	4,26
Not specified	39	82,98
Total	*47*	*100*

Looking at the qualitative results for all organisations who reference transparency, we see some further variation beyond the method of disclosure, namely

on when and where this must happen. A few outlets are very prescriptive and detailed, with one outlet, for example, writing that 'the editorial team shall indicate when a news item or part of the information offering has been produced wholly or partly on the basis of automated processes and, as far as possible, refer to the sources on which the news item is based,' before listing examples. Many are less specific with one recommending that AI use is labelled when AI 'is used as more than a mere aid,' but leaving this at the discretion of staff. Overall, the emphasis seems to be on the use of AI for texts, followed by images, with content recommendation only receiving limited attention.

When it came to **human supervision** of AI, 84.62% of organisations stipulated supervision in some form. Still, table 8 shows that news organisations have no unanimous way of handling human supervision.

Table 8: Human Supervision

Area of supervision	**Text/product**		**algorithm**	
	n	%	n	%
Anytime	34	65.38	9	17.31
Sometimes	5	9.62	5	9.62
Never	0	0.00	38	73.08
Not specified	13	25.00	0	0.00
Total	*52*	*100*	*52*	*100*

Responsible AI in Journalism

Looking, next, at three specific forms of responsible AI – concern for **data privacy, source protection, and algorithmic bias** – we find a somewhat heterogenous picture as table 9 shows.

Table 9: Elements of Responsible AI

Reference to...	**Yes**		**No**		***Total***	
	n	%	n	%	*n*	*%*
... data privacy	28	53,85	24	46,15	*52*	*100*
... algorithmic bias	19	36,54	33	63,46	*52*	*100*
... source protection	28	53,85	24	46,15	*52*	*100*
Average	*25*	*48,08*	*27*	*51,92*	*52*	*100*

The qualitative data demonstrates that many guidelines emphasise the protection of vulnerable groups and contributors' privacy, urging against uploading or using confidential or sensitive information in AI engines. Source protection is a recurring theme, with guidelines ensuring that AI platforms are not given access to sensitive, source-protected, or unpublished information, with one organisation for

example writing that 'we protect the privacy of sources and do not share sensitive material or personal data.' Similarly, for algorithmic bias, those guidelines that mention the same show e.g., concern for unfair discrimination stemming from biases in training data or caution against the use of AI that could lead to the 'discriminat[ion] against any individual or group based on race, ethnicity, religion, gender, sexual orientation, or any other characteristic.'

Cooperation and Dependency

Internal cooperation on AI between different departments within news organisations was present in 36.54% of cases. Organisations mentioned that they had 'several teams across departments studying AI' or outlined how AI was a topic for 'legal, tech, finance, HR' and all other departments. In terms of **external cooperation** with e.g., technology companies, consultants, researchers, or governments, 17.31% of the guidelines mention the same. Finally, on **dependency**, only 9.62% of the surveyed news organisations' guidelines make any reference to possible dependencies on platform companies or other technology companies when it comes to the development and deployment of AI. One news organisation, for example stresses the importance of 'independence [...] not only from political but also from technical influences' while another argues that 'greater independence from commercial big-tech providers is desirable.' The majority, 90.38%, however, do not make any reference to dependency.

Discussion

It is time to return to the questions we set out in the beginning, namely *to what extent international news organisations' AI guidelines exhibit isomorphic tendencies (RQ0),* i.e., to what degree can we find homogeneity between them. The overall picture that emerges provides evidence for isomorphic tendencies leading to homogeneity, but within bounds.

The syntactical similarity analysis supports that media organisations borrow wordings from each other when developing AI guidelines (*RQ0 & RQ1*). To the extent these borrowed wordings also encode meanings, the statistical comparison by Cosine Distances also supports the concept that ideas are shared across organisations. The results further indicate the presence of at least a moderate degree of isomorphism in AI guidelines as illustrated by the presence of an in-group cluster of organisations.
On the matter of comparative convergence, the results offer some preliminary support to the idea that convergence has progressed further in editorial guidelines than in AI-use guidelines, which makes sense given the relative novelty of AI guidelines. Editorial guidelines simply have had a longer time to converge. While the findings in Figure 2 (AI Guidelines) clearly show the grouping dynamics and red tiles indicative of shared wordings and thus are consonant with on-going convergence, that convergence process has not progressed as far as it has in the editorial guidelines sample (Figure 1), which has more red-end-of-the-spectrum tiles. When it comes to AI guidelines on a syntactical level, the processes of isomorphism are nascent rather than fully developed.

Conceptual isomorphism (*RQ0 & RQ1*) may be a different story entirely, however. Journalists and publishers may not use the same words for the same concepts even if there is broad agreement on the why, how, and what of AI guidelines in journalistic settings. And indeed, the quantitative coding results show homogeneity for almost two thirds of the variables (assuming a threshold of >60%). On the *formal level*, documents vary in length but most fall within the approximate range of 200 to 1000 words. A majority governs the editorial realm of journalists and the newsroom (69.23%), mentions specific professional roles as relevant stakeholders (73.08%), states that the guidelines should be updated at some point (63.46%), but also lacks any reference to accountability mechanisms (92.31%). Regarding the *thematic features*, our coding again shows general patterns across publishers. 71.15% refer to journalistic values, with 'trust' (46.15%) and 'accuracy' (44.23%) named most often. It is also common that AI guidelines cover at least some forms of allowed or prohibited applications, with more news outlets mentioning allowed (86.54%) than prohibited ones (67.31%). A majority of 69.23% refers to possible pitfalls that can result from using AI in journalism. The documents were also quite homogenous in dealing with transparency and human supervision of AI-generated content. 90.38% of news outlets refer to transparency, although most do not specify how to communicate the same, and 84.62% stress the importance of human supervision, although such oversight is mostly applied to text generated or otherwise edited by AI. 65.38% require human supervision at all times.

Regarding the quantitative coding, AI guidelines display a marked degree of homogeneity, especially compared to social media guidelines. While some difference remains, due to the distinct requirements of media organisations and the early stage of AI guideline development, the overall similarity across guidelines is striking, especially compared to the lack of similarity research has uncovered in social media guidelines.

We turn next to more specific research questions ($RQ2_a$ and $RQ2_b$) – if national and organisational idiosyncrasies continue to shape publishers' practices within the overall trend towards homogeneity. While the small sample size does not allow for rigorous statistical analysis and means that these cursory results must be interpreted with caution, we can see some variance across organisational types (commercial vs. public service) and country when looking 'under the hood'.

A difference seems to emerge mainly between publicly funded and commercial publishers – but not necessarily as expected. Surprisingly commercial media organisations' guidelines seem to be more fine-grained and contain significantly more information on permitted and prohibited applications (see Appendix, Table 4). For example, the protection of sources, which plays a role especially when sensitive information is entered into the interface of LLMs, is emphasised above all by commercial broadcasters and legacy newspapers (see Appendix, Table 5), the latter are also significantly more concerned than average about data protection, perhaps owing to the risk legal liability poses to their business models.

Commercial media also make more statements about possible pitfalls of AI (see Appendix, Table 6) which also ties in with the fact that this group more often tends to demand transparency in the use of AI and more frequently calls for human control

of the products generated or edited by AI, compared to public media (see Appendix, Table 7). So the conclusion that publicly funded broadcasters tend to establish a 'stricter ethical regime' than privately funded media outlets, as Sánchez Laws & Utne (2019) have shown regarding social media guidelines, seems questionable for AI guidelines.

Where public media are ahead is the human control of algorithms; they are more aware of this topic than private-sector actors (see Appendix, Table 8) – possibly due to their high degree of organisation and the associated professional specialisation within editorial teams. Less surprising is that commercial media are somewhat more permissive when it comes to the use of AI than their publicly financed or public-service oriented counterparts (see Appendix, Table 9). This seems especially true for news agencies which allow AI to be used across most levels of the journalistic process much more than the average (see Appendix, Table 10), potentially owing to their early adoption of the technology.

The data also shows *some variance across different countries* ($RQ2_b$). A set of four countries refers to journalistic values at least ten percentage points more often than average: Belgium, Canada, the United Kingdom and Germany (see Appendix, Table 12). Guidelines from Belgium and Finland allow for AI use more often than average on all three levels of the journalistic process (see Appendix, Table 13). Possible pitfalls of AI are most often mentioned by organisations in Canada, Norway, and the United Kingdom (see Appendix, Table 14). While many organisations make statements about transparency and human oversight, organisations in Canada, the Netherlands, Switzerland, and the United Kingdom are significantly above average (see Appendix, Table 15). When it comes to elements of Responsible AI (see Appendix, Table 16), organisations in Canada, the United Kingdom, Netherlands, and Germany have a particularly strong emphasis on data privacy in their guidelines. Algorithmic bias is covered most often by organisations in Western Europe, especially in the United Kingdom, the Netherlands, and Switzerland. Source protection, on the other hand, is mainly a topic for Scandinavian countries, although outlets in Canada and the United States also mention this more often than average.

Finally, the analysis of current AI guidelines within news organisations also revealed *several blind spots (RQ3)*. First, the vast majority of guidelines are essentially toothless regarding enforcement of violations or broader oversight of what they stipulate. Similarly, while many organisations demand the supervision of output, oversight over algorithms and technical systems seems limited. A third notable absence are explicit directives regarding external collaborations, e.g., with technology vendors, researchers, or other stakeholders. Given the increasing reliance on external expertise in the development and deployment of AI, guidelines could include provisions for transparent and ethical engagement with such actors. Most AI guidelines also did not address questions of technological dependency, a factor that holds implications for the autonomy of news organisations (Simon, 2022). Few discussed safeguarding editorial independence and self-reliance when it came to AI. Likewise, few organisations specified

if and when their guidelines would be updated, a noteworthy omission considering the fast-moving nature of the field.

In addition, we identified several blind spots in our qualitative coding that matter in as much as they are part of the current discourse around AI but were not discussed in the guidelines at all. First, while serving audiences was often mentioned, solicitating audience feedback on guidelines or engaging audiences on AI use was conspicuously absent – an interesting facet amidst industry discussions stressing the need for greater audience engagement. Likewise, references to recent debates around sustainable AI and AI supply chains (Brown, 2023; van Wynsberghe, 2021) which shed light on the environmental and societal impact and harm of AI development and use, were notably absent. The impact of AI use on existing power asymmetries (Arguedas & Simon, 2023), especially with respect to local and cultural diversity, received only fleeting references in very few instances. Similarly, issues of workplace surveillance through AI (Ebert et al., 2021), data colonialism (Couldry & Mejias, 2019), labour exploitation and potential human rights abuses associated with AI training received no attention from any of the guidelines. The oversight of these facets underscores the need for a more comprehensive integration of ethical considerations.

Limitations

It is worth briefly dwelling here on the limitations of this study. First, the uneven distribution of sources across different geographical regions is a notable caveat. Our reliance on a larger number of German sources in comparison to sources from other regions introduces a potential source of bias in the findings. The sample size, while valuable for exploratory insights and exceeding previous research, remains limited in its scope. This limitation is particularly pronounced when considering the Global South, which is inadequately represented here despite concerted efforts to include guidelines from more news organisations in India and Brazil.

Moreover, the study encountered restrictions in accessing guidelines from certain organisations. Some publishers acknowledged having or working on guidelines but were unwilling to share them. From background conversations we learned that often this could be attributed to concerns surrounding divulging proprietary strategies and thus potentially losing a competitive advantage. Some were also concerned about looking amateurish vis-à-vis their peers if they released guidelines too early. Organisations might also be wary of disclosing their approaches to issues such as dependency on major technology corporations, lest it jeopardise their response to the same.

Furthermore, it should be acknowledged that this study does not encompass the entirety of internal guidelines that some organisations have, with a number of organisations maintaining more extensive internal guidelines that in some but not all cases were beyond our purview. These internal documents often provide more granular instructions for staff members, beyond what is publicly available.

It is important to note that our analysis examines the outcome – homogeneity – of a process that has likely already occurred (though it is likely to be still ongoing at the time of writing). But while we can assume that an isomorphic process has transpired (and can elaborate on potential driving factors), we cannot establish causality or

definitively prove that this has been the case. This aspect will require further research and delving into the motivations behind these guidelines and the processes shaping their creation.

Conclusion

Institutional isomorphism offers plausible explanations for our observations. DiMaggio & Powell contend that 'the greater the extent to which technologies are uncertain or goals are ambiguous within a field, the greater the rate of isomorphic change' (1983, p. 156). This certainly holds true for the current state of AI in journalism. The uncertainty surrounding the trajectory of the technology is significant and many organisations are grappling with defining their goals for AI. Moreover, the more ambiguous AI's nature, what it could enable, and what should crucially be done about it, the more likely organisations will emulate successful entities that preceded them. Certain guidelines, such as those of the BBC and Bayerischer Rundfunk, which have gained widespread attention through industry publications and conferences, have served as influential benchmarks for others. Additional predictors of isomorphism include the strong professionalism evident in journalism, both nationally and globally. Journalism is becoming more internationally connected, facilitated by digital media, the exchange of labour, and collaborations among major players. In the AI domain, the core community working on it remains relatively small, and initiatives like the London School of Economic's Journalism AI initiative provide vital platforms for idea exchange. Both could have contributed to similar patterns emerging in the guidelines of international news organisations.

Ultimately, it should not be forgotten that both the race to AI and the establishment of AI guidelines are also a quest for legitimacy. Formulating an AI policy – one that resembles those of successful organisations and accedes to common demands on how AI should be used and regulated – also functions as a form of signalling. By having an AI policy, a publisher conveys some important information about themselves, in this case likely to make their commitment to the ethical use of AI observable and to show to competitors that yes, they too, are innovative. This, of course, ultimately raises the point who and what AI guidelines are really for – are they a mere PR exercise, dressed up in form of a policy or a meaningful contribution to regulating a technology in the face of uncertainty. While only future research will be able to answer this question, we can assume that reality is more nuanced. Publicly, at least, many organisations assert that their motivation behind formulating such guidelines stems from the dynamic nature of the environment in which they operate, with guidelines intended to serve as an initial framework, offering a sense of security to staff, readers, and partners. Many seem to have emerged in response to both internal calls for direction and a perceived need to address external demands. Establishing legitimacy is part of the answer, not the whole story.

Lastly, isomorphism theory argues that a field's dependence on a single source leads to greater isomorphism. Where DiMaggio & Powell referred to a 'single source of

support for vital resources' (1983, p. 155) and resource centralisation, AI, as a large technological system (Simon, 2023a), comes into play. One does not have to fully embrace technological determinism to assume that AI has a shaping power of its own. It thus acts as a coercive force with broadly similar effects across contexts, resulting in analogous reactions, including in the development of AI guidelines. While we could hypothesise that all organisations developing AI policies simply began at similar starting points with equivalent concerns and knowledge about the technology, it is also considerably less elegant as a theory to explain the similarities we can observe. Occam's razor would suggest that they modelled aspects of their policies on each other.

With this paper we hope to help lay the groundwork for future analysis and work in this area. We are at juncture on the road to more substantive AI use and, by extension, regulation in journalistic work. One should nevertheless remember that many AI guidelines are early examples, developed quickly in response to the launch of ChatGPT and due to concerns about the speed with which generative AI became accessible to the public and journalists. And while the notion that AI guidelines in and of themselves will somehow magically resolve the intricacies of AI implementation and its attendant challenges is questionable, they can potentially make an important contribution in ensuring the responsible, ethical, and effective use of the technology in the news. Part of the significance of these findings also lies in the fact that this self-regulation for AI is well underway, with a sizable number of publishers having begun to establish strategies addressing various critical aspects of the technology. Crucially, while there remains ample room for improvement, these pioneering organisations, many of them leaders in the news industry, are poised to influence and set a precedent for broader industry practices, thus facilitating a trickle-down effect of their AI guidelines and strategies. How unanimous these will and should be remains to be seen. For now, we can see that there are some overlapping trends among AI guidelines but also a considerable degree of variety and we withhold judgment at this point if this is to be celebrated or rectified.

Future questions abound. For one, AI guidelines often emerge from internal consultation processes that involve various departments, sometimes building upon pre-existing materials. One question here will be which 'tribes' – editorial, business, tech – within news organisations will exert dominance in shaping the ideas and logics embedded in these guidelines. A second line of inquiry pertains to what kinds of organisations that release or craft both internal and external AI guidelines. Understanding which organisations engage in this practice and the reasons behind those that opt not to (be it due to deeming guidelines unnecessary or as potential hindrances to their operations) will tell us something about the future direction of AI in journalism. Finally, against the backdrop of industry efforts to develop a set of principles, rights, and obligations regarding the use of AI-based systems, the question looms along which lines these guidelines will develop. Will we have more standardisation and homogeneity, or will we see more customisation in the future? For now, publishers seem to embark on this journey from somewhat similar points.

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Appendix

Table 1: Qualitative Coding Codebook

No.	Variable	Description
	Formal level	
1	Professional roles	List all professional roles such as 'editor-in-chief' or 'legal team' which are mentioned in the guidelines
	Thematic level	
	Journalistic values and goals of AI deployment	
2	Values	Name all journalistic values, e.g. 'trust' and 'accuracy' which are included in the document
3	Goals	Collect all wordings where the organisation refers to the specific goals it wants to achieve by deploying AI
	Allowed and prohibited AI applications	
4	Allowed applications	List all AI applications allowed according to the policy
5	Prohibited applications	List all AI applications prohibited according to the policy
6	Mentioned pitfalls	Collect each possible pitfall mentioned that can be associated with the deployment of AI
7	AI engines	Name all AI engines such as LLMs or image generators that are explicitly called
	Transparency	
8	Applications relevant for transparency	Collect all wordings where the guidelines mention AI uses cases that should or must be made transparent to the audiences
	Responsible AI	
9	Elements of data privacy	Name all elements of data privacy that are included in the document
10	Elements of Responsible AI	Include all references to elements of Responsible AI
11	Elements of algorithmic bias	Collect all phrases where the guideline refers to elements of algorithmic bias associated with the deployment of AI
12	Elements of source protection	Search for text elements where the guidelines say something about possible risks in source protection associated with the use of AI
	Cooperation	
13	Professional roles involved	Name each professional role that is named in terms of possible internal cooperation on AI projects
14	Institutions involved	Collect each institution that is named when the guideline makes statements about external cooperation
	Dependency	

15	Types of dependency	Include all references to possible risks of dependency on platform companies associated with the deployment of AI

Table 2: Quantitative Coding Codebook

No.	Variable	Values	Description
		Formal level	
1	Title keyword	Guideline, Guidance, Framework, Principles, Letter, Note, Policy, How-to, Charter, Position paper, Statement, Other, None	How is the document labelled according to the keyword used in the title?
2	Remit	Newsroom/Journalists, Business development, Other, All departments, Not specified	Which part of the news organisation falls under these guidelines?
3	Accountability	Yes, No	Do the guidelines mention an accountability mechanism, e.g. how guidelines will be enforced?
4	Audience	Internal, External, Both, Not specified	Are the guidelines meant for internal, external consumption or both?
5	Reference to professional roles	Yes, No	Do the guidelines mention certain professional role(s) within the organisation?
6	Reference to dynamization	Yes, No	Do the guidelines state that they might be updated one day?
7	Interval	Specified, Unspecified	If so, is the interval specified?
		Thematic level	
		Journalistic values and goals of AI deployment	
8	Reference to values	Yes, No	Do the guidelines refer to journalistic values at some point? In the following, Deuze's concept of five core values will be adapted
9	...Public service	Yes, No	Definition: 'Journalists provide a public service (as watchdogs or 'news-hounds', active collectors and disseminators of information)'
10	...Objectivity	Yes, No	Definition: 'Journalists are impartial, neutral, objective, fair and (thus) credible.'
11	...Autonomy	Yes, No	Definition: 'Journalists must be autonomous, free and independent in their work.'
12	...Immediacy	Yes, No	Definition: 'Journalists have a sense of immediacy, actuality and speed (inherent in the concept of 'news').'
13	...Ethics	Yes, No	Definition: 'Journalists have a sense of ethics, validity and legitimacy.'
14	...Trust	Yes, No	Do the guidelines mention possible trust issues associated with the deployment of AI?
15	...Accuracy	Yes, No	Do the guidelines mention possible accuracy issues associated with the deployment of AI?
		Allowed and prohibited AI applications	
16	Reference to applications	Yes, No	Does the document state where AI shall be deployed in the journalistic process?

17	Reference to prohibition	Yes, No	Does the document state where AI shall not be deployed in the journalistic process?
18	Status: Access and observation	Yes, Partial, No, Not specified	Do the guidelines allow AI to gather information, angles, ideas and outlines (creative purposes)?
19	Status: Processing and filtering	Yes, Partial, No, Not specified	Do the guidelines allow to process and filter the editorial content (editing, updating, augmenting)?
20	Status: Distribution	Yes, Partial, No, Not specified	Do the guidelines allow to augment the editorial content with respect to distribution (headline generation, social media posts, summaries, content moderation)?
21	AI-generated text	Yes, Partial, No, Not specified	Is AI-generated text allowed according to the policy?
22	AI-generated images	Yes, Partial, No, Not specified	Are AI-generated images allowed according to the policy?
23	Reference to pitfalls?	Yes, No	Do the guidelines refer to possible pitfalls of AI/LLMs?
24	Reference to AI engines/LLMs	Yes, No	Do the guidelines name specific engines or LLMs?
		Transparency	
25	Reference to transparency	Yes, No	Is it necessary to make transparent when AI is used at some point?
26	Method of creating transparency	Byline, Endnote, Box, Register Entry, Not specified	Are there any specific requirements set up in which way AI deployment has to be made clear?
		Human supervision	
27	Reference to human supervision	Yes, No	Do the guidelines refer to human supervision of AI-generated content at some point?
28	...text/product supervision	Anytime, Sometimes, Never, Not specified	Is human supervision of AI-generated content required at some point?
29	...algorithmic supervision	Anytime, Sometimes, Never, Not specified	Is human supervision limited to checking the integrity of the algorithm deployed (instead of checking every AI-generated contribution)?
		Responsible AI	
30	Reference to data privacy	Yes, No	Do the guidelines refer to data privacy at some point?
31	Reference to algorithmic bias	Yes, No	Do the guidelines refer to algorithmic bias at some point?
32	Reference to source protection	Yes, No	Do the guidelines specify which editorial content may be uploaded to LLMs?
		Cooperation	
33	Reference to internal cooperation	Yes, No	Do the guidelines refer to cooperation between different parts of the organisation at some point?
34	Reference to external cooperation	Yes, No	Do the guidelines refer to cooperation with external entities at some point?
		Dependency	
35	Reference to dependency	Yes, No	Do the guidelines mention possible dependencies for news organisations from platform companies developing AI engines?

Table 3: Benchmark Sample of Editorial Guidelines

Name	Country
ABC	Australia
Axel Springer	Germany
Der Standard	Austria
Main-Post	Germany
Mindener Tagblatt	Germany
Reportagen	Germany
Sky News	UK
Stern	Germany
The Sun	UK
Die Zeit	Germany

Table 4: Reference to Allowed and Prohibited AI Applications, by Funding of News Outlets (in %)

Allowed/prohibited uses	Private	Public
Yes/Yes	76.92	30.77
Yes/No	12.82	46.15
No/Yes	0.00	7.69
No/No	10.26	15.38
Total	*100*	*100*

Table 5: Reference to Elements of Responsible AI, by Organisation Type (in %)

	Data privacy		Algorithmic bias		Source protection	
	Yes	No	Yes	No	Yes	No
Commercial Broadcaster	66.67	33.33	66.67	33.33	100.00	0.00
Digital-born media	50.00	50.00	33.33	66.67	33.33	66.67
Legacy newspaper	61.54	38.46	38.46	61.54	69.23	30.77
Magazine	25.00	75.00	25.00	75.00	50.00	50.00
Media group	57.14	42.86	42.86	57.14	42.86	57.14
News agency	33.33	66.67	16.67	83.33	50.00	50.00
Professional organisation	75.00	25.00	25.00	75.00	25.00	75.00
Public broadcaster	55.56	44.44	44.44	55.56	55.56	44.44
Average	*53.03*	*46.97*	*36.55*	*63.45*	*53.25*	*46.75*

Table 6: Reference to Pitfalls of AI in Journalism, by Funding of News Outlets (in %)

	Yes	No
Private	74.36	25.64
Public	53.85	46.15
Average	*64.10*	*35.90*

Table 7: Reference to Transparency and Human Supervision, by Funding of News Outlets (in %)

Transparency/Human Supervision	Private	Public
Yes/Yes	79.49	76.92
Yes/No	10.26	15.38
No/Yes	7.69	0.00
No/No	2.56	7.69

Table 8: Reference to Algorithmic Supervision, by Funding of News Outlets (in %)

	Anytime	Sometimes	Not Specified
Private	12.82	12.82	74.36
Public	30.77	0.00	69.23

Table 9: AI in the Journalistic Process, by Funding of News Outlets (in %)

	Access and observation				Processing and filtering				Distribution			
	Yes	Partial	No	Not Spe.	Yes	Partial	No	Not Spe.	Yes	Partial	No	Not Spe.
Private	48.72	0.00	5.13	46.15	46.15	0.00	7.69	46.15	56.41	0.00	2.56	41.03
Public	30.77	7.69	0.00	61.54	38.46	0.00	0.00	61.54	53.85	0.00	0.00	46.15

Table 10: AI in the Journalistic Process, by Organisation Type (in %)

	Access and observation				Processing and filtering				Distribution			
	Yes	Partial	No	Not spe.	Yes	Partial	No	Not spe.	Yes	Partial	No	Not spe.
Comm. Broadcaster	0.00	0.00	0.00	100.00	66.67	0.00	0.00	33.33	0.00	0.00	33.33	66.67
Digital-born media	50.00	0.00	16.67	33.33	83.33	0.00	0.00	16.67	50.00	0.00	0.00	50.00
Legacy newspaper	69.00	0.00	7.69	23.08	46.15	0.00	15.38	38.46	69.23	0.00	0.00	30.77
Magazine	25.00	0.00	0.00	75.00	25.00	0.00	25.00	50.00	75.00	0.00	0.00	25.00
Media group	14.29	0.00	0.00	85.71	14.29	0.00	0.00	85.71	28.57	0.00	0.00	71.43
News agency	83.33	0.00	0.00	16.67	50.00	0.00	0.00	50.00	83.33	0.00	0.00	16.67
Prof. Organisation	50.00	0.00	0.00	50.00	75.00	0.00	0.00	25.00	75.00	0.00	0.00	25.00
Public broadcaster	22.22	11.11	0.00	66.67	22.22	0.00	0.00	77.78	44.44	0.00	0.00	55.56
Average	*39.23*	*1.39*	*3.04*	*56.31*	*47.83*	*0.00*	*5.05*	*47.12*	*53.20*	*0.00*	*4.17*	*42.64*

Table 11: Reference to Journalistic Values, by Organisation Type

	Yes		No	
	n	%	n	%
Commercial Broadcaster	2	66.67	1	33.33
Digital-born media	5	83.33	1	16.67
Legacy newspaper	9	69.23	4	30.77

Magazine	2	50.00	2	50.00
Media group	4	57.14	3	42.86
News agency	4	66.67	2	33.33
Professional organisation	4	100.00	0	0.00
Public broadcaster	7	77.78	2	22.22
Total/Average	*37*	*71.35*	*15*	*28.65*

Table 12: Reference to Journalistic Values, by Country (in %)

	Yes	**No**
Belgium	100.00	0.00
Brazil	0.00	100.00
Canada	100.00	0.00
Finland	75.00	25.00
Germany	81.82	18.18
India	100.00	0.00
Netherlands	75.00	25.00
Norway	50.00	50.00
Sweden	42.86	57.14
Switzerland	75.00	25.00
United Kingdom	100.00	0.00
United States	57.14	42.86
Average	*71.40*	*28.60*

Table 13: AI Allowance in the Journalistic Process, by Country (in %)

	Access and observation				Processing and filtering				Distribution			
	Yes	Partial	No	Not spe.	Yes	Partial	No	Not spe.	Yes	Partial	No	Not spe.
Belgium	66.67	0.00	0.00	33.33	66.67	0.00	0.00	33.33	66.67	0.00	0.00	33.33
Brazil	100.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00
Canada	50.00	50.00	0.00	0.00	0.00	0.00	50.00	50.00	50.00	0.00	0.00	50.00
Finland	50.00	0.00	0.00	50.00	75.00	0.00	0.00	25.00	75.00	0.00	0.00	25.00
Germany	27.27	0.00	9.09	63.64	45.45	0.00	0.00	54.55	45.45	0.00	0.00	54.55
India	0.00	0.00	100.00	0.00	100.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00
Netherlands	50.00	0.00	0.00	50.00	25.00	0.00	0.00	75.00	50.00	0.00	0.00	50.00
Norway	50.00	0.00	0.00	50.00	75.00	0.00	0.00	25.00	50.00	0.00	0.00	50.00
Sweden	42.86	0.00	0.00	57.14	28.57	14.29	14.29	42.86	42.86	0.00	14.29	42.86
Switzerland	25.00	0.00	0.00	75.00	25.00	0.00	0.00	75.00	50.00	0.00	0.00	50.00
United Kingdom	50.00	0.00	0.00	50.00	25.00	0.00	0.00	75.00	50.00	0.00	0.00	50.00
United States	57.14	0.00	0.00	42.86	28.57	0.00	14.29	57.14	71.43	0.00	0.00	28.57
Average	*47.41*	*4.17*	*9.09*	*39.33*	*49.52*	*1.19*	*6.55*	*42.74*	*62.62*	*0.00*	*1.19*	*36.19*

Table 14: Reference to Pitfalls of AI in Journalism, by Country (in %)

	Yes	**No**
Belgium	33.33	66.67
Brazil	100.00	0.00
Canada	100.00	0.00
Finland	50.00	50.00
Germany	72.73	27.27
India	100.00	0.00
Netherlands	75.00	25.00
Norway	100.00	0.00
Sweden	57.14	42.86
Switzerland	25.00	75.00
United Kingdom	100.00	0.00
United States	71.43	28.57
Average	*73.72*	*26.28*

Table 15: Reference to Transparency and Human Supervision, by Country (in %)

	Yes/Yes	Yes/No	No/Yes	No/No
Belgium	66.67	33.33	0.00	0.00
Brazil	100.00	0.00	0.00	0.00
Canada	100.00	0.00	0.00	0.00
Finland	75.00	25.00	0.00	0.00
Germany	72.73	18.18	9.09	0.00
India	100.00	0.00	0.00	0.00
Netherlands	100.00	0.00	0.00	0.00
Norway	75.00	0.00	25.00	0.00
Sweden	85.71	14.29	0.00	0.00
Switzerland	100.00	0.00	0.00	0.00
United Kingdom	100.00	0.00	0.00	0.00
United States	42.86	14.29	14.29	28.57
Average	*84.83*	*8.76*	*4.03*	*2.38*

Table 16: Reference to Elements of Responsible AI, by Country (in %)

	Data privacy		Algorithmic bias		Source protection	
	Yes	No	Yes	No	Yes	No
Belgium	33.33	66.67	33.33	66.67	33.33	66.67
Brazil	0.00	100.00	0.00	100.00	0.00	100.00
Canada	100.00	0.00	0.00	100.00	100.00	0.00
Finland	50.00	50.00	0.00	100.00	50.00	50.00
Germany	72.73	27.27	36.36	63.64	45.45	54.55
India	100.00	0.00	0.00	100.00	100.00	0.00
Netherlands	75.00	25.00	75.00	25.00	25.00	75.00
Norway	50.00	50.00	25.00	75.00	75.00	25.00
Sweden	14.29	85.71	28.57	71.43	100.00	0.00
Switzerland	25.00	75.00	50.00	50.00	25.00	75.00
United Kingdom	75.00	25.00	75.00	25.00	75.00	25.00
United States	57.14	42.86	42.86	57.14	28.57	71.43
Average	54.37	45.63	*30.51*	*69.49*	*54.78*	*45.22*