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FINLAND

Sustaining professional norms with fewer journalists and declining resources

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Introduction

Finland is a small, affluent country with a population of 5.5 million people, characterised by political, socioeconomic, and media structures typical of the Nordic welfare model (Syvertsen et al., 2014). The small size of its media market, together with a distinct language area, contributes to a relatively concentrated media system in the country with well-integrated professional norms and a high reach of the main national news media organisation.

As per Hallin and Mancini's (2004) categorisation, the Finnish media system is considered to represent the democratic corporatist model. Historically, characteristics of the model include strong state intervention, reconciled with well-developed media autonomy and professionalisation. Alongside other Nordic countries, the system has also been characterised with the label media welfare state, whose distinct features involve communication services as universal public goods, institutionalised editorial freedom, cultural policy extending to the media, and a tendency to choose policy solutions that are consensual, durable, and involve cooperation between both public and private stakeholders (Syvertsen et al., 2014: 17; see also Karppinen & Ala-Fossi, 2017). In international assessments, Finland has repeatedly ranked as one of the top countries for media freedom and democracy. Politically, Finland is considered a parliamentary republic with "free and fair elections and robust multiparty competition" (Freedom House, 2020).

Freedom in the World 2021: status "free" (Score: 100/100, stable since 2017) (Freedom House, 2021). Finland is one of the only three countries to receive a perfect score of 100 (Repucci, 2020).

Liberal Democracy Index 2020: Finland is placed in the Top 10% bracket – rank 7 of measured countries, up from 20 in 2016. Finland has reached close to top scores in the liberal, egalitarian, and deliberative aspects of democracy, although with a somewhat lower rank (25) in the dimension of participatory democracy (Varieties of Democracy Institute, 2017, 2021).

Freedom of Expression Index 2018: rank 8 of measured countries, considerably up from 26 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 2 of 180 countries, up from 4 in 2018 (though ranked 1 from 2013–2016). Finland has a strong legal, institutional, and structural basis for free media and journalism (Reporters Without Borders, 2020).

The Finnish news media landscape is diverse in relation to the size of the market, including a high number of regional and local newspaper titles, a strong public broadcaster (Yle, with 45% share of television viewing and 52% of radio listening), domestic private broadcasters, and some emerging digital news outlets. Despite the high number of newspapers and magazines published in Finland, the market is concentrated, with a few major companies (e.g., Sanoma and Keskisuomalainen as the largest publishers) controlling the majority of the market. Additionally, most regional and local markets are dominated by one leading newspaper, with little direct competition. Media ownership concentration, as a result, has been noted as one of the main risks to media pluralism in Finland in the EU Media Pluralism Monitor reports (Manninen, 2018).

Legacy news media also dominate the list of most visited online news sites, led by two competing tabloid newspapers (*Iltalehti* and *Ilta-Sanomat*), public broadcaster Yleisradio Oy (Yle), and the national daily newspaper *Helsingin Sanomat* (*HS*), each with a monthly reach of over three million visitors.

Despite stability in the main institutions, in the last ten years, digital disruption in the media market has significantly impacted the Finnish media land-scape. In particular, circulation of newspapers and magazines has continued to decline throughout the 2010s. A few major outlets, such as *HS*, have found success in increasing their total readership and gaining new digital subscribers, but overall, less than one-fifth of the adult population paid for online news in 2019 (Newman et al., 2019). The total amount of media advertising revenue has remained at the same level since 2010, but the publishing sector's share (newspapers and magazines) has declined from over half to only a third. The share of online advertising has increased from 16 per cent to 35 per cent, with global giants Google and Facebook now controlling over half of all digital advertising (Ala-Fossi et al., 2020: 18).

As a result of declining circulation and advertising revenues, the total number of employees working for the media industry has been reduced by about a fifth in the last decade, with reduction focused on publishing, television, and radio in particular (Ala-Fossi et al., 2020: 14). According to some estimates,

the number of active journalists in Finland has been reduced by as much as a third since 2010.

The journalistic culture in Finland is characterised by a strong professional ethos and an established self-regulatory system, organised around the Council for Mass Media (CMM), which represents all main interest groups and oversees the commonly agreed upon ethical codes. The overwhelming majority of journalists are also members of the Finnish Union of Journalists (UJF), and according to studies, journalists continue to share a rather uniform commitment to core professional norms (Pöyhtäri et al., 2016). In the *Reuters Institute Digital News Report 2019* (Newman et al., 2019), Finnish news media remain the most trusted among all countries included.

Covid-19

At the onset of the Covid-19 pandemic in the spring of 2020, interest in news and journalism significantly increased. In the early stages of the crisis, the number of visitors to websites of main national news outlets was as high as double the normal traffic, and even after that, the demand for news has remained higher than in the normal times. Many outlets have also reported an increase in digital subscriptions by up to 20 per cent.

According to a survey of citizens' trust in various information sources during the pandemic, mainstream news media – and public service media in particular – remained the most preferred and trusted news source for most citizens (Matikainen et al., 2020).

On the other hand, advertising revenue dramatically declined during the crisis. According to a Finnish UJF and Finnish Media Federation (Finnmedia) survey, commercial media organisations have seen a decline of at least one-third and possibly up to 50 per cent in advertising, with print and local newspapers and local radio suffering the most. Over half of all newspapers laid off employees, and a handful of local papers also suspended publication altogether during the crisis (Grundström, 2020).

In response, the Ministry of Transport and Communication sought to support journalism during and after the crisis, and commissioned a report towards this end. It was authored by a former chair of CMM, including proposals for both short-term and long-term support (Grundström, 2020). In a supplementary budget proposal in June 2020, the government endowed EUR 5 million and EUR 2.5 million, respectively, to support journalism and news agencies. While the need for short-term support is less contested, the idea of more permanent support to journalism has been a more divisive issue within the industry. Unlike other Nordic countries, Finland practically abandoned all direct press subsidies since the 1990s, apart from minor support to minority and cultural

outlets. While industry actors have generally preferred indirect subsidies, such as reduced value-added tax, issues pertaining to direct subsidies and other support mechanisms are now back on the media policy agenda.

Leading news media sample

In addition to general observations based on statistical data and existing research, six Finnish news media organisations, representing different sectors and ownership, were selected for closer analysis and interviews. For each news organisation, the editor-in-chief and one other member of the newsroom were interviewed. The sample media included one national, one regional, one local, and one tabloid newspaper, as well as the leading public and private broadcasting companies. The selected news media organisations remained the same as in the 2011 Media for Democracy (MDM) report (Karppinen et al., 2011), except the local newspaper *Borgåbladet* has since then merged with another local paper into a new brand, Ö*stnyland*, and the Nordic telecom company Telia now owns the commercial broadcaster MTV3. In addition to editors and journalists, we interviewed the directors of the Finnish Union of Journalists (UJF) and the Finnish Media Federation (Finnmedia). In total, 14 interviews were conducted, with four women and ten men among the interviewees.

 Table 1
 News media sample and interviewees

	Interviewees	Media type	Ownership	
HS	Editor-in-chief; one newsroom journalist and editor	Daily newspaper	Sanoma Group	
Turun Sanomat	Editor-in-chief; one newsroom journalist	Daily regional newspaper	TS Group	
lltalehti	Editor-in-chief; one newsroom journalist	Tabloid newspaper	Alma Media	
Östnyland	Editor-in-chief; one newsroom journalist	Local newspaper (Swedish language)	Konstsamfunder (foundation)	
YLE	Editor-in-chief, news and current affairs; one journalist	National Public Service Broadcaster	Public Service Broadcaster	
MTV3	Editor-in-chief, news and current affairs; one journalist	Commercial Telia broadcasting		
UJF	President			
Finnmedia	CEO			

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability

3 POINTS

Despite significant changes in the delivery of news, the mainstream news $\frac{\ln 2011}{3 \text{ POINTS}}$ media is accessible throughout the country without any major regional divides.

Newspapers, broadcast, and online services are still widely available nationwide. Although the reach of printed newspapers has been declining, the combined weekly reach of both printed and online papers continues to remain very high, at 92 per cent (Reunanen, 2019). Most newspaper sales are still based on subscription and home delivery, but early-morning delivery is now available only for 8 per cent of total volume of newspapers, which is about 10 percentage points less than in the 2011 MDM study. The total number of newspapers (176) has declined by almost 15 per cent since 2008, while the number of dailies (40) has declined by more than 20 per cent. Now, there are at least two regional centres without their own newspapers.

Besides printed dailies and their online editions, there are also two remarkable digital daily papers with no print edition, *Taloussanomat* (economic news section of *Ilta-Sanomat*) and *Uusi Suomi*. Most of the other newspapers – mainly local publications – are also present online. However, the amount of free online content has declined, as most publications sell their content with digital subscriptions and paywalls; for example, at the moment, two-thirds of *HS* subscribers pay for their digital content. Only afternoon papers *Ilta-Sanomat* and *Iltalehti* offer their content online for free. Consequently, their online versions now have more readers than print.

The original plan was that the first generation of digital terrestrial network television (DVB-T), with 99.96 per cent technical reach, would be shut down and replaced with the second generation of DVB-T in March 2020; however, that was delayed due to a legal dispute. The new nationwide network was completed by June 2020, but the date of the switchover has not yet been set. Over 80 per cent of television-owning households already have DVB-T2 compatible receivers. The number of free nationwide television channels (18) has almost doubled in ten years since 2008. The growth of pay television has stalled to one quarter of households, while satellite television has declined to only 3 per cent. The share of cable and Internet Protocol Television (IPTV) households has also increased over 10 percentage points to 60 per cent (Ala-Fossi et al., 2020).

In 2020, there are altogether 18 nationwide or at least semi-national private radio channels and 53 regional or local private stations. However, the total

number of private licence-holders has decreased to 29, mostly because of changes in frequency allocation as well as ownership concentration. Meanwhile, Yle, Finland's national public broadcasting company – with a legal obligation to provide equal services on a nationwide basis – has six radio channels with at least 50 per cent population coverage, meaning that in most areas, people can choose between 15 to 20 analogue FM radio stations (Ala-Fossi et al., 2020).

Online television viewing now has about 3 per cent share of the weekly reach among the total population, and it is about 7 per cent of the total viewing time. At the same time, both the daily and weekly reach of television is declining (Ala-Fossi et al., 2020). The online audio and video service of national public media, *Yle Areena*, is still the most extensive and increasingly popular online television and radio service, with a growing amount of online-only content. The main commercial broadcasters provide both free and premium content online.

Interestingly, only 5 per cent of households in Finland are still completely without Internet connection. Within less than ten years, mobile broadband has become so popular that 92 per cent of households are using it, and for 41 per cent, it is their only Internet connection. In addition, the monthly use of mobile data per subscription is the highest in the world (19.39 gigabyte). The minimum speed of universal service broadband available for all households nationwide was doubled to two megabits per second in 2015, and it will be raised to five megabits per second by a government decree in 2021 (Ministry of Transport and Communications, 2021). Fast, 30 megabits per second fixed broadband is already available in 73 per cent of households, but only 29 per cent use it (Ala-Fossi et al., 2020).

(F2) Patterns of news media use (consumption of news)

3 POINTS In 2011 2 POINTS

Consumption of traditional media and supply of news content are slowly declining, but in cross-national comparison, the mainstream news media still reach a very high proportion of the population in Finland. News is more highly valued in times of crisis.

The Finnish public has traditionally been quite well informed. Most Finns still consume news media at least on a weekly basis, but the overall reach of news has slightly declined during recent years – especially, the reach of printed newspapers and traditional television has declined. However, in Finland, the online services and applications of traditional media are still followed by 76 per cent of the respondents, which is more than in Sweden (72%) or Norway (71%) (Reunanen, 2019: 7–8). In addition, the Covid-19 pandemic in the beginning of 2020 has increased people's interest in news and current affairs programming, especially television (Matikainen et al., 2020; Koppinen, 2020).

 Table 2
 Daily reach of different media, 2018 (per cent)

Media	All	Male	Female	10–24	25–44	45–59	60–69
Newspapers (printed)	40	41	39	23	28	47	63
Newspapers (online)	56	57	55	40	58	61	58
Television	77	77	77	61	75	84	83
Radio	58	61	54	37	54	65	70
Internet	90	89	92	88	91	92	89

Source: Statistics Finland, 2020a

Similar to a decade ago, the main evening news broadcasts of public service broadcaster Yle and commercial MTV3 continue to be among the most-watched programmes on television. The average total reach of *Yle News* is nearly 2.5 million viewers (Finnpanel, 2020a). However, unlike before, only the three Yle channels and MTV3 now provide broadcast television news – all the other television channels have either abandoned news production or they have never been obligated to provide any news. Despite a small decline, *Yle Radio Suomi* continues to be the most popular radio channel, with 31 per cent share of total listening. It still broadcasts regular hourly news bulletins, which, however, are a bit shorter than those it broadcasted earlier (Finnpanel, 2020b; Yle, 2016).

Perhaps the most dramatic change in media use since the 2011 MDM report has been the collapse of print newspaper readership. In 2008, the leading newspaper *HS* still had a circulation of 400,000 copies and about 950,000 daily readers. Ten years later, the print circulation was only 221,000 copies with 562,000 daily readers. This shows a 40 per cent decline within ten years (Statistics Finland 2020b). However, *HS* is an exception, because since 2017, it has been able to increase its total readership 26 per cent with all-digital subscriptions. Other newspapers are also gaining digital subscribers, but this is lower in proportion to the loss they suffer from readers of print editions (Hartikainen, 2020). The combined weekly reach of newspaper content on all platforms is still quite high (92%), while the weekly reach of printed newspapers is just 12 per cent (Reunanen, 2019).

The five most-popular websites in Finland are still exactly those that were popular in 2011, although their respective order, as well as the methodology of measurement, has changed. Tabloid newspapers with free online content are still the two most-popular news websites, with over 3.8 million monthly visitors. In December 2019, public service *Yle news* and current affairs were seen to be slightly more popular than *MTV3 News* and the *HS* website (FIAM, 2019). At present, the Internet is the main source of news for everyone between the ages 45–54 years and younger. Among people over 55 years of age, television is

still the main source of news, while printed newspapers are important to many people over 65 years old (Reunanen, 2019).

 Table 3
 Top twelve Finnish news websites, December 2019

Website	Visitors per month	Rank among all websites		
Ilta-Sanomat	3,835,746	1		
Iltalehti	3,833,883	2		
Yle News and current affairs	3,554,120	3		
MTV News	3,406,656	4		
HS	3,312,955	5		
Kauppalehti	1,896,957	10		
Aamulehti	1,569,301	11		
Talouselämä	1,088,945	21		
Kaleva	1,080,538	22		
Maaseudun Tulevaisuus	827,248	25		
Uusi Suomi	797,507	26		
Satakunnan Kansa	786,717	28		

Source: FIAM, 2019

(F3) Diversity of news sources

2 POINTS

In 2011 2 POINTS

The role of syndicated content from the national news agency is diminishing, while the influence of public relations material and recycled content from other media outlets is increasing.

The position and role of the Finnish News Agency (STT) as a national news provider has fundamentally changed since the 2011 MDM report was published. At least 31 media companies still jointly own the agency; however, now the Sanoma Group owns a majority of the shares at 74.42 per cent. Although public broadcaster Yle has returned to be an STT subscriber after a parliamentary decision, it still runs an in-house news service for its own purposes. The two smaller news services – UP News Service, with social democratic roots, as well as Startel, owned by the Sanoma Group – still exist. The leading news media also follow the main international news agencies, like earlier.

In our interviews, several editors-in-chief of leading national news media organisations shared that they were now using less STT content or were using it mainly for more limited purposes than earlier. Meanwhile, the tabloid newspaper *Iltalehti* stopped using STT completely, arguing that the quality of journalistic work has since improved due to more engaging reporters:

Iltalehti does not use STT anymore. They realised the telegram-like information provided was generally on a very basic level. *Iltalehti* performs better on its own, and leaving STT has not been detrimental in any way. Now, the reporters have to work more hands-on and find their own information, thereby improving the standards of reporting on the whole. (IL journalist, 2020)

The reduced interest in using STT is a tendency that already existed even a decade back, and perhaps reached a visible peak by 2015, when *HS* also quit its subscription to STT text services. After Sanoma Group acquired the majority of STT shares in 2018, *HS* returned to subscribe to the service; however, it is now using it as an alarm system rather than a content provider:

Yes, we have several international news providers and STT is used within Finland. HS also works on the serving end of syndication, providing material for others. Sanoma owns a large part of STT, which needs to exist, so Sanoma keeps it alive, not so much for profit but for the importance of having it around (HS editor-in-chief, 2020).

The use of STT content has decreased also because of growing newspaper owner-ship concentration and increasing content interchange between newspapers of the same owner (Pernu, 2020). This tendency, as well as the increasing influence of public relations material, was well recognised already at the time of the 2011 MDM report. However, resources for in-house newsgathering have since been continuously decreasing. The problem is now becoming more serious, as Finnish online journalists are no longer able to use reliable sourcing practices and meet the expectations of young adults, who expect their online news to be always verified (Manninen, 2019).

In recent years, the network of national and foreign correspondents of leading news media organisations has been shrinking. For example, *HS* had six domestic offices in 2009, and now has only four. STT had two regional domestic offices in 2015, but now it relies just on a network of freelance correspondents. STT has also withdrawn its foreign correspondents from everywhere except Brussels. MTV3 has cut down on both the number of regional offices as well as foreign correspondents – currently, it has four foreign correspondents. Meanwhile, *HS* has a total of eight foreign correspondents, and one of those positions is rotated from one country to another on an annual basis (Hoikkala, 2014). However, Yle's network of 25 domestic offices and nine permanent foreign correspondents remains the same despite the cuts in its annual budget (Yle, 2014).

In 2020, HS started to publish selected stories translated from The Wall Street Journal. The purpose of this was to complement the reporting on American presidential elections. The longstanding trend of increasing editorial cooperation and syndication within Finnish newspaper chains has become even more visible after Sanoma Group bought all Alma Media regional newspapers in February 2020. HS has been publishing a growing number of Aamulehti content, and

vice versa. This reorganisation also meant that *Aamulehti* and *Satakunnan Kansa* were going to end their cooperation with Lännen Media, a joint content production company of eleven regional newspapers.

The latest phenomenon is probably content cooperation between independent local and national news outlets. *HS* has been publishing local content from *Kauhajoki-lehti*, while *Ylä-Satakunta* will start publishing Yle content on its website. A recent study on the diversity of media content provision described the Finnish development to be quite alarming, as the number of media outlets is decreasing at the same time media concentration of outlets is increasing (Ala-Fossi et al., 2020).

(F4) Internal rules for practice of newsroom democracy

2 POINTS

Finnish journalists seem to have a relatively high level of autonomy in their daily work, but any formal structures or practices supporting internal democracy are not common.

In 2011 2 points

The journalistic culture, as well as the organisational structures and practices in leading news media organisations in Finland has remained the same as in the early 2010s, when the previous report was published. The editors-in-chief and experts emphasised the individual autonomy of journalists in choosing and framing news topics.

The ethical rules of journalism in Finland have been collected into Guidelines for Journalists published by the CMM, which is a self-regulatory organisation of the Finnish publishers and journalists. Most respondents also referred to these guidelines, stating, "The journalist is entitled to refuse assignments that conflict with the law, his/her personal convictions or good journalistic practice" (CMM, 2014).

As in the 2011 report (Karppinen et al., 2011), impartiality and autonomy are on a general level documented in codes of ethics and editorial guidelines. In practice, they are ensured more effectively through journalistic culture and professional norms, rather than written guidelines. A newsroom council does not have a formal status in any of the selected media outlets, and the board of directors or the management normally appoints editors-in-chief and other leading positions, without any requirement to incorporate journalists' input. However, if there is serious lack of confidence between the editor-in-chief and the journalists, it is possible that the journalists may march out and make their opinion heard in that way:

Reporters cannot affect the selection of an editor-in-chief. Should there be a really incompetent editor-in-chief, if necessary, they can march out to demand having him relegated from his position. (IL journalist, 2020)

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

The autonomy and independence of the newsroom remains a central value in Finnish journalistic culture.

The principle of journalistic autonomy is a cornerstone of the ethical guidelines for journalists by CMM. Following that, rule 2 requires that "decisions concerning the content of media must be made in accordance with journalistic principles. The power to make such decisions must not, under any circumstances, be surrendered to any party outside the editorial office" (CMM, 2014). The current wording of this rule, from 2014, is even stricter than the previous one from 2005. As it was a decade ago (Karppinen et al., 2011), all the leading news media organisations are committed to these guidelines, and according to the interviews with the UJF as well as editors-in-chief, the principle of journalistic autonomy continues to enjoy high esteem not only among journalists, but even among the publishers and owners of media companies.

In the previous MDM report, there was some evidence of a growing tendency to combine the posts of the editors-in-chief and publishers. However, it seems that the experiment did not turn out to be successful, as all the papers in the sample that tried this kind of arrangement have abandoned it by now. Already in 2013, the board of Sanoma Corporation nominated a new editor-in-chief for *HS*, who was allowed to concentrate on journalistic decisions. Meanwhile, *Borgåbladet* was merged with Ö*stra Nyland* in 2015, and the editor-in-chief of the new paper Ö*stnyland* was also the head of news, but no longer the publisher. Since 2018, *Iltalehti* has had a separate publisher and two editors-in-chief: one for news and another for feature content.

The practical organisation of the separation of the newsroom from the owner-ship largely depends on the type of media organisation in question. In some cases, such as the commercial broadcaster MTV3, the separation is explicitly mentioned in the company values or other formal documents. In many cases, however, there are no formal rules on the separation of the newsroom from the management, outside of the general professional code of ethics (as was the case in 2011; see Karppinen et al., 2011).

There is usually no formal representation of journalists on the board of media companies – of the sample media corporations, none except Yle had journalists on the board. Although the board nominates the editor-in-chief without any formal input from journalists, in practice, the editor-in-chief must have the confidence of the journalists to be successful. Advertising departments are generally strictly separated from the newsroom and do not interfere with journalistic work. However, in case of the local newspaper examined, the small number of interviewees made it evident that there was contact and some cooperation between the newsroom and the advertising department:

The advertising sales staff sits in the same room, so there are communications going on. The advertisers might say, "There is a new car sale store opening soon" (... hoping we would cover it). There is a small collaboration going across the borders but no pressure, it's informal. I have no memory of advertisers influencing the newsroom. (ON editor-in-chief, 2020)

The independence of the state-owned public service media Yle has been a permanently contested question in terms of both organisational structure and individual news items. This has been happening since at least 1948, when a new law, "Lex Jahvetti", was introduced that transferred the company from de-facto government control to parliamentary control. The independence from the government and political parties was emphasised on all levels of the legal definitions, company values, and internal editorial guidelines of Yle. This system was put to the test in 2015, when a newly elected right-wing government wanted to reconsider the funding and remit of Yle, which had been agreed in the parliament only two years earlier (Karppinen & Ala-Fossi, 2017). After a new parliamentary working group (Satonen group) was able to reach a new consensus in 2016, most of the political pressure on Yle was relieved. However, later in the same year, Prime Minister Juha Sipilä ended up in a dispute with Yle News over a single news story, which was then scaled back (see Indicator F6 – Company rules against *external* influence on newsroom/editorial staff). As a result, CMM gave Yle a reprimand for breaking the code of conduct for journalists in Finland (Yle, 2017).

(F6) Company rules against external influence on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

Direct influence by external parties on newsroom decisions is still not seen as a major problem.

Similar to the previous study in 2011, all editors-in-chief interviewed insisted that journalistic work was not interfered with by individual advertisers or any other external parties. However, this was by no means because there would not be any attempts to influence journalistic decisions, but because the firewalls were in place and external influence was determinedly rejected. The editors-in-chief may feel pressure, but they gave assurances that it stopped there. According to representatives of leading commercial news media houses, in general, both advertisers and politicians know the extent to which they can influence a newsroom. There have been some difficult cases in the past, but both the times and people are not the same as before.

The funding system of public service broadcaster Yle was reformed in 2013 by replacing the licence-fee system with a special public broadcasting tax. In

addition to creating a system with lower fees and a larger pool of payers, the designers of the reform attempted to further insulate Yle from the state, financially speaking. Introducing an automatic annual index raise to keep the level of income steady, instead of annual government proposals for parliament decisions, was expected to achieve this. In 2014, the tax model turned out to be at least as vulnerable to budget pressures as the licence fee, as the index raise was granted only once in the first year (Karppinen & Ala-Fossi, 2017).

This ongoing struggle over the fair level of Yle financing was the context of the so-called *Sipilägate* in late 2016, when Yle published a news story about how a contract was awarded by a state-owned mining company to one owned by relatives of Prime Minister Juha Sipilä. This bothered him so much that he sent a series of oppressive emails to both the journalist who had written the story as well as to the editor-in-chief of *Yle News*, Atte Jääskeläinen. Very soon, three journalists resigned from Yle because they felt their editor-in-chief had let them down under pressure from the prime minister (Koivunen, 2017).

Jääskeläinen retained his position through this crisis, but he was forced to resign about five months later, after another public row over a relationship of Yle journalism and CMM. Even the CEO of Yle, Lauri Kivinen, renounced his position prematurely in 2018. *Sipilägate* compelled Yle to create more clear internal rules and processes to improve integrity of journalistic work. Additional protection against external pressure was considered necessary, as something like this could potentially occur again. According to the new editor-in-chief of *Yle News*, it also seems to have taught Finnish politicians a lesson about how to not interfere in Yle journalism.

The Administrative Council are a colourful group and they try to influence the news production at times but the firewalls hold strong [...] there was a long time of silence after Sipilägate, when it seemed nobody [of the politicians] had dared to comment [on their work] with a risk of feeling that they were leaning on the editor. Of course, while the editor-in-chief should be given feedback where necessary, it should be directed to him, *not* directly to the reporters. Nowadays the situation has normalised. (Yle editor-in-chief, 2020)

(F7) Procedures on news selection and news processing 2 POINTS Despite radical reforms of strategy for news production and distribution, the 2 POINTS

Despite radical reforms of strategy for news production and distribution, the ways of processing and selecting the news have not yet been revolutionised.

Over the past decade, the leading Finnish news media organisations have radically reformed their strategic thinking about news production and distribution. Most newspapers, including *HS*, have abandoned broadsheet format for tab-

loid format; traditional broadcasters like Yle and MTV3 have invested more in online services instead of television and radio; and after experiments with specialised production groups, practically everybody has adopted an overall strategy to put digital first – or mobile first. The printed edition of the newspaper or the main evening news broadcast on television or radio are no longer the main platforms for news, but rather by-products of continuous daily news production for online and mobile audiences.

In this context, however, it seems that actual processes of news selection and news processing in leading news media organisations in Finland has changed much less than one would expect. Most respondents emphasised the importance of the traditional "morning meeting" for news selection (or in some cases, two morning meetings, with the first held among the heads of all departments and the second in each department separately). Longer, more demanding or labour-intensive stories must be more carefully planned beforehand, but shorter stories are usually produced and published as quickly as possible. There is also no longer only one daily deadline. Although the plans for the day are made in the morning, the actual outcome is usually a result of continuous negotiations between journalists in the newsroom.

The 2011 MDM study pointed out that Finnish media organisations had already adopted some sort of stylebook, or they were preparing one. However, it seems that most of them have remained for internal use only. Evidently, the STT and public broadcasting company Yle are the only ones with comprehensive stylebooks and editorial guidelines; they are also publicly available online. Yle has also updated its own ethical guidelines for news and content production twice after *Sipilägate* (2017 and 2019) and has additionally created a special "concept bible" to help the introduction of audience segmentation into Yle online news journalism (Hokka, 2019) – but this document has not yet been published.

(F8) Rules and practices on internal gender equality 2 POINTS

Gender equality is protected by law and women have equal opportunities to proceed and develop their careers as journalists. However, the division of work tends to be very stereotypical in practice.

In 1906, the Grand Duchy of Finland was the first country in Europe to grant women the right to vote in national elections. Nearly 80 years later, a special legislation on equality between women and men (609/1986) came into force. Despite that, there is a still lot of work to be done towards perfect gender equality in Finland.

Journalism has been a profession dominated by males for a long time. Even the UJF was called the Union of Finnish Newspapermen until 1993; however,

five years later in 1998, the majority of the union members were female. Female participation in the trade is increasing, as over 70 per cent of student members are women (Journalists Union, 2020). The theme of gender equality among journalists became increasingly stronger in the 1980s and 1990s. However, gender-specific practices of the trade were not properly challenged at the time, and that is why the discussion continues even today (Kurvinen, 2019).

The editors-in-chief of leading news media organisations – two of them female– noticed and highlighted the significant increase of the number of female journalists in the country, especially among newcomers. From a management perspective, gender equality in Finnish newsrooms had been taken care of. Salaries and working conditions in the same field were similar for everybody, and opportunities to build one's career were described as equal. However, trade union representative pointed out that on an average, female journalists make less money than male journalists. This may be partly because young journalists tend to have lower salaries than older ones, but also because of stereotypical divisions of work:

On a larger scope, things are quite equal, the situation is comparable to the Finnish society in general. Then again, whereas for normal women 1 euro is 82 cents, for female journalists it's 96 cents. But still, when there is an interesting story about how the older generation of leaders tended to send male reporters to do the job because the men were considered better reporters. Other stereotypical divisions also exist, for example, women do stories on interior design while men cover sports, typically. There is still a lot of work to be done in this area, even though the challenges are connected to different age groups among the leaders, [especially] the older aren't equally equal in their leadership. (UJF president, 2020)

(F9) Gender equality in media content

2 POINTS

The leading Finnish news media organisations strive towards increased gender equality in media content online by using a tracking system. However, challenges remain, as the surrounding society is truly not equal.

The leading newspaper in Finland, HS, has monitored the gender balance of its website content since late 2017 (Yläjärvi & Ubaud, 2018). Public service media company Yle followed its example in January 2018, as part of their internal gender equality programme. In 2020, 17 newspapers as well as Yle News in Finnish and Swedish are using the same gender equality tracker developed by the Swedish company, Prognosis.

For the past 150 years, the share of female interviewees in Finnish media has been close to one-third (Pettersson, 2018). HS has promised twice (in 2014)

and 2018) to increase the number of female voices in their publication, but without lasting results. In 2018, Yle was able to increase the share of female interviewees from 30 per cent to 43 per cent, but challenges remain for reasons like the Finnish political elite being predominantly male (Erho, 2019).

In 2007, the Institute of Languages of Finland recommended the use of gender-neutral expressions in the media. Ten years later, in September 2017, *Aamulehti* announced that it would replace traditional gender-specific job titles, such as chairman or fireman, with gender-neutral titles. The reception to all this has been mixed. *Aamulehti* received an award from the Council for Gender Equality and the National Council of Women of Finland; however, no other newspaper has publicly followed their example. It has, additionally, been criticised for using newly coined gender-neutral job titles instead of official titles, some of which have a specific legal basis.

(F10) Misinformation and digital platforms (alias social media)

2 POINTS

The leading Finnish news media rely primarily on internal processes and traditional practices of good journalism as defensive weapons against misinformation. They have also invested in improving the media literacy of their audiences.

Finnish news media experienced an exceptional period of hybrid information warfare in the aftermath of the annexation of Crimea by the Russian Federation. Fake social media accounts had been spreading misinformation supporting Vladimir Putin's government and the state of Russia already for a while. Following that, in 2014, right-wing activist Ilja Janitskin established a new platform, *MV-lehti*, an online newspaper that published hate speech and propaganda in Finnish, which gained some popularity among people supporting Russia, as well as among right-wing extremists. In 2018, Ilja Janitskin was finally arrested and sentenced to jail on 16 different criminal counts, including harassment and aggravated defamation of Yle journalist Jessika Aro (Nousiainen, 2019).

At the same time in 2014, a small group of Finnish journalists and a Finnish transparency NGO called Avoin yhteiskunta [Open society] created the Faktabaari [FactBar] fact-checking service to meet the increasing need of preventing distribution of misinformation. Faktabaari started by checking claims made in the European election debate and ran a fact-checking campaign during the general elections in 2015. However, among the leading Finnish news media organisations, only *HS* identified it as an important partner for collaboration and as an instrument for producing high-quality journalism.

Since 2015, public service media Yle has been offering a special series of online stories in Finnish, aimed at revealing different cases of misinformation

under a common title Valheenpaljastaja [Lie detector] (Yle, n.d.). In addition, Yle has also invested in new ways of increasing audience awareness and understanding of troll tactics by developing an online game that lets you play the role of a hateful troll. Trollitehdas [Troll factory] was first released in Finnish in May 2019, and it turned out to be so popular that an international version in English was released only a few months later (Yle, n.d.).

Practically all other editors-in-chief and journalists interviewed for this study stressed the importance of internal processes, guidelines, and rules as well as traditional practices and conventions of good journalism in fact-checking. As mentioned earlier, CMM has a central role in creating, maintaining, and controlling the obedience of the ethical rules for producing good journalism as a self-regulatory organisation of the media. A media outlet in Finland not committed to the ethical rules of CMM is still a rare exception, but in 2018, the members of the council started to use a special emblem of membership as a sign of "responsible journalism".

(F11) Protection of journalists against (online) harassment 3 POINTS

All the largest news media organisations in Finland have their own internal protocols and guidelines for protecting their journalists against external interference and harassment. Meanwhile, freelancers may get help from a special fund. Online harassment is also going to be criminalised.

Despite top rankings in the World Press Freedom Index by Reporters Without Borders, ever since it was established in 2002, external interference of journalists is by no means a new phenomenon in Finland. However, online harassment and intimidation of journalists covering the aftermath of the so-called refugee crisis and immigration became a public concern in 2016, after several cases had been reported in the media. One exceptional case was the knife assault on Turku Market Square in March 2018, as described by the editor-in-chief of *Turun Sanomat*:

Moderation is necessary [online]. A few years ago when the Turku knife assault happened, it was a huge effort as there were 500–1000 daily posts that needed to be handled. Two people did it on the side of their main task. For the past two years, the commentators have been bound to first register themselves. That helped the situation. Now, the amount of comments can be handled well [...] After the knife attack, there were 200 hate mails in one month, mostly from the "racists" but also from the "suvakit" [anti-racists]. If our reporter is harassed, he does not hesitate to mention it. But there is a serious risk for self-censorship, where a reporter does not have the strength to write a story because of the expected shit-storm that will follow. (TS editor-in-chief, 2020)

Later in the same year, there was also a very exceptional conflict between the prime minister of Finland and public broadcaster Yle (see Indicators F5 & F6 – Company rules against *internal* and *external* influence on newsroom/editorial staff) (Hiltunen, 2018).

A study conducted in 2017 revealed that although severe interference was rare, low-level external interference of journalists was more common than expected. For example, 60 per cent of respondents had experienced verbal abuse in their work, and 15 per cent faced it regularly (Hiltunen, 2018). According to the editors-in-chief of a leading news media organisation, both male and female journalists have been targeted online; however, female reporters have been harassed more often and more seriously.

By now, the largest news media houses in Finland have created their own internal protocols and guidelines for protecting their journalists against external interference and harassment. All of them are also ready to take legal action and transfer the most serious cases to the police. Small and local media do not necessarily have their own guidelines yet, but they can utilise the public version of Yle guidelines for safer interaction released in early 2020 (Harvia & Naskali, 2020).

At the moment, online shaming, harassment, or illegal threats are not crimes as such, but the Finnish government is going to change the situation by reforming the existing legislation. This would provide better protection not only for the police, prosecutors, and judges, but also nurses, paramedics, and professional journalists (see Indicator C2 – Independence of the news media from powerholders).

Besides company-specific policies and practices for protecting permanently employed journalists from harassment, a special Support Fund of Journalists was established in 2019 to help Finnish freelancers, in particular. During its first year of operation, the fund altogether disbursed EUR 41,000 as four support grants covering, for example, loss of income, moving expenses, and crisis therapy (Jokes, 2020).

Dimension: Equality / Interest mediation (E)

(E1) Media ownership concentration national level

2 POINTS

2 POINTS

The national media market is relatively concentrated, with only a handful of companies dividing the market in each sector. Since 2011, mergers and acquisitions within the industry have continued, but the overall concentration ratios have remained stable.

As it was a decade ago (Karppinen et al., 2011), Finland does not have any specific regulation of media ownership concentration, aside from general

competition rules. The overall media market is relatively concentrated, with a handful of mostly domestic groups controlling several outlets across media sectors, although no single actor controls any sector.

The Sanoma Group continues to be by far the biggest media company in Finland, with a presence in all major media sectors. Since 2018, Sanoma is also the majority stake owner of the Finnish News Agency STT. The public broadcasting company Yle is the second-biggest media company, with notable market shares in television (46%), radio (50%), and online news (third popular online news site).

The position of *HS* as the only (de facto) national, quality newspaper is dominant in practice with no real rivals. The evening tabloid market is shared between two competing national tabloids – *Ilta-Sanomat* and *Iltalehti*. All three are also among the most popular online news sites in Finland (see Table 4 and Indicator F2 – Patterns of news media use). The consolidation of regional and local newspaper ownership into chains has also continued.

In television, the number of commercial channels has significantly increased throughout the 2010s, but the viewing share of the channels controlled by the three biggest companies has remained above 80 per cent. In radio, the market has further concentrated with two major commercial companies (Bauer Media and Sanoma), together with Yle controlling 89 per cent of the market share.

The basic data on media ownership are transparent for the most part. Most of the large media companies are publicly traded, and major changes in ownership are also reported in the media. According to a recent review of Finnish media policy, however, ownership information is not always readily accessible to audiences, and it may be difficult for citizens to gain a full picture of the cross-interests and ownership structures within the industry (Ala-Fossi et al., 2018: 180). The EU Media Pluralism Monitor has also identified media ownership transparency as a medium or high risk for media pluralism in Finland (Manninen, 2018), mainly because Finnish legislation does not set specific transparency requirements for media companies.

The market shares of the top three companies (CR3) have been calculated on the basis of net sales (newspapers) or share of total viewing and listening (television and radio). As indicated in Table 4, the market share of the top three companies is relatively high in almost all sectors of the media, indicating a moderately concentrated, but not monopolistic, market structure.

Sector	Top 3 companies 2020	Market share (%) 2020	CR3 (%) 2010	
Television	Yle, MTV3, Nelonen/Sanoma	82	90	
Newspapers	Keskisuomalainen, Sanoma, Alma Media	65	50	
Radio	Yle, Bauer Media, Sanoma	89	71	

 Table 4
 Market share of top three companies in different media sectors (CR3)

Source: Statistics Finland, 2020c, 2020e, 2020f

In 2020, Sanoma bought the regional newspapers of Alma Media, further strengthening the position of Sanoma and Keskisuomalainen, which owns around 80 regional and local newspapers, as the two largest newspaper publishers.

(E2) Media ownership concentration regional (local) level 1 POINT

In 2011 1 POINT

Apart from newspapers, the leading news media houses in Finland are more nationally oriented. There are no significant regional or local television channels. Dominant regional newspapers generally face no direct competition in their own market area.

The number of regional and local newspaper titles in Finland is high in proportion to its population, with over 200 titles in total. However, as a result of mergers and closures, the number of titles has decreased by around 13 per cent in the last decade (Ala-Fossi et al., 2020: 24). Ownership has further consolidated with a large proportion of the titles now owned by national publishing chains, specifically Sanoma and Keskisuomalainen. In 2020, Sanoma acquired the regional newspapers of the third-largest publisher, Alma Media, further consolidating the market position of these two companies.

Almost all regions are served by one dominant regional newspaper, with no direct competition in their own market area. Despite the high number of regional and local newspapers published per capita, the market for regional media is relatively concentrated. The competition these regional newspapers face is against the nationwide newspaper *HS* and other national news outlets, including online services such as the regional news service of public broadcaster Yle, which has been criticised by the commercial media industry for their impact on commercial regional news media.

Television channels in Finland are almost exclusively national, and although small-scale commercial or community-regional and local channels exist, they

have a marginal market share. Yle publishes regional news online for 19 regions, broadcasts daily regional news broadcasts on national television for ten areas, and regional programming in Finnish, Swedish, and Sámi language on the frequencies of Radio Suomi.

There are 53 regional or local commercial radio stations in Finland (see Indicator F1 – Geographic distribution of news media availability). In larger markets, such as the Helsinki region, there is competition between a wide range of radio channels, whereas more remote areas have less options. The field of local radio stations has also seen continued consolidation into national chains (Bauer Media, Sanoma) in the last decade, reducing the provision of genuinely local programming. In addition, a few non-profit, public access radio channels also operate in Finland with very limited resources.

(E3) Diversity of news formats

3 POINTS

In 2011 3 points

Most major news formats are widely available in Finland, with new formats being generated online by both legacy and online-only outlets.

A variety of news formats are widely available across the media market, ranging from legacy newspapers and broadcast media to various online and mobile news applications.

There are no Finnish 24-hour news channels, but Yle and MTV3 broadcast news bulletins on their main channels throughout the day. In the last decade, one of the major commercial channels, Nelonen, as well as other commercial channels, have ceased broadcasting their own news, leaving MTV3 as the only commercial broadcaster with major news provision. This can be seen as decreasing the diversity of broadcast news provision. Other traditional news formats, such as party-affiliated newspapers, have also notably declined in importance, with resources being directed to online and social media.

On the other hand, the largest news media organisations with most resources, such as *HS*, have heavily invested in their digital services, which increasingly make use of new formats such as data journalism, video, podcasts, visualisations, and other forms of news presentation. The public broadcaster Yle has also been considered ahead of most European public service broadcasters in terms of adapting its provision to the digital environment and their use of mobile and social media platforms to deliver public service content (Sehl et al., 2016; see also Karppinen & Ala-Fossi, 2017).

In addition to the traditional news providers, a handful of new online-only outlets, such as *Uusi Suomi*, *Mustread*, *Long Play*, and *Rapport*, have also attempted to develop new formats of news delivery, although their resources and reach remain much lower than major legacy news companies.

(E4) Minority/Alternative media

2 POINTS

In 2011 2 POINTS

The supply of media content in Swedish and Sámi languages is extensive in relation to the size of the population in Finland, but other minority and alternative media organisations are limited.

Compared with most other European countries, Finland remains ethnically homogenous. Although immigration to Finland has increased in the last ten years, the proportion of foreign-born population (7%) remains below the EU average. In addition to the official languages Finnish (native language for 87% of the population) and Swedish (5%), the constitution of Finland specifically mentions Sámi, Romani, and users of Finnish sign language (alongside a reference to "other groups") as minorities with a right to "maintain and develop their own language and culture".

With its own established media institutions, it can be stated that the Swedish-language media in Finland constitutes an institutionally complete media system (Moring & Husband, 2007), including several daily regional and local newspapers, periodicals, and significant public service programming in Swedish on television and radio. In 2017, however, the public broadcaster Yle's dedicated channel for Swedish-language programming was merged with another channel.

Yle is obliged to provide services also in Sámi, Romani, sign language, and, when applicable, other languages used in Finland. The supply of products in the Sámi language includes television news broadcasts (*Oddasat*), a regional radio channel (*Yle* Sámi Radio), and an online news portal. Yle also has a multilingual radio channel and provides news portals in English and Russian (Ministry of Transport and Communications, 2019).

The Ministry of Education allocates public subsidies to minority-language media. Some EUR 500,000 is annually allocated to minority-language newspapers, magazines, and online services in Swedish, Sámi, Romani, or Karelian languages. Overall, while media services for recognised "old minorities" in Finland are relatively extensive, only a few media services are available for immigrants in Finland. The representation of ethnic minorities also remains marginal in the workforce of mainstream media houses (as was the case a decade ago; see Karppinen et al., 2011).

Arts Promotion Centre Finland (Taike) also allocates subsidies (around EUR 1 million annually) to cultural and opinion journals to "maintain diverse public discussion about culture, science, art or religious life". Non-profit actors have a presence in print media and magazines, but in television and radio, alternative media outlets remain few and they receive little public support. Only two genuine public access and community radio stations exist locally, as non-profit broadcast media houses have increasingly moved online. Alternative media outlets of civil society organisations and other non-profit actors are thus increasingly confined to the Internet.

(E5) Affordable public and private news media

3 POINTS In 2011

3 POINTS

The prices for media services in relation to household income remain affordable.

Finland is a comparatively rich country characterised by a generally high cost of living. In relation to the average household income, the prices of mass media are generally not exceptionally high. On average, Finnish households spent EUR 946 (2.5% of total consumption expenditure) on mass media in 2016 (down from 4.1% one decade earlier). However, this excluded telecommunication, which accounted for an additional 2.3 per cent of total consumption (Statistics Finland, 2020d). Statistics Finland also published information on media consumption by household income and education level. It showed that the percentage of income used on media services is more or less the same in all income and education groups.

The annual subscriptions to daily newspapers are generally between EUR 300–400 (up from the average of EUR 225 in 2010), while an annual subscription to the largest newspaper *HS* (print and digital, without discount) is currently EUR 469. Newspapers also offer various discounts for students, weekend-only subscriptions, and other combinations of print and online services. Most newspapers have introduced a paywall in the last ten years, decreasing the amount of free content online; however, less than one-fifth of the adult population paid for online news in 2019 (Newman et al., 2019). The availability of free newspapers distributed in public transportation has also declined in the last ten years. The free daily *Metro* that was distributed in the Helsinki region public transportation since 1999, for example, ceased publication in 2020, partly due to the Covid-19 disruptions.

A special public broadcasting tax, which replaced the television licence fee in 2013, funds the public service broadcasting in Finland. In contrast to the old licence fee, the tax is income-adjusted. As a result, individuals pay an earmarked tax up to a maximum of EUR 163 per year (in 2020), with those earning less than EUR 14,000 exempt from the tax. In comparison, the annual television fee in 2010 was EUR 231 per household. Meanwhile, all Yle services are free of charge, available to all, and funded entirely by the tax, with no advertising or sponsoring allowed.

Access to broadband is designated as a universal service in Finland, which means that all households across Finland have the legal right to a reasonably priced connection at a minimum speed to be periodically reviewed (will be raised to five megabits per second in 2021; Ministry of Transport and Communications, 2021). According to the ICT industry association Federation for Communications and Teleinformatics, the price of broadband access has slightly decreased in recent years, with 10 megabits per second fixed connections costing EUR 25, and 100 megabits per second around EUR 50, on average (Ficom, 2020). In

the European Commission's (2019a, 2019b) comparison of broadband prices in Europe, prices for both fixed and mobile broadband bundles in Finland are below the European average.

(E6) Content monitoring instruments

1 POINT

1 POINT

There have been some content monitoring initiatives by the media houses themselves, universities, and public bodies. However, they are mostly irregular and non-systematic. In some regards, the data basis for systematic monitoring has eroded in recent years.

A range of actors – including Statistics Finland, regulatory authorities, media industry associations, and commercial monitoring agencies – offer mostly structural data on media structures, supply, and use. Instruments to monitor news media content, and issues such as neutrality and diversity, however, are more fragmented and ad hoc.

The 2011 MDM report on Finland noted several attempts to develop more systematic instruments for media content monitoring in Finland. Since then, however, many of these initiatives have been discontinued. The Annual Monitoring of News Media, developed by The Journalism Research and Development Centre of the University of Tampere to survey news media output between 2006 and 2012, for example, was discontinued. Various research projects have developed tools for monitoring reporting on individual issues, such as ethnicity and racism in the media, but they have not developed into organised, permanent monitoring instruments.

The Ministry of Transport and Communications published an annual report on Finnish television programming focused on quantitative analysis of the television output and diversity, based on different programme types until 2015, which has also been discontinued. In 2018, the Ministry commissioned a report on the state of Finnish media and communication policy, which proposed a range of metrics to improve the knowledge base of media policy-making (AlaFossi et al., 2018); most of these metrics, however, have not been systematically implemented.

Apart from independent bodies, media organisations themselves do some monitoring. For example, a number of media organisations are using a gender equality tracker to monitor and publicise the balance between men and women as subjects and sources in their news (see also Indicator F9 – Gender equality in media content). The public broadcaster Yle also employs various instruments of content monitoring regarding its mandated obligations.

In addition, discussions on the content of journalism take place in academic studies, professional journals, and of course social media, but for the most part,

these do not constitute continuous monitoring instruments. A number of commercial media monitoring services also keep track of reporting on specific issues for subscribing clients, but their results are generally not publicly available.

(E7) Code of ethics at the national level

3 POINTS

In 2011 3 points

All leading news media organisations in Finland have committed to the common code of ethics, overseen by CMM.

CMM is a national self-regulating committee established in 1968 by the publishers' and journalists' unions whose mandate is to interpret good professional practice and defend freedom of speech and publication. Anyone may file a complaint about a breach of good professional practice in the media, and if CMM establishes a violation, it issues a notice. All organisations signed under CMM's charter are obliged to immediately publish this notice – practically speaking, all Finnish news media organisations are a part of that charter. CMM can also issue general policy statements.

Despite periodic criticism directed at the effectiveness of the existing self-regulatory practices, the system is strongly established and remains well-known among journalists. According to the interviews, the status of CMM's Guidelines for Journalists continues to be strong. Editors-in-chief, journalists, as well as both publishers' and journalists' associations uniformly attested that the code of ethics is well known and followed within the profession. According to the director of Finnmedia, the significance of the national guidelines has been further strengthened in recent years, and the model is often seen as exemplary in other countries.

On the whole, the CMM journalistic rules are followed closely and their importance has grown. The rules are the most important factor when deciding which media producers are to be considered "real news media". The Finnish rules are exemplary and are being followed as a model also by other countries. (Finnmedia CEO, 2020)

In addition to CMM, UJF also stated that it has a special responsibility to defend journalism and its ethical rules. Alongside its member associations, UJF organises courses and other activities to disseminate good journalistic practices. It also publishes the monthly professional journal *Journalisti*, which sustains debate on journalistic practices and ethics.

Figure 1 Number of annual complaints made to the Finnish Council of Mass Media, 2010–2020

Source: CMM, 2020

(E8) Level of self-regulation

3 POINTS
IN 2011
2 POINTS

The common code of ethics overseen by CMM is the backbone for self-regulation in all leading news media organisations in Finland. Beyond these national guidelines, the existence of additional internal guidelines and self-regulation instruments varies from one organisation to another.

As noted above, all media organisations are committed to following the guidelines published by CMM. Most news media also have their own internal guidelines in one form or another, usually used to complement the guidelines of journalists and to give more detailed instructions on the practices of the media organisation in question. A number of interviewees noted that they have internal journalistic rules, handbooks, or stylebooks that complement and specify the general national rules (see Indicator F4 – Internal rules for practice of newsroom democracy). The right to reply and the publication of corrections are guaranteed at the level of both national code of ethics and media law, as confirmed by the UJF president:

Inhouse rules exist widely. Usually, they are more pragmatic rules on how to interpret the CMM rules, or maybe even more rigid. [...] It's a good thing that there are house specific rules because different topics bring different kinds of issues and needs. (UJF president, 2020)

Most media organisations also have more general mission statements, which almost invariably refer to democratic values, independence, balance, pluralism, and so forth. Some individual media organisations in Finland have experimented with the use of an independent Ombudsperson in the past, but the practice has

not become adopted by other leading news organisations. Instead, the public broadcaster Yle has a position called the head of journalistic standards and ethics, whose task is to support journalists and oversee the implementation of ethical standards.

In 2018, the leading news media houses launched a campaign where those who follow the CMM guidelines would display a "responsible journalism" logo to distinguish them from blogs and other non-journalistic information sources (see Indicator F4 – Internal rules for practice of newsroom democracy).

Most media houses in the sample also claimed to exercise some organised form or process of self-criticism. CMM resolutions are typically discussed together with the journalists involved, and sometimes with the whole newsroom. Professional journals published by the publishers' and journalists' associations also include debate on media ethics.

(E9) Participation

3 POINTS

In 2011 2 POINTS

News media has generally shifted from anonymous and open commenting to moderated comments sections. Social media, too, has increased dialogue between journalists and audiences.

The right to reply and the publication of corrections are guaranteed at levels of both the national code of ethics and that of media law. Most news media also provide spaces for commenting on news pieces online and in social media, although many outlets have recently begun to move away from unmoderated and anonymous comments sections in order to avoid harassment and other objectionable content. User-generated content, such as photographs, video, and social media content, is also used, but this shows a lot of variance between different types of news media. The Internet sites of news media typically also contain surveys, feedback features, and other interactive content for viewers. According to the interviewees, the early enthusiasm for user-generated content has dissipated and been replaced by the use of social media. This has been both as a news source and as a platform for audience feedback.

Most of the interviewees expressed ambivalence towards online commenting. Comments are generally encouraged, but it was noted by multiple interviewees that open online commenting spaces can potentially become dominated by trolls as well as extremist views:

UGC today consists mostly of commentaries on social media. The feedback comes from a small group. Those who have the time to comment do it often. During the last five years the True Finns policy seems to have increasingly taken a trolling role. Often the third comment on any news already relates to immigration. This leads to many refraining from commenting. (*IL* journalist, 2020)

At Yle, for example, almost all online news items were previously open for comments, which resulted in chaotic discussions and an overabundance of improper behaviour. In 2019, an automatic moderating algorithm was adopted, which was still unsatisfactory. Since 2020, human editors in cooperation moderate discussions with a service provided by the STT. Other new media reports similar experiments. According to the interviews, and compared with a decade ago, a better balance now seems to have been found between completely open forums and moderated discussions.

According to one editor-in-chief, it is obvious that "the citizens affect the contents of the paper more than they did ten years ago". The significance of social media as a forum of dialogue between journalists and audiences has also increased in this time. According to one interviewee, "What the paying customer wants is openness in social media, answers to questions and dialogue, and not so much that they might produce content actively".

The local newspaper Östnyland stood out from the larger media organisations in our sample. According to the interviews, their newsroom was easy to approach, as people can just walk through the door or suggest ideas in random meetings around town. Larger media organisations, and the public broadcaster Yle in particular, tended to organise special events and Q&A sessions to interact with audiences. Yle has also founded a new "Head of Audience Dialogue" position to promote participation and audience relations.

(E10) Rules and practices on internal pluralism

2 POINTS

In 2011 2 POINTS

Internal pluralism is generally encouraged and valued, but aside from general professional guidelines and values, there are few formal rules.

None of the media organisations in the sample were officially associated with a particular party or an ideology, but like almost all other leading news media, they subscribe to the ideals of independence, balance, and pluralism. Practically all interviewees recognised the importance of internal pluralism, but generally, they emphasised general journalistic culture over formal rules or procedures. As one interviewee put it, "the best way to ensure plurality is to have proficient reporters and good journalistic standards".

Individual journalists tended to have a lot of responsibility and autonomy in Finnish newsrooms, although discussions between editors and the newsroom staff also took place to discuss appropriate weight given to different positions, especially when it came to political news.

The choice of expert sources was recognised as a significant issue by many interviewees. According to multiple interviewees, the fact that Finland is a small country often meant that the same handful of experts would be called

upon to comment on a particular topic, despite attempts to find people who could provide different angles. Some media organisations also reported that analytics were deployed to keep track of the balance (for example gender) of sources interviewed:

There have been times when Yle has been criticised for often having the same expert on-screen. The argument is that if the expert is well known, it's easier to trust. There have been statistics to follow up on the gender distribution of the experts, so the situation has improved [with more female experts included]. (Yle editor-in-chief, 2020)

One interviewee also raised a more general issue of whether journalism was collectively able to cover all layers of society, when journalists themselves are generally middle-class professionals living in the metropolitan area.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

2 POINTS In 2011

Independent media criticism in Finland is weakly institutionalised.

As a result of widespread adoption of different social media platforms, performance of the media has been under public scrutiny and critique more than perhaps ever before. However, this has not resulted in creation of new more formalised fora for media criticism. Individual activists in the mid-2010s established a few blog-based platforms – *Faktabaar*i and *Vastavalkea* are perhaps the best known – but they have not gained much significance (see also Indicator F10 – Misinformation and digital platforms). More influence has, instead, been gained perhaps by a couple of politically motivated web-services that drive a xenophobic and racist agenda, such as *Magneettimedia* and *Vastarinta*. The latter appeal especially to the supporters of the right-wing populist party Perussuomalaiset [the Finns Party].

Traditionally, the Finnish media has enjoyed a great degree of self-regulatory autonomy. This is especially due to long-standing collaborative relations between the media owners, the editors, and the journalists' union. This rather unique collaboration is internationally institutionalised in CMM, where not only all the parties are equally represented, but also whose 13 members include 5 representatives of the public (see also Indicators E4 – Minority/Alternative media & F7 – Procedures on news selection and news processing). Additionally, all CMM members oblige themselves to follow the Guidelines for Journalists (the code of ethics), and CMM represents around 90–95 per cent of the Finnish news media.

CMM's role in controlling the performance of the media is based on two functions: public complaints from members of audience and a system of sanctions against the misconduct of its member media organisations, and further acting on its own initiative regarding issues that it finds important for the public good and relevant for popular trust in the media. As a self-regulatory body covering most of the news media, CMM is the main media watchdog in Finland. Despite going through some turbulent years in the early 2010s, CMM has been able to progressively consolidate its public trust and reputation.

The other main platforms for media criticism include the *Journalisti*, a professional monthly journal published by the UJF, and *Suomen Lehdistö*, a bimonthly magazine published by the Finnish Newspapers Association. In addition, media criticism is exercised by occasional op-eds in newspapers and journals by renowned journalists and academics, television talk-shows (Yle's *Pressiklubi* until 2018, *Viiimeinen sana* [Final word] from 2021), radio debating programmes, and so forth. A number of books related to the "control of the controllers" have recently been published (see Herkman, 2011; Horowitz et al., 2019; Karppinen et al., 2015; Nordenstreng & Nieminen, 2017; Seppänen & Väliverronen, 2015).

(C2) Independence of the news media from powerholders

2 POINTS

Independence of the Finnish news media from powerholders is generally strong, but it is increasingly tested.

In general, journalists are not granted special status under Finnish law, except for legislation specifying the responsibilities of editors-in-chief. The confidentiality of sources is guaranteed in the Freedom of Speech Act (Ministry of Justice, 2003) and the professional code of ethics (CMM, 2014). Furthermore, new legislation is planned to protect people in vulnerable professions – teachers, health workers, and journalists, among others – from increasing threats and from being targeted through social media platforms (see Indicator F11 – Protection of journalists against (online) harassment). From the perspective of news media, new legislation would prevent the gagging of critical journalism from reporting on non-democratic and racist actions and opinions (Heijari, 2020).

The political parallelism that permeated much of the press and public broadcasting in the second half of the twentieth century has all but vanished. Almost all leading news media organisations now place emphasis on political independence. Despite this, however, it is quite possible and perhaps even obvious that both open and public as well as non-open and non-public relations between the powerholders and the media co-exist.

A permanent topic of discussion is the standing of the national public service broadcaster Yle. Its official status is based on a special Act of Parliament (Ministry of Transport and Communications, 2019), its Administrative Council is nominated by parliament, and its functions are financed by a special tax (Finnish Government, 2012), paid by all citizens. In principle, this potentially makes Yle vulnerable to all kinds of political pressures. This was tested in the 2010s a couple of times, ultimately leading to changes in the Yle's journalistic leadership (see Indicator F6 – Company rules against *external* influence on newsroom/editorial staff). In general, due to a wide-based parliamentary consensus, Yle has, however, been able to enjoy relative independence from political powerholders. On the other hand, the commercial media – whose one-time spokesperson coined the term "an eternal Christmas" to describe Yle's privileges – has continuously challenged this status because of its tax-based funding (HS, 2011).

In the private media sector, a few non-media companies count among the owners of the leading news media organisations. Most national and regional media outlets are owned by one of the major media conglomerates, mostly Finnish but some also by Swedish media houses, such as Bonnier (a major Nordic private media company) and Telia (a telecom company, majority-owned by the Swedish government). Most local newspapers in Finland are still owned either by a relatively small company, families, or other private individuals with historical roots in publishing (see also Indicator E1 – Media ownership concentration national level).

Rather than ownership or other direct economic ties, with regard to independence in relation to powerful economic actors, respondents suggested that problems arose from the strict information management and lack of openness of large corporations, which are not bound by statute with the same transparency requirements as public authorities.

In line with the 2011 report (Karppinen et al., 2011), many of the respondents also noted that journalists themselves should be more critical and that more resources were needed to fulfil the watchdog role as well against private companies and economic powerholders.

(C3) Transparency of data on leading news media

2 POINTS

In 2011 2 POINTS

Relevant information about the media system is publicly available, but it is difficult to find.

No general information services related to the media system exist, although such information is mostly freely available. Statistics Finland (a governmental statistical office) best provides general information, but also Finnmedia (an advocacy organisation for private media companies) offers some information

services. A highly relevant overall review of the Finnish media system emerged from the round table discussions between 2016–2019, invited by the Ministry of Transport and Communication. In the discussions, all major stakeholders of media and communication industries participated, including academic researchers. A concrete output of these developments was a thorough report, *The state of media- and communications policy and how to measure it* (Ala-Fossi et al., 2018), that included basic data on Finnish media ownership and business. A follow-up report was published in 2020 (Ala-Fossi et al., 2020).

Yle is supervised both by the government and by the parliament. According to the law on regulating public service broadcasting, Yle's board is required to provide an annual report of its activities to the Finnish Transport and Communications Agency, which represents the government. In addition to this more technical report, the Administrative Council of Yle must submit a more substantial annual report to the parliament. In turn, on the basis of the report, the parliament issues a statement on Yle's annual performance. Both reports are publicly available to citizens (Yle, 2019a, 2019b).

Information on media ownership remains freely available for the most part openly, especially since many media companies are now publicly traded (Ala-Fossi et al., 2018). The problem is that these reports and statements are not easily accessible to citizens. This is especially true in the case of foreign-owned media companies. The mainstream news media, as well as financial news, continue to regularly report major changes in the media markets. Some news outlets, including *HS* (owned by the Sanoma Group), have adopted a policy of publishing a standard acknowledgement of ownership connection whenever it publishes reports related to companies owned by the same parent company. Universities, research institutes, and professional organisations like UJF are other entities that provide various forms of information about the news media occasionally.

(C4) Journalism professionalism

3 points

Strong professional ethos and a high level of unionisation characterise the news media.

Recent studies have confirmed the findings of the 2011 MDM report: journalists and media professionals are largely well educated, and further, share a basic commitment to common quality standards (Rantanen et al., 2020; see also Karppinen et al., 2011). Together with local unions and member associations, UJF is reasonably active in organising further and continuing education for practising journalists (Journalists Union, 2018). According to the respondents, the professionalism among journalists in Finland remains high, and profes-

sional and ethical rules are generally well established. Time pressure, however, remains a chronic problem that threatens to decrease the daily time and space available to in-depth journalism and professional deliberation (Haapalainen, 2018; Association of Freelance Journalists in Finland, 2019; see also Karppinen et al., 2011).

The number of staff in relation to the amount of content produced has also decreased, which means less time is available for planning and writing single news items. While an overload of journalistic capacities was widely acknowledged as a real problem in the interviews, many respondents also noted, however, that the resources and tools available for providing quality journalism are still better than before (Rantanen et al., 2020). A tension between increasing demands of output and limited resources thus seems to have become a lasting situation in journalism. One interpretation of these developments is that there is an increasing divide between quality media, which strive to uphold and develop high professional standards, and a largely routinised bulk journalism that is gaining ground, especially online (Kivioja, 2018; Manninen, 2019; Pöyhtäri et al., 2016; see also Karppinen et al., 2011).

(C5) Journalists' job security

2 points

There are few specific legal provisions that apply only to journalists: but general legal provisions and labour contracts that cover the field provide journalists relatively strong occupational protection.

In 2011 2 points

General legal provisions on employment and labour contracts (Ministry of Economic Affairs and Employment, 2019) provide journalists with permanent contracts. Like any other occupational group, they enjoy a strong degree of protection against dismissal because of personal convictions or any other arbitrary reason. In the case of the termination of an individual's contract, their employer is obliged to demonstrate a financial or production-related reason for it. Dismissal must be preceded by a period of notice, preventing arbitrary firing. The Finnish collective employment contracts between the employer's unions and trade unions are extensive, and the terms of employment are generally complied with. The most recent collective contract representing journalists has been negotiated between the Finnish Media Federation (the employers' union) and UJF for the period 2020–2022.

UJF aims to improve the financial and professional positions of its members and their work conditions, and to supervise their interests at the levels of both collective bargaining and individual organisations.² Over the years, the union has taken several dismissal cases to court, which have generally been ruled in favour of the journalists, awarding compensations or damages for undue dismissal.

According to the interviews, a professional practice of allowing journalists to decline to write against their personal convictions has a solid foundation in Finnish journalistic culture – this is strictly followed in the news media. This principle is also stipulated in the journalists' collective contract (Federation of Finnish Media Industry & Journalists Union, 2020: 15, para. 2.7).

In the 2010s, about 200 journalists' jobs have been lost on a yearly basis from just newspapers because of both digitalisation and the economic downturn (Grundström, 2020). In addition, the proportion of freelancers has declined, currently comprising around 10 per cent of UJF's members. The use of short-term contracting varies between media sectors, but in general, short-term contracts, internships, or freelance contracts are still the primary way of gaining entry into the profession. As one respondent remarked, because of relatively high unemployment among journalists, there is no particular shortage of a temporary workforce, which has allowed employers to downgrade their earnings:

Yle is in a class of its own when it comes to [the amount of] part time jobs. The organisation is too large. The organisation should let the managers in the "lower- tiers" have more freedom to make arrangements. In the commercial media organisations, the situation is different, often when someone is on maternity leave there are older professionals hired to take their place, at a much lower salary; this is the nasty outcome. It is perfectly legal but a mockery of people's professionalism. (anonymous, 2020)

According to UJF, the unemployment rate among journalists is currently about 7.5 per cent, although many who have lost their jobs and later become freelancers and do not show up in this statistic (Honkonen, 2017).

(C6) Practice of access to information

2 POINTS

In 2011 2 POINTS

There is an existing law that, in principle, provides open access to public information, but problems remain in practice.

Finland has a long tradition of open access to government files. This can be traced to the world's oldest freedom of information law enacted in 1766, when Finland was part of Sweden. The current law is known as The Act on the Openness of Government Activities (1999) and is considered to provide citizens extensive access to public information. The Act states a principle that all documents are public by default unless there is a specific reason for withholding them, enacted within another law.

There are still no privileges specifically for journalists to access public information; rather, all citizens may access any official public document held by public authorities and private bodies that exercise public authority. Those requesting information are not required to provide reasons or even verify their

identity, unless they are requesting personal or otherwise-classified information. There are 32 legally specified categories of secret documents exempt from public release, according to a variety of potential harm tests, depending on the type of information.

In a couple of recent studies, journalists' experiences of the freedom of information legislation and their perusal of official documents were examined (Hiltunen & Suuronen, 2019; Media Industry Research Foundation of Finland, 2020). As per an "accessibility test" designed to evaluate the behaviour of individual officials towards information requests, it was found that officials were often slow to reply and reluctant to provide the information requested.³ Problems arose often from inconsistent legal interpretations of what comprised public or non-public issues, from negative attitudes among the authorities providing requested information, and partly from the journalistic practices themselves (see also Indicator E1 – Media ownership concentration national level).

A further problem stems from the fact that journalists do not always seem to be aware of their rights to access information. From the interviews with editors-in-chief and experts, it was also suggested that rather than the legislation alone, the more critical issues have to do with the skills and resources of journalists to find and access relevant information. Additionally, journalists often face problems in gaining information about actions that are still in preparation, which hinders public evaluation of the authorities' forthcoming plans. However, most respondents acknowledged that the existing law does give journalists and the general public relatively broad access to public information:

We get the information from the political system, it is open – the politicians have an open mind and are reasonably easy to approach and to acquire information from. On the other hand, documents are not always accessible. Sometimes you are denied access to documents that should be openly available. There might be a fee in order to get access. There are of course cases where clerks actually need to make an effort to find the information. It is not clear-cut, things are not working optimally in Finland. There are authorities who seek to keep some documents secret and not follow the "general spirit of the laws" or, even, restrict the reporters to some extent. (HS journalist, 2020)

(C7) The watchdog and the news media's mission statement

3 POINTS In 2011 2 POINTS

The significance of the watchdog role is widely recognised by Finnish media organisations.

News media's and journalists' allegiance to the Guidelines for Journalists was strongly underlined in almost all interviews. In the Guidelines, the watchdog

function is emphasised: "a journalist is primarily responsible to the readers, listeners and viewers, who have the right to know what is happening in society" (CMM, 2014) (see also Indicator F4 – Internal rules for practice of newsroom democracy). This was evidenced in a recent study on the basic professional values of Finnish journalists. Here, it was found that the "role of an impartial watchdog" was clearly emphasised in their professional profile (Pöyhtäri et al., 2016: 12). Additionally, most news media outlets have a mission statement or in-house rules of some kind – both typically making references to the freedom of speech, political independence, pluralism, and other democratic values (see also Indicators F7 – Procedures on news selection and news processing & E8 – Level of self-regulation).

Although most of the interviewed editors-in-chief acknowledged that mission statements have little practical meaning, the watchdog function remains strongly entrenched in the dominant professional ideology. However, when asked about investigative journalism, only the biggest news media houses could confirm that they had regular activities and investments in this area of work (HS, Yle); other respondents either stated that their mission does not include investigative journalism (MTV3, *Iltalehti*) or that although they recognised its importance, they did not have the necessary resources to conduct it regularly:

There aren't many resources available for investigative journalism. The tempo is high and the news is produced very quickly, which means there is a limited time resource to use for investigative journalism [...] Investigative reporting is mainly used when there are crimes that need to be covered. If and when there is an option to do investigative reporting it helps if the reporter shows initiative. But often it is not possible [practically] to do investigative journalism. (MTV3 reporter, 2020)

(C8) Professional training

2 points

In 2011 2 points

The importance of continuous professional training is broadly acknowledged, but journalists do not have opportunities enough to participate in it.

All respondents considered journalism training to be increasingly important, but resources allocated to and practices of it seemed to vary across media organisations. As in 2011, the problem in most newsrooms is that individual journalists did not have the opportunities or time to leave their daily duties to take part in training.

Recent research reaffirms the contention among journalists that possibilities for professional training should be improved. UJF and The Federation of the Finnish Media Industry have an agreement that promotes advanced professional training. The unions agreed that education should be diverse, attended

regularly, and that part of it should consist of training outside the journalist's own workplace. There is also a chapter on the education programmes included in the collective labour agreement (Federation of Finnish Media Industry & Journalists Union, 2020).

In many instances, journalists can take paid leave to further their education, and in the selected media organisations, various forms of training are in use. The largest media organisations, like Yle and HS, have their own internal resources for professional training, but most news organisations also use outside consultants or experts for internal training. Much of regular professional training focuses on technical skills, creative writing, and other professional skills. For more extensive knowledge training, media organisations tended to rely on universities and other places of journalistic higher education. Opinions differed on the recent developments.

(C9) Watchdog function and financial resources

2 POINTS

In 2011 2 points

While the watchdog function is seen as being crucially important, resources for investigative critical journalism are scarce.

Most respondents claimed that resources for investigative journalism were too scarce, although all respondents stressed its importance. Some of them underlined how – rather than viewing investigative journalism as a specific function separated from other forms of news journalism – it should form a part of everyday journalistic culture. Many respondents also noted that journalists themselves could be more active in pursuing their own ideas and investigative stories.

The editors-in-chief interviewed maintained that ad hoc provisions for in-depth investigations were available when necessary. Public service broadcaster Yle, which also possesses a specific investigative group, has exceptional resources for investigative journalism in the form of documentaries and other current affairs programming. Some newspapers, such as *HS*, have also experimented with independent units dedicated to investigative journalism. However, since it was found that the unit had become too disconnected from the daily process of newsgathering, investigative journalism is now integrated with daily news journalism.

The Finnish Association of Investigative Journalism (Tutkiva) was founded in 1992 to promote critical and thorough reporting within Finnish media. The association tries to facilitate investigative journalism by spreading information on good practices and about research methods, principles of transparency, sources, and source criticism by organising discussions and training, and also by awarding an annual prize for investigative journalism: "Lumilapio" [the Snow Shovel] prize. Based on the interviews, however, it seemed there were, in fact, less resources for investigative journalism today than ten or fifteen years ago.

Conclusions

Based on the above criteria, the overall assessment of the performance and structure of the Finnish mainstream media is fairly positive, although it was found that in some areas there is reason for concern. In an international comparison, the equal availability and reach of the main news outlets remain at a high level. The problems that were there already in the early 2010s, such as increasing market pressures, declining news consumption among young people, and mounting workload – usually emerging from haste in journalistic work – are similar to those of most other countries. A new trend that a growing number of journalists face today, and which is causing much concern, is the increase in harassment, hate speech, and targeting.

Despite these trends, many respondents were also quite optimistic, noting that the preconditions for providing quality journalism in Finland have also continued to improve, to some extent. In the last few years, the financial situation of the major media houses has strengthened, although on the flipside, redundancy for a great number of journalists and other media workers has also occurred. The legal preconditions for freedom of expression and access to public information are generally considered adequate, although some problems were observed regarding a reluctance of certain public officials to serve journalists with their information requests in a timely manner.

The professional ethos among journalists in Finland has remained strong, reflected in the established ethical guidelines and professional norms, as well as in UJF's recognised position. However, due to diminishing resources, there is growing concern about the state of journalists' advanced professional training. Other issues discussed more critically included the lack of organised media criticism, the resources for more daring and critical journalism, and somewhat inward-looking professional circles.

The independence of the news media from political powerholders was generally considered strong, but many respondents – as was the case in 2011 – called for a more critical attitude toward private companies and economic powerholders. However, certain novel ways of engaging with public issues – for example, by deploying social media platforms and other digital affordances – fall outside the scope of traditional journalism, and are, hence, largely beyond the scope of this report. Their potential influence on the relationship between the media and democracy in Finland remains to be discussed.

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Notes

- 1. https://pxhopea2.stat.fi/sahkoiset_julkaisut/joukkoviestintatilasto/html/suom0004.htm
- 2. https://journalistiliitto.fi/fi/
- 3. https://tietopyyntoongelmat.net/
- 4. https://www.tutkiva.fi/kategoria/yleinen/
- 5. https://www.tutkiva.fi/kategoria/lumilapio/

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