



# LUND UNIVERSITY

## **Intercultural Dimensions of Media Ethics: A study of Pakistani and Danish newspapers**

*Master Thesis*

**Presented to**

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## **ABSTRACT**

- Title:** Intercultural Dimensions of Media Ethics
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- Authors:** Georgina Gachaga & Sadia Shahid Khan
- Advisor/s:** Sverre Spoelstra
- Five key words:** Media ethics, CSR, Freedom of Speech, Globalization & Clash of Civilisations
- Purpose:** To examine intercultural dimensions of media ethics focusing on cartoon controversy by the study of editorials and code of ethics of Danish and Pakistani print media.
- Methodology:** Discourse Analysis
- Theoretical perspectives:** CSR in relation to media ethics & academic discussions surrounding interculturalism focusing on globalization and the clash of civilisations.
- Empirical foundation:** Code of ethics and editorials of sampled Danish and Pakistan newspaper organizations to examine the meaning of CSR and Freedom of speech in these respective contexts.
- Conclusions:** The study unveils the construed meanings of Social Responsibility and Freedom of Speech in the two contexts and their impact on civilizations.

# I. INTRODUCTION

The role and power of media in spreading information in a modern society is awesome. Once information - right or wrong, manufactured or factual goes out to the public, it creates its own rhythm. One can retreat, amend or correct it but cannot nullify it. A word spoken, written or heard has its own magic and life. (Quraishy, 2004: no page number)

On 30<sup>th</sup> September 2006, a Danish newspaper *Jyllands-Posten* printed 12 cartoons depicting the prophet Mohammed, putting press freedom in the country to the test and resulting in international furore. Several Muslim countries boycotted Danish goods, and Danish embassies came under attack. The cartoonists received death threats, bomb threats were made against the newspaper's headquarters and an attempt to shut down the daily's online site by hackers. Muslim leaders requested Prime Minister Anders Fogh Rasmussen to intervene in the matter, but he declined stating that it was an issue of free speech. *Jyllands-Posten* took the stance that they did not publish the cartoons with the intention of hurting Muslims rather they were just practicing their right to speak freely. The further re-printing of the cartoons early this year by a total of eighteen newspapers, stirred worldwide protests and fury amongst Muslim countries once again. According to the editors in chief of these newspapers, they were doing so in solidarity of freedom of speech.

Freedom of speech differs from country to country and is subject to restrictions and exceptions. In democratic countries individuals are free to say what they like but the state and other individuals- nationally or internationally can make this freedom more or less costly to exercise. As *Jyllands-Posten*, a leading Danish newspaper states in one of its editorial: "One of the prices you have to pay for freedom of speech is that you have to tolerate rudeness." (December 21, 05) For the press, some governments enforce censorship boards that monitor and limit the use of free speech. It seems important to discuss the extent to which media organizations can practice free speech without government or other forms of intervention. Arguably freedom of speech should be guided by media ethics and responsibility and should consider respect for other cultures.

Media ethics apply to journalism as a profession. In this study, we shall be using the terms journalist ethics and media ethics interchangeably. These ethics ensure freedom of speech but at the same time guide the journalists to where their freedom should be overshadowed by social responsibility. If these guidelines on morality and behaviour make the journalist or media organizations socially responsible and sensitive to other cultures is one of the questions that we have addressed in this study.

The concept of corporate social responsibility is about 'how companies conduct their business in a way that is ethical. This means taking account of their impact socially, environmentally, economically and in terms of human rights' (careers service, n.d.) and as such CSR cannot be separated from ethics. Rohmann cited in Alia (2004: ix) defines ethics as 'the study of moral principles and behaviour and of the nature of good'. These ethics as the moral practices are also followed by the newspaper organisations, no matter in which part of the world they are operating. The written ethical codes and practical criterion differ from country to country and organization to organization, but there is a significant overlap among mainstream publications and societies.

World press freedom review cites International Press Institute (IPI) Director, Johann P. Fritz as stating:

...we must recognise the editor's fundamental right to decide upon content, but this right entails responsibility and respect for the internationally defined limitations on press freedom. Editors, wherever they stand – local, national or international – must nowadays have global horizons.

Fritz mentions the importance of global horizons and respect for internationally defined limitations on press freedom that leads us to the discussion on intercultural dimensions of media ethics. The *Jyllands-Posten* 'cartoons controversy' is a good example of intercultural dimensions of media ethics. It is regarded by some as an act of irresponsible journalism, leading to debates on the relationship between universal rights of freedom of expression and press freedom on one side and responsibility on the other.

## **Rationale for the study**

This thesis seeks to examine intercultural dimensions of media ethics focusing on the cartoon controversy by the study of editorials and code of ethics of Danish and Pakistani print media. The thesis focuses on how the journalists in the two cultures construct the meaning of freedom of speech and CSR in their work.

## **Rationale for selecting the countries**

The rationale behind selecting Denmark is that the cartoon controversy originated from Denmark after the printing of the 12 cartoons by *Jyllands-Posten*. We selected Pakistan as it was one of the Muslim countries that heavily protested to the printing of the cartoons. The two countries represent different cultures which make it interesting to study how media organizations construct the meaning of press freedom and social responsibility in these respective contexts. According to the worldwide press freedom index 2007 conducted in 169 countries by Reporters without borders, a Paris-based international organization of journalists, Denmark is ranked 8<sup>th</sup> and Pakistan 152 for their levels of press freedom.

## **Rationale for selecting time period**

The time period selected for the study is the first 6 months after the first publishing of the cartoons, that is 30<sup>th</sup> September 2005 - March 2006, and 2 months after the republishing in 13<sup>th</sup> February 2008. The reason for heavily focusing on the first 6 months after the publication of the cartoons is because this corresponds with the time the cartoon controversy received much public dispute and debates. There were no editorials during the year 2007 in three of the newspaper that have been selected and very few after the first quarter of 2006. Considering this pattern, we have selected editorials within the stated time period.

## **Structure of the text**

In the next chapter 'Methodology' we describe the methodology chosen for the study i.e. discourse analysis. We have described how discourse analysis is taken differently by different academicians and researchers followed by the steps we have taken in this study while conducting discourse analysis. It includes outlining the sample for newspapers and editorials as well as generalisation and limitations to the research.

Chapter 3, 'Literature Review' introduces the theories surrounding CSR, freedom of speech and interculturalism as perceived by media organizations.

Chapter 4 'Research findings' provides the findings from the empirical data that comprises of editorials concerning Muhammad Cartoons as well as the code of ethics followed by Pakistan and Denmark.

Chapter 5 reviews discourses of media ethics focusing on CSR and freedom of expression; a detailed discourse analysis is done in this chapter and the patterns of media ethics discourse, its similarities and differences in both countries is observed. We have also focussed on the effects of globalization on cultures and its relation to media ethics discourse. It finally provides the suggestion to cope up with the situation, which serves as a benchmark for future investigation.

Chapter 6 'Conclusion' offers a summary of the key findings of the thesis.



## **II. METHODOLOGY**

The research methodology taken up for the present study is discourse analysis. Discourse analysis is a contested term that has varied meanings to different people. We shall start with the discussion of discourse and discourse analysis by different authors, followed by our understanding of discourse analysis and finally explaining the way we have applied discourse analysis in our study.

### **Discourse Analysis**

The terms discourse and discourse analysis are becoming more and more familiar in academic studies surrounding varied subject such as social sciences and linguistics. As a result, the meaning of discourse has been addressed in a number of ways depending on its application by different authors.

Macgilchrist (2008) offers us a broader perspective on viewing 'discourse' in the different disciplines that have applied it.

Within linguistics, discourse is often described as "language-in-use" or "socially situated text and talk", i.e., analysts ask how written, oral and visual texts are used in specific contexts to make meanings, as opposed to analysing language-as-an-abstract-system. Other disciplines (philosophy, history, sociology, anthropology, political science, media studies) tend to use the term to mean what is 'sayable' or 'thinkable' about a topic in any given political, social, historical, cultural context (Macgilchrist, 2008).

The different descriptions of 'discourse' offered by various authors do not necessarily need to contradict with the each other, but owing to its different applications in different disciplines the term is contested with no clear and definite definitions accorded to it. We illustrate a number of discourse analysis definitions taken by different authors in different fields.

Discourse Analysis according to McCarthy, is "the study of the relationship between language and the contexts in which it is used" (McCarthy, 1991: 5). Therefore, in this framework discourse analysis focuses on linguistics.

Discourse according to Foucault is related to power, but still within the social studies, as it operates by rules of exclusion. Discourse therefore is controlled by objects, what can be spoken of, ritual, where and how one may speak and the privileged, who may speak (Foucault, 1972).

Alvesson and Skölberg (2000: 204) state that 'discourse analysis is interested in the discursive level only and emphasizes rather than seeks to reduce variations in language use' when applied to social studies. They further add that discourse analysis claims that through language people engage in constructing the social world. They further state 'discourse analysis would claim that if we look at people's accounts in a sufficiently unbiased and ethical way, we will see that they almost always contain a good deal of variation.'

Alvesson and Skölberg offer a good description of discourse analysis fitting to our study; the 'cartoon controversy' editorials we have selected for our study tell a story as well as portray certain attitude towards 'Mohammed cartoons'. At times the attitudes each of the newspapers display contradict themselves which we focus on more closely. Our reflection of the attitudes displayed by the newspapers will help us establish when the different attitudes are expressed and in what context as well as the functions they fulfil.

However, we have not focused only on *one* newspaper's account of the cartoon controversy. We have included other accounts from other newspapers regarding the same issue. In this regard we also consider Lemke's definition of discourse analysis:

... the social activity of making meanings with language and other symbolic systems in some particular kind of situation or setting... When we want to focus on the specifics of an event or occasion, we speak of the text; when we want to look at patterns, commonality, relationships that embrace different texts and occasions, we can speak of discourses. (Lemke, 1995)

In our study the 'event' is that of the cartoon controversy and we have editorials as 'text' focusing on specifics of the controversy. The discourse analysis in this study will not be focusing separately on words formulating the texts, rather the patterns, commonality and relationships between the different texts (editorials)

to examine the meaning of media ethics, which gives us the discourse for our study.

### **Applying Discourse Analysis to our study**

In this study, discourse analysis has been conducted to examine the 'patterns, commonality and relationships' in the media ethics discourse produced by the Danish and Pakistani newspapers editorials on 'cartoon controversy'. Studying selected 'texts' from each of the four newspapers on the cartoon controversy helped determine the discrepancies in the discourse of media ethics.

### **Patterns under study**

The discourse analysis has been carried out to study if the relationship between responsibility and freedom of speech is constructed differently by the print media organisations in Denmark and Pakistan. We have analysed both the explicit use of the concepts of 'freedom of speech' and 'responsibility' in the editorials of the selected newspapers, the application of the two concepts in their practice as well as any contradictions the newspapers may have on their stance in order to get a better picture of the constructed meaning of media ethics.

Another focus in our study is the 'code of ethics' followed by the print media of both countries. The code of ethics provides the journalists with do's and don'ts of practicing journalism. Through discourse analysis we have studied the commonalities and relationships between the ethical standards described by the code of ethics of each country. We have also analysed its application in journalism by relating it to the discussions in the editorials.

The study of discourse from two different countries led to the findings on intercultural dimensions of media ethics, which serve as the rationale for our study.

### **Selection of newspapers**

Newspapers from both countries were selected as a sample by picking out 2 out of 5 most widely circulated newspapers from each country keeping in mind 'data accessibility'. The newspapers selected for the study are *Jyllands-Posten* and *Politiken* from Denmark; and *Dawn* and *Daily Times* from Pakistan.

The newspapers from Pakistan were selected as they provide their archive editions online. All the editions under the selected time period were thoroughly browsed and all editorials related to cartoon controversy chosen. Gathering the data through some other source was not easy due to time constraints and that is why an option of selecting the newspapers that do not provide their archives online was not considered.

The relevant editorials from Danish newspapers were searched through getting access to Danish newspaper database 'Infomedia' as it was suggested by both newspapers after we contacted them. Infomedia does not provide the option of searching the editorials date-wise and we carried out our search by using the key term 'Mohammed tegninger' (Mohammed cartoons).

## **Description of newspapers**

### **I. Jyllands-Posten**

*Jyllands-Posten* is a Danish daily newspaper based in Viby, Aarhus with the highest circulation of approximately 150,000 copies in Denmark founded in 1871. Since January 1, 2003, *Jyllands-Posten* has been owned in equal parts and published by Jyllands-Posten/Politikens Hus A/S. The newspaper has been criticized as being anti-migrant after a few controversial incidents. European Network Against Racism states that out of 382 *Jylland-Posten* articles on immigrants 212 were negative (Wikipedia).

### **II. Politiken**

Politiken is a Danish daily newspaper published by Jyllands-Posten /Politikens Hus with a circulation of 130,000 copies. It was founded in 1884 in Copenhagen by Viggo Hørup, Edvard Brandes and Hermann Bing. The paper established its present location in central Copenhagen at Rådhuspladsen (City Hall Square) in 1912. The newspaper mostly writes favorably about globalization, while showing concern about environmental problems and global poverty issues (Wikipedia).

### **III. The Dawn**

Dawn is Pakistan's oldest and most widely read English language newspaper. It was founded in 1947. Pakistan Herald Publications Ltd. publishes Dawn from

three centres; Karachi, Lahore and Islamabad. Publications under the Herald Group target the upper class and the better-educated segment of Pakistani society and consequently practice a liberal editorial policy. The newspaper has a daily circulation of 138,000.

#### **IV. Daily Times**

Daily Times is one of the leading English newspapers in Pakistan, which was started in 2002. The newspaper adopts a neutral policy and does not go for any political affiliation. The newspaper head office is in Lahore, Pakistan, whereas it has its regional offices in all other three provinces that provide a daily circulation of 65,000 nationwide.

#### **Selection of editorials**

All editorials from the sample study within the particular time frame are read but we have chosen specific paragraphs from the articles that we feel highlight intercultural dimensions of media ethics by considering the factors of freedom of speech and social responsibility of media organizations, which is the rationale of our study. For the purpose of study, the data collected from the Danish newspapers has been translated from Danish to English language.

The preferred editorials amounting to 19 for the study are selected from a total of 53. The complete list of editorials has been included in the appendix of the thesis and the list of the selected editorials complete with the title and dates of publication are listed below:

<b>Date</b>	<b>Title</b>	<b>Author</b>	<b>Newspaper</b>
30.09.05	Mohammeds Ansigt (The face of Mohammed)		JP
09.10.05	To Verdener (To the World)	---	JP
12.10.05	Ordet Frit (Free to talk)	---	JP

20.10.05	Selv censuren (Self censor)	---	JP
21.12.05	Diplomater på afveje (Diplomats go astray)	---	JP
29.01.06	Åbent svar (Open reply)	---	JP
16.02.06	Æreløst (Dishonourable)	---	JP
17.10.05	I Guds navn (In the name of God)	---	Politiken
21.10.05	Rolig nu (Calm down)	---	Politiken
04.02.06	Ytringsfriheden (The freedom of speech)	---	Politiken
13.02.08	Politiken mener: Truslen (Politiken's opinion: The threat)	Abb	Politiken
04.02.06	Sense and Sensibility	---	Dawn
18.02.06	The rage and fury over cartoons	---	Dawn
18.02.06	EU on cartoons		Dawn
19.02.06	Time for sobriety	---	Dawn
27.01.06	Something rotten in the state of Denmark?	Miranda Hussain	Daily Times
04.02.06	Europe's ill-advised freedom of expression	---	Daily Times
19.02.06	Muslim reaction must incorporate the complexity of the issue	---	Daily Times

20.02.06	A pathetic way of making Europe regret its cartoons	---	Daily Times
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We ended up selecting more articles from *Jyllands-Posten* because the first printing of the 'Mohammed Cartoons' was done by the newspaper. Majority of the editorials that followed acted as justifications to their printing of the 'cartoons' which form majority of our sample. To add to this, we identified some contradicting views on their stance on social responsibility and freedom of expression over the cartoon controversy.

### **Validity**

This was one of the most important factors that we needed to consider while conducting our analysis. In order to ensure that our research results are valid, we have tried to carefully consider the factors that might hinder the findings in attaining a higher level of validity.

The chances of having *bias or partial research findings* were reduced with two persons carrying out the study from the start to the end. Working together while having different backgrounds, different thinking and different cognitive fields made us understand each other's perspective while conducting the analysis and reduced the chances of getting biased findings.

In order to make sure, the findings are valid, we have read all the editorials under the selected time period to make the *sample size* adequate. We have included 19 editorials after considering the repetitive patterns as well as the writings that explicitly highlight intercultural dimensions of media ethics.

### **Generalisability and Limitations**

The newspapers under study represent 2 of the 5 most top rated newspapers in Denmark and Pakistan. The results of this study can be generalized to the practice of journalism as a profession because we include the code of conduct practiced by the journalists in the respective countries. To add to this all four newspapers at some point refer to the practice of journalism as they carry it out in their countries.

Our research findings might not fit in well in other professions reason being other professional groups follow their own codes of conduct that might not be in line with journalistic ethics. Other professional groups may have varied views on the meaning of freedom of speech and responsibility.

The practice of journalism is, consciously or unconsciously, guided by one's culture; the research findings can be generalized to the cultural settings because the journalists from both countries construct the meaning of media ethics in accordance with their cultural backgrounds. In other words, they represent their culture in the practice of media ethics.

There might be slight differences in the practice of media ethics within a particular country (Denmark), but comparing it to the practice of media ethics in the other country (Pakistan) would give absolutely different results, which makes the findings of our research applicable from the sample of four newspapers to journalistic practices as a whole in the represented countries.

In this chapter, we have discussed discourses as these are taken differently in different studies followed by the way we are applying the discourse analysis to our study. We have highlighted the patterns under study, the selection of newspapers and editorials and finally discussed the validity and generalisability of our study.

In the next chapter, we will be focusing on the academic studies and theories surrounding freedom of speech and corporate social responsibility as it relates to media ethics. Studies surrounding interculturalism will also be presented.



### **III. LITERATURE REVIEW**

In this chapter we take a look at the academic writings on the issues that are seen to affect intercultural dimensions of media ethics in journalism as a profession. Thomas Cooper in Alia (2004) identifies responsibility and free expression as the areas of concern in media ethics. We therefore begin our study by discussing literature under Corporate Social Responsibility (CSR) and Freedom of speech in media. We also discuss the role of code of conduct in journalism as a profession. Lastly we focus on interculturalism to determine the origin of the concept and the schools of thought surrounding it in order to determine its inception to media ethics today, if any.

#### **Corporate Social Responsibility**

Organizations take up CSR in a variety of ways depending on how they perceive the concept. Votaw 1973 cited in Carroll (1999:280) states

The term social responsibility is a brilliant one; it means something, but not always the same thing to everybody. To some it conveys the idea of legal responsibility or liability; to others, it means socially responsible behavior in an ethical sense; to still others, the meaning transmitted is that of 'responsible for,' in a casual mode; many simply equate it with a charitable contribution; some take it to mean socially conscious; many of those who embrace it most fervently see it as a mere synonym for 'legitimacy,' in the context of 'belonging' or being proper or valid; a few see it as a sort of fiduciary duty imposing higher standards of behavior on businessmen than on citizens at large.

This is something we are explicitly interested in finding in our thesis. A closer analysis of each of the newspapers we are focusing on will help us determine how they perceive the notion of CSR.

As with any other business organization, the responsibility of a media organization is outlined in its business policies and corporate attitudes which reflect their individual culture, brand positioning and the needs of their stakeholders. Some unique CSR issues that surround media organizations focus on their editorial policies, freedom of expression, culturally diverse output and

creativity. Their creativity can have adverse effects on their social responsibility as noted by KPMG;

Creatively the implications are more challenging. Media organisations can influence public opinion and taste and have to respond to and reflect the dynamic and diverse society in which they operate. CSR issues which are unique to the media sector arise from their output which includes news, information, entertainment, advertising and opinion. These are subject to varying levels of regulation and self-regulation. (KPMG and the media CSR forum, 2004:2)

*Jyllands-Postens* article titled 'Mohammeds Ansigt' (The face of Mohammed) published on the 30<sup>th</sup> of September demonstrates to what heights newspapers' creativity can influence public opinion and tastes and the newspapers perception of social responsibility towards other cultures.

In an article by Backer (2004), the writer's response to social responsibility of a media company is,

Surely, to tell the truth. To accord people a general expectation of privacy and dignity. To expose wrongs, but equally to allow that no-one is perfect. To entertain, for sure, but also to inform. And also to avoid conflicts of interest.

Let us examine each of these responsibilities one by one. To tell the truth, according to whom? What one considers true may not be true to another. How do the newspapers determine what is true and what is not? Kieran qualifies it by suggesting that one of the functions of the media is to report and evaluate appropriately 'events that affect our lives as members of society'.

Next; to accord people a sense of privacy and dignity. This responsibility is taken into consideration by media when reporting incidents such as suicides, murder charges etc. and this is a responsibility for all media to uphold under written codes. He continues to state that media has the responsibility to expose wrongs, but equally to allow no-one is perfect. This is where the media acts as a watchdog for its society exposing those who conduct themselves in an

irresponsible manner than the society expects. Backer adds that media has the responsibility to entertain as well as inform. In our view what may amuse one may be regarded as an insult by another and the responsibility of media to inform suggests that media acts as the public's ears and eyes. He goes on to add, media companies responsibilities should also avoid conflict of interest, in our view, to the market at large.

The market within which journalists practice determines what makes their news valuable as well as regards it to be responsible and demonstrate the values of objectivity as well as telling the truth. In so doing the market shapes what is been reported in a news story. This market is not limited within the boundaries of the operating country considering that the world is a global village, media organizations face objection and criticism of some of their news stories from outside markets as is exemplified in the *Jyllands-Posten* edition carrying the 12 cartoon drawings depicting Muhammad that resulted in conflict.

Jones in Carroll (1999: 283) suggests that social responsibility of media organizations is not limited to its immediate society and stockholders in the country of operation, the duty transcends to other societies in neighboring countries.

Corporate Social Responsibility is the notion that corporations have an obligation to constituent groups in society other than stockholders and beyond that prescribed by law and union contract. Two facets of this definition are critical. First, the obligation must be voluntarily adopted; behavior influenced by the coercive forces of law or union contract is not voluntary. Second, the obligation is a broad one, extending beyond the traditional duty to shareholders to other societal groups such as customers, employees, suppliers, and neighboring communities.

Notice that Jones points out that the obligation of an organization to be socially responsible is adopted voluntarily. Our analysis of the newspapers will help us find out if the organizations act socially responsible beyond what the law and any existing codes of practice prescribe.

## Freedom of speech in media

What is meant by free press? Is it the freedom of editors to decide what gets broadcast or published? Is it the freedom of journalists to offer fact and opinion without fear or sanction or persecution? Or is it the freedom of ordinary people to receive full and fair information on all issues that are likely to affect their lives and their interests? (Belsey & Chadwick, 1992:5)

Media ethics as a subdivision of applied ethics focuses on the practice of freedom of speech among other things within media organizations. The right to freedom of speech varies from country to country, is not absolute in any country and is practiced at different levels.

In Denmark, Freedom of speech is ensured under section 77 of the constitution.

Anyone is entitled to in print, writing and speech to publish his or hers thoughts, yet under responsibility to the courts. Censorship and other preventive measures can never again be introduced.

The constitution grants freedom to say whatever one pleases, but does not protect against one been punished for doing so. Certain legal restrictions are in place against cases of libel, blasphemy and racism. In principle, any limitation of the freedom of speech is a violation of people's right to know, even when the motives for these limitations are morally sound and rational by a consideration to a fellow man; Section 266B of the Danish penal code provides the libel law:

Any person who publicly or with the intention of dissemination to a wide circle of people makes a statement or imparts other information threatening, insulting or degrading a group of persons on account of their race, colour, national or ethnic origin, belief or sexual orientation, shall be liable to a fine, simple detention or imprisonment for a term not exceeding two years.

Not only insults of the Danish national church (the Evangelic Lutheran Church) may result in trials about blasphemy, several other religious communities are also protected. Section 140 adds:

Those who publicly mock or insult the doctrines or worship of any religious community that is legal in this country, will be punished by a fine or incarceration for up to four months.

Global surveys conducted on media independence indicate that the level of freedom of expression is dependent on the legal environment, political influence and economic pressure of a country. The legal environment puts in place the laws and regulations that may influence media content and restrictions on media operations. Political influences such as official censorship and self-censorship of news content may limit how freely media can operate and lastly, the economic conditions such as media ownership and bribery can minimize press freedom.

An emerging problem in journalism is that of self-censorship, particularly in covering political torn countries that restrict press freedom and against radical groups or cultures in a society. According to Wikipedia, 'self-censorship occurs out of fear or deference to the sensibilities of others without an authority directly pressuring one to do so'. As Klatt (2006) claims, political correctness has resulted in widespread self-censorship on topics like homosexuality, Islam, as well as sexual and racial differences, he further comments 'those who don't submit to political correctness and its dogmas are freely made the object of abuse, the price for not having censored oneself' (Klatt, 2006).

Self-censorship should not be confused with editorial 'taste' and 'decency' or intent to provoke in relation to understanding cultural practices. According to French sociologist Bourdieu, certain aspects of social practices and position within society shape an individual's taste (Bourdieu 1984:41). As consumers of media, readers consume the expressions and stories carried in newspapers, interpret and criticize them within their own taste. What may be regarded 'good taste' to an individual may be 'bad taste' to another.

Irrespective of written media laws by governments that lay down the boundaries within which media organizations may exercise their freedom of expression without hurting or insulting other citizens, there exists ways in which media can offend without straying beyond the law. Sensational reporting, bias, propaganda, personal attacks are a few examples.

Freedom of speech is subject to a variety of laws in many countries. This paper discusses the extent to which criminal/blasphemy laws inhibit press freedom and self censorship practiced by newspapers.

### **Role of code of conduct in journalism**

We also consider it important to discuss journalism as a profession and the role of code of conduct journalists practice. The studies on media ethics are illustrated in journalism as a profession. Journalism evolved in the 20<sup>th</sup> century as a profession. Before that it was considered a craft or skill of a novice who had not gone through university courses, writing their perspectives on certain issues, and eventually apprenticed their way into the field. Today journalism is taught in universities where students are taught different concepts in the field with major universities recognizing excellence and standards in journalism practiced under code of conduct (Smith, n.d). As with many other professions, ethical codes of practice are laid out as guidelines adhering to specific values that journalists should follow. Code of conduct applied by media organizations or press councils are considered to play an essential part in the quality of news or reporting of a journalist or media organization. The role of chief editor in media organizations is an important one as it ensures that the news and stories that get printed are in line with the ethical standards of the organization and within legal requirements.

However, there exists no uniform and enforceable ethical code to be followed by journalists worldwide but journalism as a profession upholds to certain virtues such as truth-telling and objectivity. 'Being "objective" in journalism generally means not reporting on what "I" think or feel, but on what has been seen and what can be supported by means of what others have to say.' (Iedema & White, 1994). We can assume that journalists are still struggling with the issue of objectivity in their work.

In this paper we have analyzed the codes of conduct of the newspapers in each of their operating countries in an effort to evaluate discrepancies in the codes they apply and to what extent these codes reflect on their perception of social responsibility and freedom of speech.

## Interculturalism

Cultures vary in distinct, significant and predictable ways. Adler & Gundersen (2002) cites culture as 'something (as in the case of morals, laws and customs) that shapes behaviour, or structures one's perception of the world.' When people come in contact with people from other cultures, they become aware of their uniqueness and start to appreciate their differences. However, some cultures consider themselves to be ethnocentric and hold a parochial perspective, a quality that is not befitting with today's global world setting.

What can make all media, including press intercultural? The communication of media across cultures make media function interculturally. According to Cook et al (n.d.), 'Interculturalism occurs when there is communication between people with perceived cultural differences.'

Intercultural study is encircled by a wide variety of literature. On one hand, it could be linked to the studies surrounding globalization whereas on the other hand it can be linked to clash of civilisation studies. The sociologist Anthony Giddens (1990:64) defines globalization as a 'decoupling of space and time'. He stresses that with instantaneous communications, knowledge and culture can be shared around the world simultaneously. In the new media era where individuals can access newspapers via websites or a news item that's of interest televised live within seconds owing to technological advances, the world becomes flat with no actual boundaries stopping the different cultures from interacting with each other.

According to Anthony Giddens (1999), the debates concerning the existence of globalization are over leading us to the second stage of debates addressing the consequences of globalization. These consequences of globalization are expressed differently by the academicians and scholars around the world. A paper written by John Tomlinson on Globalization and Culture concludes by stating:

The vast majority of us live local lives. But the impact of globalization is to change the very *texture* of this locality and therefore the nature of cultural experience in general. No longer is culture 'tied' to the constraints of local circumstances. What this implies is *not* that

globalization *destroys* localities but that cultural experience is in various ways 'lifted out' of its traditional 'anchoring' in particular localities. One way of understanding this is to think about the places we live in as being increasingly 'penetrated' by the connectivity of globalization. We continue to live in places that retain a high degree of cultural distinctiveness – London clearly has its own cultural 'feel' quite different from Beijing - but the point is that this particularity is no longer - as it may have been in the past - the most important determinant of our cultural experience. This 'deterritorialising' aspect of globalization – felt in very ordinary everyday practices like shopping, watching television, phoning our friends, visiting a restaurant – is, I believe the real - rather than imagined – cultural impact of globalization that we must begin both theoretically and empirically to understand (Tomlinson, 2006:11).

The deterritorialising aspect of globalization refers to the stance that globalization is weakening ties between culture and locality. This approach follows that cultures are becoming very similar or at least affected by the other cultures to a greater extent. Though, Tomlinson agrees that we are still living within our distinct cultures that are different from other cultures he argues that these distinct cultures are no more that important as they had been in the past rather 'cultural impact of globalization' that we experience in our daily lives is what he considers more important.

A paper presented at the annual meeting of the International Studies Association in Hawaii (2005) examines the impact of globalization on culture. In particular, it assesses both the beneficial as well as the harmful effects of globalization on the culture of the world's nation-states. It concludes that despite much of the concerns of those fearful of the proliferation of Western (American) cultural expressions, the effect on non-Western societies has been dramatically overstated. If, indeed, a global culture is detected with the identity of a nation-state, it must adapt within the local culture of the host country.

The paper refers to the term global culture, which implies that cultures are becoming more or less similar. This might be due to the impact of strong cultures on the weak. This is where we find the difference in the consequences of globalisation on culture. Tomlinson gives more importance to the global culture than the local cultures whereas the paper presented in Hawaii regards



local culture to define the global culture. As Kay (2001:14) puts it, "Geography is still important. Globalization has not diminished the economic significance of location."

In 1993, Samuel P. Huntington published "The Clash of Civilizations?" offers another angle of intercultural study, the essence of which lies in the hypothesis that in recent times the most highlighting differences that will lead to immense conflict will be cultural.

It is my hypothesis that the fundamental source of conflict in this new world will not be primarily ideological or primarily economic. The great divisions among humankind and the dominating source of conflict will be cultural. Nation states will remain the most powerful actors in world affairs, but the principal conflicts of global politics will occur between nations and groups of different civilizations. The clash of civilizations will be the battle lines of the future. (Huntington, 1993)

He further describes the nature of civilizations by saying that 'a civilization is a cultural entity. Villages, regions, ethnic groups, nationalities, religious groups, all have distinct cultures at different levels of cultural heterogeneity.' This is to say that communities within a same nation-state might have different cultures but those would be quite similar as compared to the culture of some other nation-state. Furthermore the culture of countries in Europe will be completely different from those in Hindu or Arab civilisations. 'A civilization is thus the highest cultural grouping of people and the broadest level of cultural identity people have short of that which distinguishes humans from other species' (Huntington, 1993).

Huntington named seven or eight major civilizations that would shape the world through their interaction namely; Western, Confucian, Japanese, Islamic, Hindu, Slavic-Orthodox, Latin American and possibly African civilization. He further provides a few reasons due to which the civilisations would clash, one of which is that civilizations differences are not only real but also basic;

The people of different civilizations have different views on the relations between God and man, the individual and the group, the citizen and the state, parents and children, husband and wife, as well as differing views

of the relative importance of *rights and responsibilities, liberty and authority*, equality and hierarchy (Huntington, 1993).

So, what is considered 'responsibility and liberty' by one might not stand under the same category for the other. According to Huntington these differences are 'far more fundamental than differences among political ideologies and political regimes as these differences are the product of centuries and will not soon disappear'.

Huntington also suggests that 'the world is becoming a smaller place' and this makes civilisations to understand the 'differences between civilisations and similarities within civilisations'. This he terms as another reason for 'why the civilisations will clash'.

A key question under conflict of civilisations identified by Huntington is, 'what are you?' rather than the formal 'which side are you?' addressing ideological conflicts. This is to say that one can change their ideology from communism to capitalism but if one is Danish by nationality, he/she will remain so. Digging deeper, religion is the factor that distinguishes even further; one might be half Danish and half Turkish but he/she cannot be half Muslim and half Christian. So, another reason for the clash provided in the theory is that cultural characteristics and differences are 'less mutable and hence less easily compromised and resolved than political and economic ones'.

Clash of Civilisations also talks about diminishing of local identities as do some proponents of globalization theory (Tomlinson, 2006). Huntington talks about the weakening of local and national identities in order to 'unite a civilisation', whereas, some proponents of globalization talk about deterritorialising of national boundaries to form the 'global culture'.

So far in this chapter, journalism as a profession has been brought under discussion followed by the role of code of ethics in journalism as a profession. The literature surrounding media ethics focusing on corporate social responsibility and freedom of expression has been discussed and finally; the impact of theories of globalization and clash of civilisation as they relate to interculturalism have been studied. In the next chapter, we will examine the

code of ethics from both Pakistan and Denmark as well as the paragraphs from the editorials, which serve as the key findings from our empirical data.

## **IV. RESEARCH FINDINGS**

In this chapter we present the discourse of media ethics by looking at Pakistani and Danish newspaper editorials on the cartoon controversy as well as their journalistic code of ethics independently in an effort to investigate how each of the countries constructs the meaning of social responsibility and freedom of expression.

### **Discourse of media ethics**

#### ***i) Jyllands-Posten***

*Jyllands-Posten* published the controversial 12 cartoons depicting the Prophet Mohammed. Following the public outcry from Muslims all over the world and demonstrations that followed, the newspaper justified their right to publish the cartoons under the right of freedom of expression granted by Danish law. *Jyllands-Posten's* stance on freedom of speech is illustrated from their editorials on the 'cartoon controversy'. According to the newspaper freedom of expression has no limits:

we have freedom of expression in this country, and the reference to the religious sentiments and feelings won't nullify the elementary institutional rights of freedom. (JP09/10/05)

*Jyllands-Posten* is of the view that freedom of expression is guaranteed by their democracy, but on the other hand they also state that it is not absolute as it is confined under the laws of the land:

The freedom of expression isn't unconditional because everyone has responsibility towards the law. If we violate, for example, the penal code and insult someone's honour or privacy, we are liable to punishment. In addition we also have a blasphemy paragraph, entitling

punishment to the persons, who publicly mock someone's religious sentiments. (JP09/10/05)

The cartoons were brought together with an article on self-censorship where they state that religious feelings should not intervene in freedom of expression.

The modern, secular society is rejected by some Muslims. They demand a special position, insisting on special consideration of their own religious feelings. It is incompatible with contemporary democracy and freedom of speech, where you must be ready to put up with insults, mockery and ridicule. It is certainly not attractive and nice to look at, and it does not mean religious feelings should be made fun of at any price, but that is of minor importance in the present context.(JP 30/09/05)

The newspaper further states that that self censorship taken by media organizations can paralyse freedom of speech. This came about when Islam followers demanded an apology from the newspaper citing the cartoons as an insult to their religion. The newspaper responded in an article titled 'Ordet frit' (free to talk) that they had no intention to apologize for an action that comes as a natural part of running a media company:

The cartoons have been brought together with an article about self censoring that spreads among people of media and artists and which can lead to unbearable and destroying action, paralysation damage to the freedom of speech. (JP12/10/05)

*Jylland-Posten* are of the view that because they are free to discuss various topics, certain people may get offended:

It is in the paper's free nature of debate that there can always be that some people feel offended by the subjects that are discussed, but religion and belief are not magic words that put the democratic debate out of function. (JP12/10/05)

In an effort to garner support for practice of freedom of expression, *Jyllands-Posten* went out to collect signatures from writers on the resolution for support of freedom of expression over the 12 Mohammed drawings. The resolution only gathered 22 signatures out of 80 authors. *Jyllands-Posten* considered the

behaviour of the writers, who did not sign the resolution, 'pathetic'. The newspaper did not agree with the views of those who did not sign that the support was at a bad time and the cartoons provoking. Instead the newspaper was appalled at the fact that their freedom of expression was been limited and little support was given by writers:

Notice that these excuses come from persons who live by the unrestricted freedom of expression. Its not only pathetic, it is dishonourable. It is contemptible. (JP16/02/06)

Have those non-signing writers not got it that we are witnesses to a global attempt to limit freedom of expression? Strong powers want to approve by law that not only we have to tolerate, but also respect religious sentiments to such a degree that we may no longer criticize certain religions. (JP16/02/06)

*Jyllands-Posten* state that their publication of the cartoons was within their set out ethical guidelines and those of the Danish legislation.

This journalistic initiative is in accordance with the newspaper's own ethical set of rules, with the state authority guiding press ethical rules and with the paragraphs in Danish legislation that regulates the media's behaviour and measure out punishment for violations. (JP 29/01/ 06)

*Jyllands-Posten* describes their purpose behind the publishing of cartoons by relating how and why they gathered the cartoonists. According to them, the cartoons were published after there were stories that certain people don't want to write, draw or say anything that would make Muslims feel insulting.

We must here gently remind that the cartoons were an illustration to an article about this self censor that controls large parts of the western world.

There was a current story about a leading museum of art that removed a certain piece of art not to insult Muslims and there were recent stories about that cartoonists do not dare to illustrate a child book, that translators do not dare to translate literature and comedians do not dare to be funny- all out of fear of insulting Muslims.

Such a self censor is not acceptable for a free press in a democratic society, and it was an illustration to the article about this fundamental problem that we chose to ask a number of cartoonists to give their suggestions on one of the reasons of the self censor. (JP 20/10/05)

Above citation is from an editorial that provides *Jyllands-Posten* stance in October 05. But later on in December they further state that they had no intention to insult and mock the Muslims, who were largely affected by the publication of the 12 cartoon drawings.

The purpose of *Jyllands-Posten* was not to provoke believing Muslims but to draw attention to a current democratic problem in consequence of wider circles fundamentalist interpretation of the holy script of Muslims. (JP 21/12/05)

*Jyllands-Posten* does not see it as their responsibility to calm the fury and protests arising from their publication of the 12 drawings of the prophet Mohammed and are not apologetic for their actions.

It's not the responsibility of the newspaper that a number of people, organizations and now also foreign states have exploited the case to ride their hobbyhorses, which is completely irrelevant for the newspaper. (JP 29/01/ 06)

## **ii) Politiken**

Politiken displays a different stance on freedom of expression, in practice and also as a right granted under Danish law, from that of its sister company *Jyllands-Posten*. Following the printing of the 12 cartoons depicting Mohammed, the newspaper's chief editor's comments and the views presented in other editorials clearly advocate for freedom of expression but within certain confines as we shall see.

Politiken supports that everyone under Danish legislation is allowed to express themselves freely, be it a newspaper, an individual or an organisation. As they state:

... no matter what you think about the drawings in Jylland-Posten, the newspaper is in its right to publish them. Like Muslims and others have

the right to dislike them. It's all a continuation of the freedom of expression ensured by the Danish legislation, and this is a right; we in the name of democracy have to stick to. (Politiken 17/10/05)

Politiken chief editor in one of the editorials disagree with *Jylland-Posten's* stance on the cartoon issue by arguing that *Jylland-Posten's* demand on Muslims for accepting what they have said is itself against the spirit of freedom of expression.

But interestingly enough *Jylland-Posten* thinks, that Muslims like that >>must be prepared to tolerate insult, mock, and ridicule<<. It was exactly those words, the newspaper's culture editor used, when the famous cartoons were publicized. (Politiken 17/10/05)

At another point, they add:

No religion is exempted from either critics or satire, similarly, little can anyone seize religious or others right to democratically counter such a critic. (Politiken 17/10/05)

Politiken stresses the free press and freedom of expression in Denmark. The newspaper takes issue with the ambassadors of Muslim countries for asking the State Minister to take action against the press citing it as crossing the limit.

But then the Muslim embassies want the state minister to take action against the press. That's where the chains drop off. (Cross the limit). The Muslim diplomats and their home governments should know, that state minister cannot or should take action against the press. Here we could yell and scream about attack on democracy and that too well-reasoned. (21/10/05)

Politiken takes the stance that there is nothing like absolute freedom of speech. In an editorial it states:

Still many are trying to portray this unfortunate case about Muhammad drawings as a simple dispute for or against the absolute and abstract freedom of expression, interestingly this case is about the limits for the freedom of expression in a democratic and tolerant society. (Politiken 04/02/06)

Upon the reprinting of the cartoons earlier this year, which Politiken also took part in, the newspaper extends its support in the right to freedom of expression in Denmark:

Regardless of whether *Jyllands-Posten* at the time used freedom of speech unwisely and with damaging consequences, the paper deserves unconditional solidarity when it is threatened with terror. There has never been a doubt, exactly because it is the core of the freedom of expression, that it's not the statement, that's defended, but it's the right to express it. That's also why, that Politiken today like many times earlier is publishing the cartoons, even though we never ever had sympathized with the provocation of *Jylland-Posten*. (Politiken 13/02/08)

In spite of thinking that this act of publishing cartoons was nothing other than 'provocation', Politiken also publish the cartoons many times. Lastly on February 13, 2008, about two and a half years after the cartoons were brought out for the first time by *Jylland-Posten*, Politiken reprinted the cartoons along with many other European newspapers to reaffirm their stance on freedom of speech. Their stance on the cartoons being 'unwise' does not change but they support the newspaper because they condemn the terror threats on *Jyllands-Posten*.

Politiken's chief editor is of the view that newspapers should exercise social responsibility in their news.

I think the publication of the Muhammad cartoons were an intolerant, thoughtless and stupid act, but this view doesn't make me an opponent to the freedom of expression. (Politiken 04/02/06)

Politiken regard the printing of the cartoons as irresponsible leading to unnecessary tensions in the country.

Firstly, it all started as a kind of provocation, which was never meant other than provocation and which more or less revealed some primitive perception. Secondly, the cartoonists made the parts of the Muslim society arrange a demonstration in Copenhagen last Friday. (Politiken 17/10/05)



The main difference between *Jyllands-posten* and Politiken in the discourse of media ethics in Denmark is demonstrated in their social responsibility. For *Jyllands-posten* they do not demonstrate responsibility for the chaos brought about by the printing of the 'Mohammed cartoons' or for the insult and mockery to Muslims. Politiken on the other hand mentions that *Jyllands-posten* was 'unwise' and in so doing demonstrated irresponsible journalism that meant to provoke.

### **iii) Dawn**

In the wake of the demonstrations occurring in Pakistan over the cartoon controversy, Dawn takes a clear stance in relation to freedom of speech by stating that they practice free speech along with responsibility and are not in a state of confusion.

There is the old conundrum about where one person's freedom ends, and the other's begins. In the subcontinent, with its multiplicity of religions and beliefs, newspapers (as indeed the broad mass of the people) have learnt to respect religious and ethnic sensibilities and do not confuse freedom of expression with freedom to ridicule a religion or a religious figure. The media here believes that, with its reach, it has a special responsibility in this regard as opposed to political groups or individual writers, etc., who can say or write what they want to. (Dawn 04/02/06)

Dawn advocates for social responsibility of newspapers organizations, or the media at large, with consideration of different cultures and beliefs.

In the subcontinent, with its multiplicity of religions and beliefs, newspapers (as indeed the broad mass of the people) have learnt to respect religious and ethnic sensibilities and do not confuse freedom of expression with freedom to ridicule a religion or a religious figure. The media here believes that, with its reach, it has a special responsibility in this regard as opposed to political groups or individual writers, etc., who can say or write what they want to. (Dawn 04/02/06)

At another point it refers to the behaviour of the *Jyllands-Posten* editor and terms the carelessness proved by the editor as tragic:

It would be tragic if the act of indiscretion on the part of an editor were to harm the long-term relationship between the Muslim world and the West. There are reasons to believe that saner elements in the West support the Muslim point of view (Dawn 19/02/06)

In addition to recognising social responsibility, Dawn refers to the ridicule against religions and writes that no matter what they are termed in political discourse; these are not caricatured because they are equally sacrosanct by the Muslims.

The "Christian West" and "Jewish Israel" are often referred to in derogatory terms in the political discourse in the Muslim world, but none of the revered figures in the two religions are ridiculed or caricatured because they are equally revered by Muslims. (Dawn 04/02/06)

Dawn advocates the view that the reprinting of blasphemous material was a deliberate effort to offend and hopes for a greater sense of responsibility in terms of understanding the religious and cultural sentiments across Europe.

The right to blasphemy is not one of the rights of the press, however free it may consider itself to be, and the extensive reproduction of blasphemous material cannot be seen as anything but a deliberate affront. It can only be hoped that a greater sense of responsibility will gradually evolve and the religious and cultural sentiments of the many communities in Europe will begin to be better understood. (Dawn 04/02/06)

In addition to writing about responsibility by the European media, Dawn looks at the other side of the picture and writes that threatening in retaliation is wrong and will only present a wrong and stereotypical picture of the religion.

Threats of violent action in retaliation for the cartoons' publication will be self-defeating and will only reinforce the stereotype of Islam as a religion sanctifying violence as portrayed in the western media. Protesting is one thing, declaring death on foreigners, as two Palestinian groups have done, is the wrong way to go about it. (Dawn 04/02/06)

Daily times acknowledges Danish stance on freedom of speech and admits that censorship cannot help a society to prosper. But, in addition to it, the newspaper

writes that 'lines should be drawn' and newspapers that have to inform and monitor should keep their principal responsibility of being unbiased in account.

#### **iv) Daily Times**

Daily Times talk about freedom of speech in relation to the 'cartoon controversy' and term it as bad excuse:

The decision to publish the cartoons is indefensible and the employment of freedom-of-expression argument is the worst excuse that can be used to justify it. (Daily Times 04/02/06)

In another editorial, Daily Times writes that Danish government is right in saying that there should be freedom of speech and government censorship should not be introduced, but newspapers should keep in mind that their responsibility includes impartiality as the most significant factor.

Of course, the Danish government is right on one count: freedom of press and speech remain the safeguards of any civilised or enlightened society. A society shrouded in state-sponsored censorship can never flourish. However, lines must be drawn. Newspapers must keep in mind that while they are charged with disseminating information and monitoring global power centres, impartiality remains their principal responsibility. (Daily Times 27/01/06)

The newspaper claims that 'democracy', as a reason given by western media to freely express themselves, does not single-handedly stand for freedom, there are other factors to consider as well. As it is stated in one of the editorials:

Europe cannot insult other religions, especially if others take their religions seriously and still revere their teachings and prophets. Democracy is not just about freedoms; it is about rights and duties. And rights and duties are bound in dialectic where the right of one is the duty of another and vice versa. (Daily Times 04/02/06)

Daily Times further state that there could have been a public debate on Islam by *Jyllands-Posten*, but they chose publish the cartoons instead, just to mock the belief of Muslims.

Instead of engaging in a public debate on Islam, Denmark's *Jyllands-Posten* simply mocked the beliefs of the country's second largest religion, to test the extent to which the Muslim community would accept 'free speech'. (Daily Times 27/01/06)

The newspaper refers to the cartoons as a deliberate offence and further states that the deliberate bias towards a particular group makes the line between freedom of expression and propaganda blurred.

For when an organisation has the unfettered freedom to promote an ideology deliberately aimed at offending a particular group, the line between freedom of expression and propaganda becomes blurred. (Daily times 27/01/06)

Daily times not only look towards the Danish action but also the response of the Muslims as incorrect. They are of the view that violent reaction would only strengthen the Europeans' view of Islam as backward.

Instead of taking the correct course of action, including boycotting Danish products and involving the Organisation of Islamic Conference to devise a joint strategy, we let mobs run riot and strike indiscriminately. This has only allowed those in Europe supporting the publication of the caricatures to point out that Islam is a medieval, violence-prone creed and Muslims can never live in and be integrated into modern societies. (Daily times 19/02/06)

The newspaper further suggests of having a code on freedom of expression approved by UN to see if freedom of expression is unlimited or if it includes responsibility as well. This code could help in guiding the states to their freedom in a standard manner.

The OIC must ask the UN to devise a code on freedom of expression in order to see whether such freedom is unlimited or, like all freedoms, must subsume the idea of rights and duties. That is the only way to create a norm and through it state practice. (Daily times 19/02/06)

What emerges from the discourse of media ethics in Pakistan from the studied editorials is that they practice freedom of expression in line with social responsibility. The discourse of media ethics in Pakistan also demonstrates that

social responsibility is an essential part for all media operating in any country to practice taking into consideration different cultures and beliefs.

## **Code of Ethics**

In Denmark, the private print press is vibrant, though many papers have political affiliations. The national 'code of conduct' is a legal code adopted by the Danish parliament with the acceptance of the National Union of Journalists in 1992.

The conduct outlines the collection and printing of correct information. News sources should be treated carefully and prejudicial information closely checked before printing however, attacks and replies in cases in which doing so is reasonable should be published consecutively and in the same way. Incorrect information that is printed is to be corrected by editors under their own initiative as soon as they are made aware that the information had errors. The conduct further outlines conduct of press contrary to good press practice where press is responsible not to violate a person's privacy and dignity.

The national code lays down ethics for court reporting journalists. This is where the limitations to press freedom in Denmark are clearly limited with the government imposing clear guidelines as to how court proceedings should be reported. The ethics of a court journalist demand that the identity of an anonymous source must be protected, no matter which methods the court system uses in order to get to know the identity of the source.

Under the National code of conduct, the fundamental points of view state that breach of sound press ethics comprises the withholding of rightful publication of information of essential importance to the public and compliance towards outsiders if this compliance can lead to doubts as to the freedom and independence of the mass media. It is also considered to be breach of good press practice if tasks that are in conflict with the content of the code are placed upon a journalist.

The safeguarding of the freedom of speech in Denmark is closely connected with the free access of the press to collect information and

news and to publish them as correctly as possible. The free comment is part of the exercise of the freedom of speech.

Breach of good press practice comprises the withholding of rightful publication of information of essential importance to the public and compliance towards outsiders if this compliance can lead to doubts as to the freedom and independence of the mass media. It is also considered to be breach of good press practice if tasks that are in conflict with these rules are placed upon a journalist.

Print media in Pakistan is deemed to enjoy higher levels of freedom to electronic media due to low literacy rates with English newspapers accounting for only a fraction: 2 million readers out of a population of 150 million. There is a tendency to leave the English newspapers alone to print whatever they want but the individual journalists are not always immune and face punishment. The government intervenes in the affairs of the press by issuing press advice and enforcing censorship. The Council of Pakistan Newspaper Editors (CPNE) condemns the use of press advice citing that creating sensational coverage is irresponsible; but it is a right and professional responsibility of editors to report facts (Association of Pakistani Professionals, n.d.).

In Pakistan, a 'code of ethics' was adopted in 1993 by the Newspaper Editors' Council of Pakistan – NECP (which merged in CPNE to form a united CPNE in 1996). Its aims and objectives include safeguarding the freedom of the press and working ceaselessly for the healthy growth of journalism in the country. Its members agreed upon 18-point code of ethics under the declaration of objectives.

The declaration of objectives (code of conduct) that is observed by press in Pakistan is formulated by the council in an effort to fulfil constitutional obligation of Article 19 of the Islamic Republic of Pakistan and to adhere strictly to the canons of journalism which they have listed as responsibility, Freedom of the Press, independence, sincerity, accuracy, impartiality, fair play and decency.

In Pakistan, the Council which has laid down the code of conduct to be followed by journalists believes that the duty of journalists/editors is to serve the truth. In order to fulfil the constitutional obligations placed on press freedom in the

country without inviting government interference the code of ethics declares avoidance of immorality and obscenity, false allegations, parochialism and incitement to violence in their publications. It further states that their only obligation is that of the public's right to know. Justified corrections or denials are published within the shortest time possible.

The declaration of objectives further states that, the press is to refrain from publishing anything derogatory to religion or which may hurt religious feelings of any sect or minority and that brings hatred to a friendly state. Moreover, the press is expected to refrain from publishing anything likely to undermine loyalty and allegiance to the armed forces and involving defence forces in politics and only offer fair comment on its performance and conduct.

12. The Press shall refrain from publishing anything derogatory to religion or which may hurt religious feeling of any sect/ minority.

13. The Press shall refrain from publishing anything likely to bring into hatred or contempt the head of any friendly state.

16. The Press shall refrain from involving the defence forces in politics and offer only fair comment on its performance and conduct.

In relation to court reporting care should be taken not to suppress the version of arguments of the contending parties.

Unlike Pakistan and some other western democracies, the press ethics in Denmark is formulated by Parliament and accepted by the Union of journalists. A Press council created by the Minister of Justice maintains sound press ethics. 8 members are appointed to the council; the chairman and vice-chairman (lawyers) who are recommended by the President of the Supreme court, 2 members from the journalists' union, 2 members from the editorial management of printed press, radio and television and 2 members from the council for adult education (Kruuse, 1991).

Until 1992, several newspaper organizations in Denmark felt that a papers ethics should be determined by the people working in the organization and nobody else. However, today the National code of conduct represents the legal appendix

and interpretation contributions to the legal demand of sound press ethics in Denmark.

## **V. ANALYSIS**

In this paper we have taken an interest in the Intercultural dimensions of media ethics. We have argued that freedom of speech and corporate social responsibility (CSR) cannot be isolated from ethics in organizations. We have also analysed the code of ethics adopted by both the countries.

### **Code of ethics**

The codes of ethics adopted in both countries are put in place to safeguard press freedom within their operating countries.

The Pakistan code of ethics gives an impression of self-censorship to be practised by the press under the guidance of the Newspaper editors. The declaration of objectives calls for refrain on a number of issues that if practised can be termed as irresponsible journalism by members of the Newspaper Editors Council of Pakistan.

Freedom of speech in Denmark is passed by law with no defined limits to its use. In our view it is therefore not surprising for some Danish press to print defamatory information as the journalists practice their right to free speech and only when a complaint from the insulted persons is forged to the Press council can action be taken upon them. 'When such cases are presented before Danish courts, the judges place the freedom of scale in one scale and all other opposite interests in another scale. However, nobody agrees if freedom of speech is as light as a feather or as heavy as lead and the outcome of such cases are anxiously awaited' (Kruuse, 1991).

Evidently, the national code of conduct passed by parliament in Denmark advocates for sound press ethics with no defined limits to freedom of expression. The code stipulates the use of correct information at the discretion of the editors and good conduct in the use of the information. Arguably it is the responsibility of the organization to put in place guidelines that illuminate their responsibility to the markets in which they operate. Such guidelines make them accountable



and minimize harm caused by 'inappropriate' content. Adopting such guidelines helps organizations examine their own cultural values and avoid imposing these values or stereotyping others.

### **Freedom of Speech for Danish Newspapers**

From the research findings presented in chapter 4 we find variances in the construed meaning of freedom of expression among two of the leading newspapers in Denmark owned and published by *Jyllands-Posten/Politikens Hus*.

*Jyllands-Posten* which is responsible for the publishing of the 12 cartoons, that resulted in demonstrations by Muslim followers worldwide and public disapproval by others who considered the cartoons to be insulting, firmly defends their right to print the cartoons as an act of freedom of expression.

The press in Denmark is granted freedom to express itself freely and *Jyllands-Posten* practiced this right. However, the newspaper overlooked one factor; freedom of expression is not absolute. Considering that the world has shrunk to a global village and that organizations need to factor in global horizons bearing in mind cultural diversity, there is indeed a limit to the practice of freedom of expression.

However, prior to the publication of the 12 cartoons by *Jyllands-Posten*, what is evident is that the newspaper does not accept the ethnocentric regard for Islam by Muslims that has resulted in self-censorship by media organizations and artists worldwide. Consequently, the newspaper has to pay the price of being seen as the abusers of political correctness for not having censored themselves.

Politiken, on the other hand acknowledges that freedom of speech is not absolute but stresses that press freedom in Denmark cannot be interfered with by the State as it infringes on the country's democracy. It is of the view that the cartoon controversy is not a case of absolute or abstract freedom of expression but the limits within which media can exercise press freedom in Denmark. The newspaper does not support self-censorship as a limiting factor in press freedom of expression.

It is clear from the newspaper that freedom of expression is a democratic right to all parties concerned, instigating that *Jyllands-Posten* was as free to print the cartoons in as much as the Muslims were to hold demonstrations in the country.

Freedom of expression is granted under Danish law to everyone under section 77 of the constitution. *Jyllands-Posten* as an organization registered under Denmark exercised this right in its publication on September 30, 2005. However, under Section 266b and 140 of the Danish Penal code blasphemy and libel laws limit the freedom of expression in Denmark too. As we have presented in the literature review, freedom of expression in a country is not absolute and the levels are determined by a number of factors.

Let us review the levels at which freedom of expression is practiced in a country. We noted three environments political, legal and economic, determine the levels at which freedom of expression can be applied. In Denmark, the political environment represents that of a democratic state that does not in any way interfere with press freedom, and this is seen to be the reason why the State Minister Anders Fogh Rasmussen declined to intervene in the matter when Muslim ambassadors demanded of an apology from the newspaper. Furthermore there exists no official censorship on news content limits. The legal environment which stipulates the laws and regulations that may influence media content impose blasphemy and libel laws that may limit freedom of expression in the country. However, the limits are not well defined and as Kruuse (1991) puts it 'nobody agrees if freedom of speech is as light as a feather or as heavy as lead'. The economic conditions in Denmark are favourable and the country though one of the smallest EU members displays a strong position in the number of daily newspapers in circulation totalling 42, with ownership of the dailies among a lot of different proprietors.

Conclusively, both the newspapers operating under Danish law showcase that freedom of expression in the country is strongly supported by both the government under legislation and media laws. The newspapers refer to the limits imposed by the law but do not agree to government or political correctness to interfere with press freedom in a democratic state. However, how one chooses to exercise this freedom is guided by their CSR policies as an organization.

## **Freedom of Speech for Pakistani newspapers**

In the case of Dawn and Daily Times both newspapers have a common stance on practicing freedom of expression. They take issue with Denmark in general and not only *Jyllands-Posten*, with Daily Times stressing that democracy is not just about freedoms but about rights and values too. Both newspapers can be seen to claim to practice freedom of expression hand in hand with responsibility. We feel it is important to highlight the environment within which the two Pakistani newspapers operate.

Freedom of expression is a human right under the human right act. Applying the same three environments to analyse the level of freedom of expression, it is noteworthy that the political environment is unstable with the government issuing official censorship on Pakistani press time and time again.

Secondly, looking at the legal environment, article 19 of the constitution gives room for official censorship;

‘... shall be freedom of the press, *subject to* any reasonable restrictions imposed by law in the interest of the glory of Islam or the integrity, security or defence of Pakistan or any part thereof, friendly relations with foreign States, public order, decency or morality, or in relation to contempt of court,[15][commission of] or incitement to an offence”

There is no national code of ethics between the government and the existing Newspapers Editors Council of Pakistan. The existing codes are agreed between the members of the council only in an effort to fulfil the constitutional obligation in article 19 without inviting government interference.

Taking this into consideration, in Pakistan similar to Denmark this freedom is not absolute. But, the level of freedom of expression is very low in Pakistan. It makes us ask if the press in Pakistan freely exercise their freedom of expression or if they are between a rock and a hard place, where self-censorship is inevitable.

Analysing the discourse from Pakistani newspapers make us wrap up the discussion in a way that the journalists in Pakistan take self-censorship for-granted. Not out of any pressure as the concept of self-censorship entails ‘no

external pressures' but because they consider that it is their responsibility to 'respect the sensitivities' of the others, which is also one of the factors for which self-censorship stands and is outlined in their code of ethics.

Ultimately freedom of expression is not absolute but the limits should consider that journalism is intended to inform and sensitize in a sensible manner, not to insult or provoke.

### **Corporate Social Responsibility for Danish newspapers**

From the research findings, it is found that *Jyllands-Posten* considers the publication of cartoons in accordance with their own ethical set of codes as well as the Danish legislation. It is important here to reconsider the concept of corporate social responsibility, which entails that it is the obligation of the corporation towards the society and this obligation must be voluntarily adopted (Jones cited in Carroll, 1999). This clearly illustrates that legislation has little to do with CSR, rather it is about the corporation's duty towards the society.

Moving forward, we see that *Jyllands-Posten's* purpose behind printing the cartoons was that they did not want to be in line with all others who impose self-censorship on themselves out of fear of insulting Muslims. This is why according to them they invited about 40 cartoonists to give their satirical suggestions on how possibly Prophet Mohammed could have looked like and out of those they select 12 cartoons for their newspaper. Later on the newspaper stated that the cartoons were the 'fundamentalist interpretation of the holy script of Muslims' (JP 21/12/05) and they were not meant to provoke Muslims.

There are two things that are noteworthy here; Firstly, they knew that such a thing can insult Muslims but they did not want to impose such self-censorship, but later on they say that they had no intention of insulting Muslims. Secondly, even if we consider that they had no intention of hurting Muslims and those were just fundamentalists' interpretation of the holy script, one can question why did they not portray the picture of Osama Bin Ladin or any ordinary Muslim and why only Prophet Mohammed? By doing so, *Jyllands-Posten* provoked or hurt even those Muslims who have nothing to do with fundamentalism. As Dawn in one of its editorial states:

For decades, the European media has been printing cartoons against Arabs that are in bad taste, but there have been no protests because such caricaturing has been accepted as part of the western media's persistent campaign to malign and humiliate Arabs in the context of the Arab-Israeli conflict....the present anger stems from what Muslims believe to be a direct attack on the last of the prophets. (Dawn 18/02/06)

*Jyllands-Posten* also takes issue with other press and writers in Denmark who do not sign the resolution for support of freedom of expression for the printing of the cartoons.

Many Danish writers behave pitiful in matter about freedom of expression of the 12 Mohammed drawings. One in itself broad and harmless resolution for support of freedom of expression could only gather 22 signatures among 80 authors. (JP/02/06)

Though, this article was brought to criticize the writers who did not sign the resolution, *Jyllands-Posten* acted in a positive way by bringing this out in public, which is a 'proactive stance'.

However, *Jyllands-Posten* does not hold itself responsible for the consequences after the cartoons were published by saying that people, organisations and also the foreign states have 'exploited the case to ride their hobby horses' (JP 29/01/06) and it is completely irrelevant for the newspaper. This practice can be easily related to the 'resistance stance' where they are refraining from acting and thereby, responsibility is negative.

Going by Votaw's definition presented in the literature, social responsibility by *Jyllands-Posten* is construed casually as just been 'responsible for'.

The other newspaper under study from Denmark is Politiken, which is found to be criticising *Jyllands-Posten* for publishing the cartoons initially by saying that it was an 'intolerant, thoughtless, and stupid act' (Politiken 04/02/06) and added that this view doesn't make them an opponent of freedom of speech, which was justified because Politiken is an advocate of freedom of speech but with limits. In order to justify its stance Politiken refers to the statement of *Jyllands-Posten* chief editor:

Also *Jyllands-Posten*'s chief editor Carsten Juste considered carefully, which Mohammed drawings, he will bring. "Had there been rude drawings among them, we had sorted them away i.e. we would never bring a picture of Mohammed peeing on the Quran" says the chief editor. Then why publish a cartoon, portraying the prophet as a terrorist, you could ask, but that's not my point here. My point is that even *Jyllands-Posten* now and then wants to restrict the freedom of expression. (Politiken 04/02/06)

So, Politiken seemed to hold the opinion that freedom of expression is never absolute and thereby it considers *Jyllands-Posten* responsible for all the outrage caused by the printing of the cartoons and says that cartoons were not meant to be anything other than provocation.

But the clash in Politiken's view is seen later on when it published the same cartoons in the name of solidarity of 'freedom of press'. According to them they did it as they could not stand the threats being given to *Jyllands-Posten*.

Politiken reaffirms that it's not the statement that they are supporting but the right to express it. It is important to emphasize here that Politiken termed the publication of cartoons 'unwise' when these were printed by *Jyllands-Posten* to highlight the issue of self-censorship and later on Politiken reprinted it to support freedom of speech; but what was 'unwise' while it was published in the name of self-censorship cannot be turned wise in the name of freedom of speech. So, Politiken has not been able to provide a logical argument that legitimises its act of reprinting the cartoons.

In relation to Votaw, the newspaper can be seen to interpret social responsibility in an 'ethical sense' this is demonstrated in how they go about expressing their views on the 'cartoon controversy' displaying greater responsibility towards the society.

### **Corporate Social Responsibility for Pakistani newspapers**

The research findings related to CSR from Pakistani newspaper 'Dawn' clearly shows that it advocates social responsibility along with the practice of freedom of speech. According to them having so many religions in the sub-continent have made them respect religious feelings and they don't mix up freedom of

expression with freedom to mock or ridicule. The newspaper does not only speak for itself but Pakistani media in general and holds an opinion that they find themselves carrying more responsibility in this regard than individual writers or political parties (Dawn 04/02/06).

This sense of responsibility should always be practiced by the media organisations as they are the ones that play a vital role in informing public and formulating their opinions on certain issues. This factor has also been brought out by KPMG and the media CSR forum stating that media organisations can influence public opinion and CSR issues which are unique to the media sector arise from their output and are subject to varying levels of regulation and self-regulation.

Dawn's stance on social responsibility is that no media, no matter how free it is, has the right to blasphemy. Dawn keeps its readers informed about the happenings as well as guides them to what is wrong and should not be practiced. For instance, Dawn terms the violent protests and death threats as wrong and holds the opinion that such reactions will reinforce the stereotypical image of the Muslims.

The other Pakistani newspaper taken into account is 'Daily Times'. Daily Times acknowledges Danish stance on freedom of speech but it also talks about the lines to be drawn. What is interesting to note here is that newspapers from both the countries talk about limit to freedom of speech, wherein, Pakistani newspapers clearly bring in the factor of responsibility, while the limits in Denmark vary. We shall come to this later while discussing intercultural dimensions of media ethics.

Daily times brings forward that if there are no check and balancing measures the line between freedom of expression and propaganda is easily blurred (Daily Times 27/01/06). The factor of impartiality is highlighted as a principal responsibility in daily times. It is also seen in the writings of this newspaper as on one hand the newspaper considers the practice of publishing of cartoons by the European newspapers wrong, on the other hand they take the 'violent' reaction by the Muslims wrong as well. So, they are not just considering one side

of the picture, but trying to remain neutral and acting in accordance with CSR; as it stands for them.

Furthermore, Daily Times is not just pointing at what is right and wrong, rather also acting responsibly by providing suggestions to what could be the solution to the difficulty being faced by both the Eastern and Western countries in the name of absolute or limited freedom of speech.

Social responsibility in relation to Votaw for both the Pakistan newspapers can be said to convey the idea of legal responsibility upholding to the laws against blasphemy and the ethical guidelines written by Council of Pakistan Newspaper Editors (CPNE).

### **A clash of discourses**

The clash of discourses sets out from globalization theory which suggests that there is increased awareness of cultural diversity between cultures, which can come about through media. This is so, in that we learn about different cultures their doctrines, values and practices from what we see on television and read in newspapers. Moreover, media decide what to debate on and how to debate depending on the consumers. Our cultural background and values dictate our tastes and preferences and resultantly we interpret things in a particular context from our culture. In the 'cartoon controversy' the Danish press with regards to *Jyllands-posten*, were aware of how Muslims view and follow Islam in their everyday life. The 'Mohammed cartoons' the newspaper printed were received in 'bad taste' by Pakistani media, which also represents the Islamic civilization where majority practice Islam, expressed their disapproval of the cartoons as they abused their religion and considered it lack of responsible journalism.

From the analysis above, what could be clearly deduced is that there are two different discourses on media ethics functioning in Denmark and Pakistan. What is considered freedom of speech and responsibility for one stands differently for the other. Furthermore, the code of ethics practiced in both countries address different issues.

The discourses present interesting dimensions which we will discuss below.



## **Is self censoring a responsible act of media?**

In Pakistan, freedom of speech is seen as something very important by the journalists but it always goes along with social responsibility. They refrain from expressing certain things out of respect for sensibilities of others, whereas, in Danish media this act of not expressing is considered as self-censoring. The journalists in Denmark talk about the democratic right to speak freely and for them self-censor is a hurdle in practice of freedom of speech. Thereby, while practicing the right to speak freely, responsibility for one is considered self-censor by the other, which is why the differences in the practice occur.

The finding above explains, to a certain extent, the result of the survey displaying Denmark on 8<sup>th</sup> and Pakistan on 152<sup>nd</sup>. Out of four sections of the survey one was on censorship and self-censorship. As it is clear from the analysis above, Pakistani journalists think that there is always a need to self-sensor in order to be responsible, which is understood differently in western media and describes the reason for Pakistan being rated low in that section.

As mentioned earlier, newspapers from both the countries talk about the limit to freedom of expression, which leads us to the next dimension.

## **What are the limits?**

In the case of Pakistani newspapers, they had a clear stance that there is a limit to freedom of speech as it should be practiced hand in hand with responsibility. On the other hand, Danish newspapers took the stance that freedom of speech is their democratic right, and then they also say that there are certain limits to the practice of freedom of speech under the penal code. We explore what are considered limits in Denmark and Pakistan. We take into consideration the decision passed by the Denmark's Director of Public Prosecutions Henning Fode in the case of Muhammad Cartoon controversy.

I have today decided not to institute criminal proceedings in the case of *Jyllands-Posten's* article "The Face of Mohammed", which was published on 30 September 2005 and where complaints were filed against *Jyllands-Posten* for violation of Sections 140 and 266b of the Danish

Criminal Code. My decision is that there is no violation of the said rules of the Danish Criminal Code.

Although there is no basis for instituting criminal proceedings in this case, it should be noted that both provisions of the Danish Criminal Code contain a restriction of the freedom of expression. Section 140 of the Criminal Code protects religious feelings against mockery and scorn and Section 266b protects groups of persons against scorn and degradation on account of their religion among other things. To the extent publicly made expressions fall within the scope of these rules there is, therefore, no free and unrestricted right to express opinions about religious subjects. It is thus not a correct description of existing law when the article in *Jyllands-Posten* states that it is incompatible with the right to freedom of expression to demand special consideration for religious feelings and one has to be ready to put up with "scorn, mockery and ridicule". My decision in the matter cannot be appealed to a higher administrative authority. This follows from Section 99(3) of the Danish Administration of Justice Act.

The case was considered not to be in violation of Danish criminal code. The code of ethics also does not say anything about limits and self-censorship is considered a bad practice, then what decides the limits and what are those limits? This reflects on the ambiguity of the limitations to free speech in Denmark.

In the case of Pakistan, the code of ethics followed by Pakistani journalists provides 'ethical standards' that guides the journalists about do's and don'ts of freedom of expression. Moreover, the law also grants special status to the religious feelings.

In summary, the construed meaning of media ethics varies not only in terms of practice of freedom of speech and responsibility, but also due to their cultural differences, leading to a clash of discourses. The issue that Pakistan considers important, religion in this case, is considered irrelevant for Denmark and that is one of the reasons why they don't think it is necessary to apply 'limits' or restrictions to freedom of speech while addressing religious issues.

## **Globalization demands intercultural understanding to avoid clash of civilisations – A benchmark for future studies**

The thesis illuminates intercultural dimensions of media ethics such as CSR and freedom of expression need to be carefully considered by media organizations in an effort to expand journalist understanding of other people's cultures and values. There is an old saying by Oliver Wendell Holmes, 'The right to swing my fist ends where the other man's nose begins'. We feel it is important for any country to consider this while practicing the right to speak freely in this age of globalization, which as presented in the literature can be termed as decoupling of space and time emphasizing that with instantaneous communications, knowledge and culture can be shared around the world simultaneously. However, in our thesis we observe that there is decoupling of space and time, and through instantaneous communication a message is transferred across borders, but it does not reduce friction and chances of misinterpretation, rather does the opposite since people interpret meanings differently in line with their cultural backgrounds/settings.

Our thesis highlights Kay's statement as is presented in the literature that the importance of geographies is still there and globalization has not deterritorialized the world, which further implies that in this globalized world, with extremely rapid communication, we continue to live in places that still retain a high degree of cultural distinctiveness and thereby the communication, especially by the media, needs to consider the varied levels of values and norms adopted by other cultures.

Intercultural dimensions of media ethics imply that the discourse of media ethics varies in different cultures. The dimensions make it difficult for media organizations to understand cultural differences and practices, which may lead to such conflicts as the cartoon controversy. In our view, a common code of practice along with certain other measures applicable to all professional journalists whether operating from democratic or non democratic states is needed. This does not imply that it will resolve all conflicts, but it can serve as a parameter for the practice of freedom of speech and responsibility.

Huntington (1993) suggests that cultural differences will lead to immense conflicts; the present study brings out the hypothesis that the lack of a uniform code of ethics will lead to clash of civilisations and globalization will only fuel this clash as the messages will be transferred quickly but misinterpreted due to different cultural backgrounds. This can serve as a benchmark for future studies.

There are many reasons behind this hypothesis. Firstly, as it is stated in Huntington's Clash of Civilisations that people of different civilisations will have 'differing views of the relative importance of rights and responsibilities, liberty and authority, etc.' In this thesis, Denmark as a part of European civilisation and Pakistan from Islamic civilisation have completely different views on the rights and responsibilities of individuals to speak freely a right that is passed on to the press in the respective civilizations.

The second and very important reason is globalization. Due to globalization, the world is shrinking. People from different cultures have increased interaction mainly through media, and as such they are more aware of the 'differences between civilizations and commonalities within civilizations'. The cartoon controversy highlights the cultural diversity between the Western and Islamic civilizations who expressed different views following the printing of the cartoons by *Jyllands-posten*.

The third reason behind our hypothesis lies in one of Huntington's reasoning behind why the clash of civilisations would occur, which is also vivid from this study that 'cultural characteristics and differences are less mutable and hence less easily compromised and resolved than political and economic ones... religion discriminates sharply and exclusively among people' (Huntington, 1993). Religion and nationality are taken at different levels of cultural heterogeneity by Huntington. It is seen in our study that religion, in the case of Pakistan, holds a special position both in law as well as code of ethics, whereas, in Denmark they do not agree that special consideration should be given to religious sentiments and due to this difference in cultural doctrines conflict arise over the printing of the 'Mohammed cartoons'.

## **CONCLUSION**

In this thesis we try to explore the way two cultures construct the meaning of freedom of expression and social responsibility. The two cultures represented by Pakistani media and Danish media each display independent discourses of media ethics in their countries. We focused on how the journalists representing the two cultures construct the meaning of freedom of speech and social responsibility.

In Denmark self censorship brought about by political correctness on religions such as Islam is an intervention that the press in the country does not support as it interferes with their freedom of expression. In Pakistan the political correctness can be said to nullify insulting language to a particular creed and not only Islam. However, it is noteworthy that Pakistan has the toughest laws against blasphemy worldwide.

We have discussed the importance of culture in determining the discourse of media ethics in the two countries. According to Huntington, religion distinguishes who we are much more than our nationalities. The discourse of media ethics in Pakistan is heavily embedded in their religious practices, both criminal laws and the outlined codes of conduct that the journalists subscribe to in the country have a strong leaning to their religion.

In Denmark, the culture is not embedded in religion. The country values its democracy to the extent that no form of intervention even religion can interfere with it. Evidently, globalization helps us understand the cultural practices of other nationalities but it does not suggest that we need to conform to the actual practices that a group follows.

We have demonstrated that Intercultural dimensions of media ethics suggest that media operating from different civilizations should be aware of the internationally defined limitations to press freedom. These limitations are not well defined, but what we came across is that in the East, blasphemy is a highly punishable crime and the media practicing in the region refrain from publishing any material that may be considered blasphemous. Religion can be said to be one of the limitations to the right to freedom of expression. Under section 140 of Danish law blasphemy is also punishable.

Thomas Cooper identifies responsibility and freedom of expression as the areas of concern in media ethics. Our study on the discourse of media ethics in Pakistani and Danish media reveals this too. However, the implementation of the two areas in the practice of journalism differs. In our analysis we have pointed out that both the newspapers representing the two countries talk about limit to freedom of expression with Pakistani newspapers factoring in responsibility while the limits in Denmark are ambiguous.

Finally, in our thesis we have provided a benchmark for the future studies by highlighting the observations from our study. We hypothesize that cultural differences affect the way journalists understand media ethics in their context. The lack of a uniform code of ethics for journalists may lead to a clash of civilisations and globalization will only fuel this clash as communication across cultures will be faster but misinterpreted due to different cultural backgrounds.

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## APPENDIX

### List of editorials:

Date	Title	Author	Newspaper
30.09.05	Mohammeds Ansigt (The face of Mohammed)	---	JP
09.10.05	To Verdener (Two worlds)	---	JP
12.10.05	Ordet Frit (Free to talk)	---	JP
17.10.05	Delegationen (The delegation)	---	JP
20.10.05	Selvcensuren (Self censor)	---	JP
30.10.05	JP og tegningerne (JP and the cartoons)	---	JP
16.11.05	Tyrkiets fejltrin (Turkey's false step)	---	JP
18.11.05	Lunken frihed ( )	---	JP
21.12.05	Diplomater på afveje (Diplomats go astray)	---	JP
23.12.05	Dilettantdiplomati (Amateur diplomacy)	---	JP
29.01.06	Åbent svar (Open answer)	---	JP
31.01.06	Også EU's sag (Also EU's Case)	---	JP
01.02.06	Brandstiftere (Firestarters)	---	JP
06.02.06	Fanatisme (fanaticism)	---	JP
08.02.06	Vestens værdier (Values of the West)	---	JP
16.02.06	Æreløst (Dishonourable)	---	JP
18.02.06	Mohammed -effekten	---	JP

	(The Mohammed Effect)		
28.02.06	Æreløst II (Dishonourable II)	---	JP
03.03.06	Et manifest (A manifesto)	---	JP
05.03.06	Satirens vilkår (The satires conditions)	---	JP
12.03.06	Søvnalds svigt(Søvnalds betrayal)	---	JP
21.03.06	Berlingske på afveje (Berlingske go astray)	---	JP
22.03.06	Velbekomme ( <i>Bon appetite</i> )	---	JP
13.02.08	Den evige trussel (The eternal threat)	---	JP
02.03.08	Ynkelt knæfald (pathetic pleading)	---	JP
03.03.08	16 europæere (16 Europeans)	---	JP
05.03.08	Dræbertegninger (killer drawings)	---	JP
12.03.08	Kom så, Europa (Come on, Europe)	---	JP
13.03.08	Der mangler noget(something is missing)	---	JP
17.10.05	I Guds navn (In the name of God)	---	Politiken
21.10.05	Rolig nu (Calm Down)	---	Politiken
17.11.05	Svær dialog (Difficult dialogue)	---	Politiken
07.01.06	Profetisk (prophetic)	---	Politiken
17.01.06	Nye stemmer (New voices)	---	Politiken
04.02.06	Ytringsfriheden (The freedom of speech)	---	Politiken
05.02.06	Antidanskhed (Anti-danish)	---	Politiken
28.02.06	Ny erkendelse (New acknowledgement)	---	Politiken

13.02.08	Politiken mener: Truslen Politikens Opinion: The threat	Abb	Politiken
04.02.06	Sense and Sensibility	---	Dawn
11.02.06	Violent protest	---	Dawn
14.02.06	When protests turn violent	---	Dawn
16.02.06	Losing perspective	---	Dawn
18.02.06	The rage and fury over cartoons	---	Dawn
18.02.06	EU on cartoons		Dawn
19.02.06	Time for sobriety	---	Dawn
27.01.06	Something rotten in the state of Denmark?	Miranda Hussain	Daily Times
04.02.06	Europe's ill-advised freedom of expression	---	Daily Times
16.02.06	A day of shame in Lahore	---	Daily Times
17.02.06	Ban all street protests	---	Daily Times
19.02.06	Muslim reaction must incorporate the complexity of the issue	---	Daily Times
20.02.06	A pathetic way of making Europe regret its cartoons	---	Daily Times
28.02.06	Two heroes, two attitudes	---	Daily Times
08.08.08	Danish cartoons and damage in Karachi	---	Daily Times

## **DANISH CODE OF ETHICS**

### FUNDAMENTAL POINTS OF VIEW

The safeguarding of the freedom of speech in Denmark is closely connected with the free access of the press to collect information and news and to publish them as correctly as possible. The free comment is part of the exercise of the freedom of speech. In attending to these tasks the press recognizes that the individual citizen is entitled to respect for his personal integrity and the sanctity of his private life and the need for protection against unjustified violations.

Breach of good press practice comprises the withholding of rightful publication of information of essential importance to the public and compliance towards outsiders if this compliance can lead to doubts as to the freedom and independence of the mass media. It is also considered to be breach of good press practice if tasks that are in conflict with these rules are placed upon a journalist.

A journalist ought not to be placed on tasks that are contrary to his conscience or convictions.

The rules comprise all editorial materials (text and picture) published in the written periodical press, in radio, television and remaining mass media.

The rules also comprise advertisements and publicity in the written periodical press, in radio, in television and remaining mass media. The rules also comprise advertisements and publicity in the written periodical press and the rest of the mass media to the extent, where no special rules have been established.

The rules comprise persons mentions and depicted, including deceased persons and also corporations and similar associations.

### THE CONTENT OF THE CODE

#### A. CORRECT INFORMATION

1. It is the duty of the press to bring correct and prompt information. As far as possible it should be controlled whether the information is correct.
2. The sources of news should be treated critically, in particular when such statements may be coloured by personal interest or tortuous intention.
3. Information which may be prejudicial or insulting to somebody or detract from other persons' opinion of the person concerned shall be very closely checked.

4. Attacks and replies should, in cases in which doing so is reasonable, be published consecutively and in the same way.
5. It shall be made clear what is factual information and what are comments.
6. Headlines and intermediate headlines shall as regards form and substance be substantiated by the article or publication in question. The same rule shall apply to the so-called contents bills.
7. Incorrect information shall be corrected on the editor's own initiative if and as soon as knowledge of errors of importance in the published information is received. The correction shall be given such as a form that the readers are given an easy possibility of noticing the correction.

#### B. CONDUCT CONTRARY TO GOOD PRESS PRACTICE

1. Information which may violate the sanctity of private life shall be avoided unless an obvious interest requires press coverage. The individual man is entitled to protection of his personal reputation.
2. Suicides or attempted suicides should not be mentioned unless an obvious public interest requires or justifies press coverage, and in such a case the mention should be as considerate as possible.
3. Victims of crimes or accidents should be paid the greatest possible regard. The same rule applies to witnesses and the relatives of the persons concerned. Collection and reproduction of pictorial material shall be made in a considerate and tactful way.
4. There should be kept a clear dividing line between advertising and editorial text. Text and pictures occasioned by direct or indirect mercantile interests should be brought only if a clear journalistic criterion calls for publication.
5. Other people's confidence must not be abused. Special regard should be paid to persons who cannot be expected to realize the effects of their statements. Other people's feelings, ignorance, or failing self-control should not be abused.

#### C. COURT REPORTING

1. The general ethical rules for journalists mentioned under A and B should also apply to court reporting.

2. The rules for court reporting shall also apply to the preparatory steps of a lawsuit or a trial, including the preparation of criminal bases by the police and the prosecution.
3. Court reporting should be objective. At any stage of the preparation of lawsuits and trials and during the hearing by the court, the journalists should aim at a qualitatively equal representation of the points of view of the parties - in criminal cases the points of view of the counsel for the prosecution and the counsel for the defense, respectively. A mention of a criminal case should be followed up by an account of the end of the case, whether this takes place in the form of a withdrawal of the charge, acquittal, or conviction.
4. The mention of persons' family history, occupation, race, nationality, creed, or membership of organisations should be avoided unless this has something directly to do with the case.
5. As long as a criminal case has not been finally decided or the charge has not been withdrawn, no information must be published which may obstruct the clearing up of the case, nor must pronouncements to the effect that a suspect or an accused is guilty be published. When a criminal case is mentioned, it shall clearly appear from the report whether the suspect / accused has declared himself guilty or not guilty.
6. To the widest possible extent a clear objective line shall be followed in deciding which cases shall be mentioned and in which cases the names of the persons involved shall be mentioned. A suspect's or an accused's names or other identification should be omitted if no public interest calls for the publication of the name.
7. Caution should be exercised in publishing statements to the effect that the police have been informed about a crime committed by a person mentioned by name. Such information should as a rule not be published, until the information to the police has resulted in the intervention of the police or the prosecution. This rule shall not apply, however, if the conduct which the police have been informed about is beforehand known in wide circles or is of considerable public interest, or if on the existing basis it must be assumed that the information to the police is solidly substantiated.
8. A suspect, accused, or convicted person shall be spared from having attention called to an earlier conviction if it is without importance in relation to the facts

which he is suspected of, charged with, or convicted of. In connection with other news, the earlier criminal cases against a named person should, as a rule, not be mentioned.

## **PAKISTANI CODE OF ETHICS**

### **'Declaration of objectives'**

1. The following are to be avoided in any form of publication such as news items, editorials, articles, photographs and advertisements:

- a. Immorality or obscenity;
- b. Vulgar and derogatory expressions against individuals, institutions or groups;
- c. Allegations known to be false and malicious against individuals, institutions, groups, newspapers and other publications;
- d. Arousing of sectarian, parochial or provincial passions and prejudices and class hatred;
- e. Glamorisation of crimes and vice;
- f. Incitement to violence.

2. Editors/journalists must be free of obligation to any interest other than the public's right to know the truth.

3. They will make constant efforts to assure that the public's business is conducted in public and that public records are open to public inspection.

4. The right of the individual to protection of his reputation and integrity must be respected and exposure of, and comment on, the private lives of individuals must be avoided except where it affects the public interest.

5. Presentation of news items and comments on events and airing of legitimate grievances should be fair and objective and there should be no wilful departure from facts. Headlines should be fully warranted by the contents of the items they accompany and photographs should give an accurate picture of an event and not highlight a minor incident out of context; off the record briefings should not be published and embargoes on release dates of news, articles and pictures should be rigorously observed.



6. The journalist should be entitled to protect his source of information revealed in confidence.
7. All paid commercial announcements, articles or advertisements should be specified as such.
8. No newspaper shall accept in any form or shape any financial and pecuniary advantage or obligation from or on behalf of any foreign country, concern, or agency. This does not apply to paid advertisements appearing as such.
9. Gifts, favours, free travel, special treatment or privileges can compromise the integrity of editors and influence their sense of justice and impartiality. Nothing of value should be accepted.
10. Secondary employment, political involvement, holding public office, and service in community organisations should be avoided if it compromises the integrity of editors. The editors should conduct their personal lives in a manner which protects them from conflict of interest, real or apparent.
11. Justified corrections or denials sent as a result of any incorrect information published by newspapers, periodicals or news agencies should be published within the shortest possible period of time so as to effectively eliminate the impression created by the original publication, which necessitated the issuance of a correction or denial.
12. The Press shall refrain from publishing anything derogatory to religion or which may hurt religious feeling of any sect/ minority.
13. The Press shall refrain from publishing anything likely to bring into hatred or contempt the head of any friendly state.
14. The Press shall not publish news or comments, photographs or advertisements which may undermine the security of the state or solidarity of the nation and its ideology.
15. The Press shall refrain from publishing anything likely to undermine the loyalty and allegiance of the defence forces and the civil armed forces.
16. The Press shall refrain from involving the defence forces in politics and offer only fair comment on its performance and conduct.

17. In reporting proceedings of Parliament and Provincial Assemblies, such portions of the proceedings as the Chairman/Speaker may have ordered to be expunged from the records of the House shall not be published and every effort shall be made to give the readers a fair report of what has been said by all sections of Parliament and Provincial Assemblies.

18. In reporting the proceedings of courts of law, care will be taken not to suppress the version or arguments of the contending parties.