

GOVERNMENT ADVERTISING AND MEDIA INTERVENTION*

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Free and autonomous media form an integral part of a robust democracy. Colloquially called by many the “Fourth Estate,” the media (particularly print journalism) play a critical role in holding the state and its officials accountable by seeking the truth about people, activities, events and issues, and investigating state agencies and politicians in the process. The media, therefore, represent the de facto fourth branch of modern democracies: the Fourth Estate.

To function as a potent check-and-balance force vis-a-vis the government, the media should be independent, but this has not always been the case in Thailand. The country’s media remain heavily monopolized by a few large institutions with considerable state intervention in various forms. One form of media intervention that has recently emerged is the procurement by the state of advertising space in the media. Such advertising is commonly used to disseminate important information to the public but often is also used for self-promotion by politicians and government bureaucrats. Such a situation may threaten the integrity of the media by adversely affecting its ability to act as a check-and-balance force with regard to the government. This

* This article is based on Deunden Nikomborirak and Tippatrai Saelawong. 2015. *The State and Media Intervention* (รัฐและการแทรกแซงสื่อ). Thailand Development Research Institute.

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form of media intervention remains insufficiently regulated and constitutes the central focus of this article.

The article is presented in four parts. In the first part, the different channels for media intervention by governments of modern democracies are explored. The second part contains an overview of the current regulations of government public relations (PR) campaigns in foreign countries and in Thailand. In the third part, journalism ethics and standards are examined in foreign countries and in Thailand. The article concludes with a set of policy recommendations on how the government could better manage state PR campaigns so that they would be more cost-effective and beneficial to the country.

1. CHANNELS FOR GOVERNMENT INTERVENTION IN THE MEDIA

There are three common channels for the state to intervene in the media of a democratic country, namely by regulating media content, through ownership of media institutions and by procuring advertising space in the media. The first two chan-

nels constitute a direct form of media intervention while the third channel is an indirect form that is effected through financial incentives. In general, although state regulation of media content has increased in recent years, its level of ownership of media institutions and the procurement of advertising space in the media has decreased considerably in the last few years.

1.1 Regulation of media content

The history of media content regulation in Thailand is far from linear. Initially, in the years after the Siamese Revolution of 1932, the country's first few constitutions offered very little in terms of providing for and protecting a free and autonomous media. Through the Press Act B.E. 2484 (1941), the government gained a tight grip over the media. The Act gave the government and the police broad powers to regulate the media, including the right to inspect any media content before it was published and to close down any publishing house if the government deemed the content of its publications to be "contrary to public order or good morals."¹

¹ Section 9 of the Press Act B.E. 2484 (1941).

The Act became a potent tool for the government to control the media, and it remained largely in effect until the passing of the 1997 Constitution, which was a landmark constitution with regard to media freedom.

With the 1997 Constitution and even more significantly the 2007 Constitution, Thailand ushered in a relatively progressive and free era for the media. Both constitutions protected the right of expression and the independence of the media to a degree that was unprecedented and also terminated the state's powers to close publishing houses and to investigate and approve media content before it was published. Shortly after the 2007 Constitution came into force, lawmakers passed the Printing Recordation Act B.E. 2550 (2007) to replace the Press Act 2484 (1941). The new Act significantly relaxed state control over the media, essentially reducing the state's role to that of only issuing professional licenses and monitoring content for possible *lèse-majesté* concerns. The 2007 Constitution also specifically barred politicians from owning or holding shares in media companies, which had become a source of controversy during the preceding Thaksin Shinawatra government.

Nevertheless, since the coup d'état in May 2014 and the ensuing ascension to power of the National Council for Peace and Order (NCPO), the progress made in media freedom has significantly been reversed. Under the current military regime, the government has stepped up its efforts to regulate content in the media, particularly online. Prime examples of such efforts are the recently proposed "Single Gateway" internet traffic control and surveillance system and the proposed "Computer Act B.E. 2559 (2016)," which would give the Minister of Information and Communication Technology broad powers to regulate online content. In July 2016, Prime Minister General Prayut Chan-o-cha issued NCPO Order 41/2559, which gave the National Broadcasting and Telecommunications Commission (NBTC) the power to shut down media outlets with full immunity if it deems the outlets to be disseminating

information that is threatening to public order and good morals.²

1.2 Ownership of media institutions

The state is quite involved in the ownership and operation of media institutions in Thailand. Government ownership of radio stations is especially prominent. Thailand currently has more than 500 radio stations, about 300 of which are FM radio stations, with the remaining 200 being AM radio stations. All of the FM and AM radio stations are owned by various agencies of the government. Of the more than 300 FM radio stations, the Public Relations Department owns the most, at almost 90 stations, followed by the Mass Communication Organization of Thailand (MCOT) and the Royal Thai Army. A few radio stations are owned by universities, such as Chulalongkorn University and Rajamangala University of Technology.

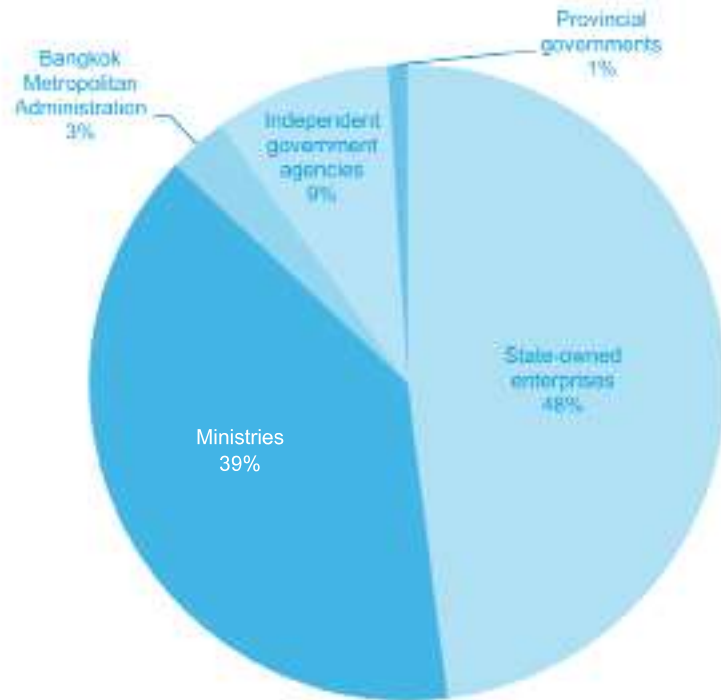
The government also has a significant presence in the terrestrial television industry where the state owns five of the six terrestrial television stations, while the state budget is used to finance the other station (ThaiPBS).³ Of the five channels that the state owns outright, two are operated by private companies under concession agreements while the other three are operated by state agencies.

Nevertheless, with the introduction of digital television in 2014, the government's role in the television industry became much less significant. Digital television in Thailand currently consists of 48 channels, 24 of which were auctioned off by NBTC to private companies in December 2013; NBTC thus serves only as the regulator rather than the content creator of those channels. Many other digital channels have since been licensed to other non-state organizations. Therefore, digital television forms a new media platform operated

² *Royal Gazette. NCPO Order 41/2559* (http://library2.parliament.go.th/giventake/content_ncpo/ncpo-head-order41-2559.pdf).

³ *Under the Thai Public Broadcasting Service Act B.E. 2551 (2008), ThaiPBS is financed by a tax of 1.5 percent on the purchase of liquor and tobacco. This means that the station's source of funding is fixed and allows the station to operate without advertising.*

Figure 1: Advertising Expenditure, by Type of Government Agency, 2013



Source: Calculated from data provided by the Nielsen Company.

primarily by private companies, thus diluting the government's presence in the television industry and in media ownership in general.⁴

1.3 Procurement of advertising space in the media

Advertising revenues represent a substantial bulk of total revenue for many media outlets today, particularly newspapers, for which an estimated 75-80 percent of their total revenues come from advertisements. Therefore, advertising represents an indirect channel for the state to influence the media through the purchase of advertising space.

According to the Nielsen Company (Thailand), in 2013 government agencies spent almost 8 billion baht on advertisements in the media. Of this amount, 1.245 billion baht, or 16 percent of the total expenditure on advertising, was used for placing newspaper advertisements. Figure 1 shows

those state agencies with the highest advertising expenditures in 2013.

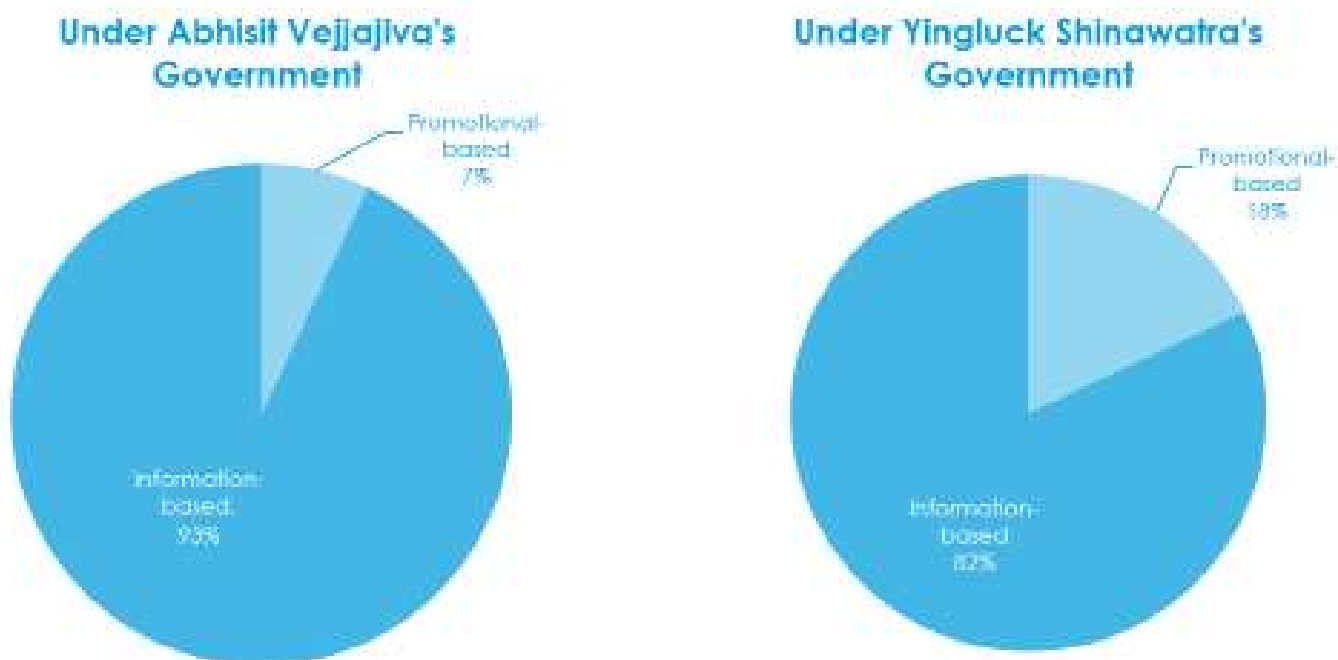
Government agencies usually engage in advertising to disseminate important information to the public, but a substantial portion of advertisements have been used for self-promotion. During the Abhisit Vejjajiva government in 2009 (July 1-15), 7 percent of all state advertising in four of Thailand's leading newspapers⁵ was based on the self-promotion of politicians and government bureaucrats. In the same period in 2012 under the Yingluck Shinawatra government, the figure stood at 18 percent, as shown in Figure 2.

Figure 2 therefore shows that advertisements for promotional purposes are a bipartisan issue. In recent years, however, efforts to tackle inappropriate advertisements have begun to take shape. In April 2015, Prime Minister General Prayut Chan-o-cha issued an order requiring that state agencies

⁴ ThaiPublica, "ประมวลทีวีดิจิทัล ทุนสื่อหน้าเดิมและใหม่ เคาะราคาสุดฤทธิ์" (<http://thaipublica.org/2013/12/digital-tv/>, retrieved on July 31, 2016).

⁵ The newspapers concerned were Thai Rath, Daily News, Matichon and Kom Chad Luek.

Figure 2: Types of Newspaper Advertisements Assessed under Two Government Administrations



Notes: The advertisements were classified into two types: information-based: state advertisements devoted to providing information without pictures of politicians or government bureaucrats; and promotion-based: state advertisements with some portions featuring pictures of politicians or government officials. The newspapers assessed were Thai Rath, Daily News, Matichon and Kom Chad Luek in the periods July 1-15, 2009 (Abhisit Vejjajiva's Government) and July 1-15, 2012 (Yingluck Shinawatra's Government). Identical periods were chosen to control for extraneous factors and also because these two periods were relatively free from political turmoil.

Source: Deunden Nikomborirak et al. 2016. *The State and Media Intervention*. (In Thai).

procuring advertising services worth at least 5 million baht must first before moving forward gain approval from the Committee to Track and Monitor the Spending of Government Budgets and the Cabinet.⁶ Nevertheless, a more holistic effort is needed to address this issue.

Media influence by the state through the procurement of advertising serves as the primary focus of this article because it is a form of media intervention that remains under-regulated in Thailand but which warrants critical scrutiny. Unscrupulous advertisements are an unwise use of taxpayers' money and are also a possible channel for politicians and government bureaucrats to influence public opinion

in the guise of being independent information, thus damaging the autonomy of the media.

2. REGULATION OF GOVERNMENT PR CAMPAIGNS

Many countries, including Thailand, have existing regulations regarding government PR campaigns. TDRI researchers examined such policies in Australia, Canada, France, the United Kingdom, and the United States of America and discovered several common themes. In fact, as will hopefully become clear, Thailand's regulations are actually comparable with those of many other countries but unfortunately are not as effectively enforced.

There are two common objectives to these regulations: to promote the efficiency of government PR campaigns and to prohibit self-promotion.

⁶ Thai Publica, "เปิดหนังสือ "บักตู" สั่งทุก "กระทรวง-กรม-รัฐวิสาหกิจ" รายงานโครงการฟออาร์ งบ 5 ล้านบาทขึ้นไปให้ คตร.ทราบ ก่อนจัดจ้าง" (<http://thaipublica.org/2015/05/government-advertising-11/>, retrieved on August 1, 2016).

2.1 Regulation of government PR campaigns in foreign countries

Coordination of PR campaigns (efficiency)

In countries such as Australia, Canada, and the United Kingdom, a centralized approval process exists for the allocation of state funds for PR purposes. In these countries, the central government would confer with representatives of the different state agencies that wish to spend on public relations before deciding whether to approve each request and how much money to allocate to each requesting agency. This is usually done at the beginning of each fiscal year. Such a process ensures that the messages from each state agency are coordinated. It also helps the state manage overall expenditure on such endeavors and prevents overlaps in procurement.

Transparency of PR campaigns (efficiency)

The process of undertaking PR campaigns is highly transparent in many of the countries assessed, with information related to both the budget and the content of the campaigns readily available to the public. For instance, in Australia and Canada, state agencies must make public the details of all PR campaigns, including budgetary information. In addition, the use of a centralized approval process for PR campaigns also means that data regarding PR campaigns are stored in one accessible location, which enables regulators to ensure standard pricing for PR campaigns.

Specific and justifiable purpose for PR campaigns (self-promotion prohibition)

Many countries have laws both at the national and state levels mandating that PR campaigns may be carried out only for certain purposes. Such purposes are by and large in the public interest, such as to disseminate important information and notices, such as about rights and safety, and to promote investment among the public. Australia, which has more ambiguous specifications than some other countries, designates the Cabinet and the national Independent Communications Committee

(ICC) to oversee the budgeting and approval of PR campaigns.^{7,8}

Policies banning self-promotion (self-promotion prohibition)

Australia and Canada have clear laws banning advertisements placed by public agencies that are political in nature or depict visual and/or audible portrayals of politicians and/or political parties. ICC is responsible for regulating such content in Australia, while the Auditor-General is responsible for the same task in Canada.

2.2 Regulation of government PR campaigns in Thailand

Coordination of PR campaigns (efficiency)

In Thailand, the state body responsible for implementing policies regarding state PR campaigns and formulating the state's PR strategy is the National Public Relations Committee (NPRC). The Committee, formed in 1984 and chaired by the Prime Minister, serves the primary purpose of coordinating the state's PR campaigns toward a common direction. In practice, however, NPRC faces many issues. First, its policymaking process still lacks sufficient involvement and input from other state agencies and from representatives of the private sector and the general public. As a result, NPRC policies often fail to tackle the real issues at hand and the recommendations of the Committee may not be practical, leading to state agencies ignoring them. Second, there is also no proper monitoring system for testing the effectiveness of the policies implemented. Lastly, NPRC policies are heavily influenced by politics, and they lack continuity in

⁷ Department of the Premier and Cabinet, "Government Advertising and Communications Policy" (<https://www.dpc.wa.gov.au/GuidelinesAndPolicies/Documents/govt-advertising-communications-policy-20160111.pdf>, retrieved on July 21, 2016).

⁸ Department of Finance, "Compliance Advice by the Independent Communications Committee on Government Advertising Campaigns" (<http://www.finance.gov.au/advertising/reports-by-independent-communications-committee/>, retrieved on July 21, 2016).



view of Thailand's short-lived governments.

Transparency of PR campaigns (efficiency)

The investigation of state funds used for PR campaigns—after they have been undertaken—is the responsibility of the Office of the Auditor-General (OAG). All state agencies are required to submit details of their procurement plans to that office. Although OAG is an independent body with legal powers to implement administrative sanctions or forward cases to the National Anti-Corruption Commission (NACC) to pursue criminal charges,⁹ it primarily performs only *ex post* investigations rather than *ex ante* investigations, which is still lacking in the entire process. Canada is one of the countries where OAG conducts *ex ante* investigations before PR campaigns are approved.¹⁰ Critically, OAG does not have the power to halt the transfer of funds for a campaign even if it finds the project to involve an unsatisfactory use of funds. Therefore, its power comes into effect only after a campaign has ended. Moreover, OAG audits are still primarily compliance audits, which are audits investigating compliance with the law rather than performance audits, which investigate the effectiveness of PR campaigns. Performance audits tend to be much more complex and detailed, and often require input from experts in the field.

Specific and justifiable purpose for PR campaigns (self-promotion prohibition)

There are specific and detailed guidelines for both central government agencies and local government agencies to follow before they embark on a PR campaign. Central government agencies follow the guidelines specified by the Bureau of the Budget, while local government agencies follow guidelines specified by the Ministry of Interior.

⁹ Office of the Auditor-General of Thailand, “History of the Office of the Auditor-General of Thailand” (<http://www.oag.go.th/th/ประวัติการตรวจเงินแผ่นดินไทย>, retrieved on July 21, 2016).

¹⁰ Thai Publica, “ริบไดร แสลงวงค์ ชุก-ชอน-ซ้อ ปัญหาใช้งบฟ้อารรัฐ และกลไกปิดฉากการใช้เงินหลวงโฆษณาตัวเอง” (<http://thaipublica.org/2015/08/government-advertising-19/>, retrieved on August 1, 2016).

Guidelines in general mandate that the agencies engage in campaigns only as necessary with specific purposes and through the most cost-effective channels. The guidelines also bar self-promotion without clear public benefits. Nevertheless, although the guidelines are robust and similar to those observed in other countries, there are no legal mechanisms to enforce compliance with the guidelines, which means they are vulnerable to violation.

Policies banning self-promotion (self-promotion prohibition)

As mentioned previously, the Prime Minister's order in 2015 to require prior approval of state procurement of advertisements worth at least 5 million baht is a positive step toward banning self-promoting state advertisements. Guidelines also exist that bar self-promoting advertisements. However, these measures are insufficient as smaller-scale advertisements remain unregulated and the guidelines are still not legally enforceable.

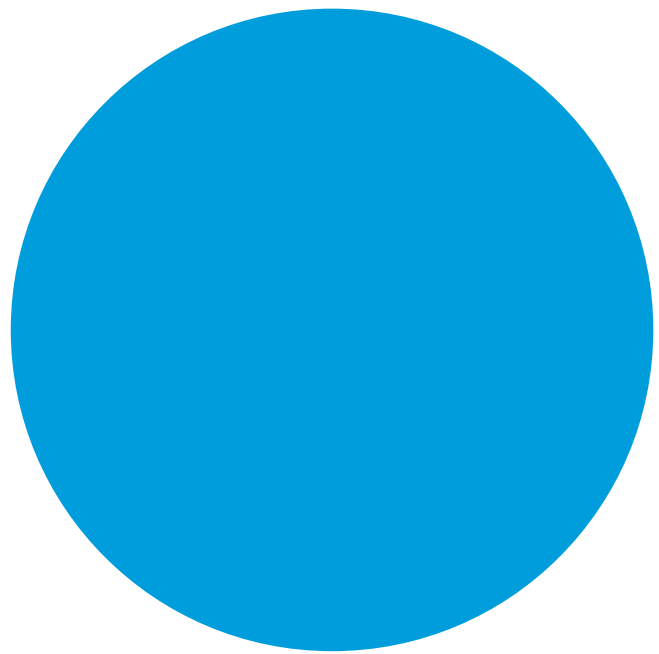
3. JOURNALISM ETHICS AND STANDARDS

Although regulating state agencies is important as they are “buyers” of advertisements, the media, the “sellers” of advertising space, are also an important part of the picture that needs to be addressed as they are also a party in the transaction. The following section contains an exploration of current journalism ethics and standards; this is done in the media of Thailand and countries that have high levels of media freedom, according to the Press Freedom Index report.¹¹

3.1 Journalism ethics and standards in foreign countries

Several means of maintaining high ethical standards in the realm of journalism are practiced in different countries. In countries such as Finland, Germany, Luxembourg, the Netherlands, and the

¹¹ Reporters Without Borders, “2016 World Press Freedom Report” (<https://rsf.org/en/ranking>, retrieved on July 25, 2016).



United Kingdom, the media regulates itself without state intervention, often through the national press councils of each country. The national press council generally issues a code of ethics that members are expected to follow. Although there are no legal means to sanction violators of the code, the national press council can threaten wrongdoers with expulsion, which may adversely affect their reputation and bargaining power. This form of regulation has positives in that it reduces the risk of excessive state intervention and is more cost-effective for the state. Nevertheless, it relies heavily on the ability of the national council to develop robust internal oversight mechanisms to effectively promote high ethical standards among members. To holistically reflect the interests of the public, the boards of national press councils are often composed of officials both from within and outside the media industry. Officials from outside the media may represent those vulnerable to media content, such as children.

In other countries, such as Denmark and Finland, the promotion of journalism ethics and standards is a joint exercise (co-regulation) between the state and the media. In such countries, the national press council and the relevant state agencies jointly issue and enforce a code of ethics for journalists. This model ensures greater compliance but may risk

excessive state intervention if not handled properly. It is important to note that none of the countries assessed allow the state solely to regulate and enforce journalism ethics and standards; this is done in order to maintain the independence and integrity of the media. Observations on journalism ethics and standards in foreign countries are summarized in the Table below.

In terms of the content of the codes of ethics, three common aspects are particularly emphasized across the countries observed. First, particular importance is given to the accuracy of the infor-

mation presented. Second, the distinction between fact and opinion should be clear. Lastly, content that may lead to hate and discrimination should be avoided. With regard to enforcing the codes of ethics, countries where the media practices self-regulation generally require only that an apology be extended to those offended by the content, and that the offensive content be modified or deleted. There are no legal mechanisms to prosecute wrongdoers, aside from cases of serious infringements for which the country’s judiciary may decide to prosecute. This is not the case for countries where the state

Table: Issuance and Enforcement of the Journalism Code of Ethics in 7 European Countries

Country	Issuer of Journalism Code of Ethics		Enforcer of Journalism Code of Ethics	
	Name	Status	Name	Status
Germany	German Press Council (<i>Presserat</i>)	Professional council*	Same as issuer	
United Kingdom	Independent Press Standards Organisation	Public council	Same as issuer	
Netherlands	Netherlands Press Council (<i>Raad voor de journalistiek</i>)	Public council	Same as issuer	
Finland	Council for Mass Media (<i>Julkisen sanan neuvosto</i>)	Public council	Same as issuer	
Luxembourg	National Press Council (<i>Conseil de Presse</i>)	Professional council	Same as issuer	
Sweden	Various professional press councils	Professional council	Press Ombudsman (<i>Pressombudsman</i>)	State
			National Press Council (<i>Pressens Opinionsnämnd</i>)	Quasi-state
Denmark	Danish Press Council (<i>Pressenaevnet</i>)	Public council (State appoints board members)**	Same as issuer	

*Professional councils are those that comprise only representatives from the press. Public councils are those that comprise representatives from both the press and society at large.

** The Danish Press Council’s board is composed of representatives from both the press and society at large. Although every board member is appointed by the state, this structure ensures that the state is not solely responsible for issuing and enforcing the country’s journalism code of ethics, therefore maintaining the structure of co-regulation. (In Section 41 (1) of the Danish Media Liability Act 1991, it is stated that: “A Press Council shall be established comprising a chairman and a vice-chairman and six other members to be appointed by the Minister of Justice. The appointment of the chairman and the vice-chairman, who must be members of the legal profession, shall be made upon recommendation by the President of the Danish Supreme Court. Two members shall be appointed upon recommendation by Dansk Journalistforbund (the Danish Journalists’ Union), two members shall be appointed to represent the editorial managements of the printed press and radio and television upon recommendation by these media, and two members shall be appointed as public representatives upon recommendation by Dansk Folkeoplysnings Samråd (the Danish Council for Adult Education).”)

plays a role in enforcing the code of ethics. In such countries, such as Denmark and Sweden, there are legal means to prosecute violators.

3.2 Journalism ethics and standards in Thailand

The two most influential press councils in Thailand are the National Press Council of Thailand (NPCT) and the Thai Journalists Association (TJA).

NPCT was established in 1997 with the intention of promoting independence of the media from the state through self-regulation among media institutions without the need for state intervention. Today, NPCT can count as its members more than 50 newspapers nationwide. NPCT also has a code of ethics, the Code of Conduct for Journalists, B.E. 2541 (1998),¹² which is relatively strong and thorough. Despite having a code of ethics the content of which compares well with that of other countries, NPCT has been criticized by many as weak when it comes to enforcement. In July 2016, *Neaw Na* newspaper withdrew its membership from NPCT, citing ineffectiveness in ensuring journalism ethics among its members.¹³ Additionally, the NPCT code of ethics applies only to members, and the Council has no legal power to prosecute. Since membership in NPCT is voluntary, this means that those that may have violated NPCT rules may simply leave the Council without repercussions.

TJA was established in 2000 as a result of a merger between the Reporters' Association of Thailand and Thailand's Newspapers Association. The aim of TJA is to foster unity among journalists and promote good journalism ethics and standards. TJA members are composed not only of newspapers, but also magazines, television channels and radio stations. TJA's board of directors is composed of 15 members, all of whom are journalists from media

companies associated with TJA.¹⁴ Membership in TJA is on a voluntary basis. TJA provides many benefits for members and their families, including education and healthcare costs. Furthermore, the Association also has a code of ethics with which it expects its members to comply. The Association has a five-person panel to monitor and investigate possible cases of journalistic malpractice among members.¹⁵ Those found guilty may be expelled from the Association and thus lose access to the benefits that the Association provides.¹⁶

Using the examples of the above-mentioned associations, it can be seen that Thailand still relies primarily on self-regulation within the media when it comes to upholding and promoting decent journalistic ethics and standards. Existing professional councils/associations do not have the legal power to make membership compulsory and implement sanctions on violators except in cases of serious violations, such as defamation, where the state may decide to prosecute the violator.

4. POLICY RECOMMENDATIONS

As mentioned previously, the problem of state intervention through the procurement of advertising space in the media involves both state agencies, i.e. the “buyers,” and the media, i.e. the “sellers.” As both are parties in the transaction, therefore, two recommendations will be presented in this section: a new law to regulate PR campaigns by state agencies, and strengthening of the enforcement mechanism of journalism ethics and standards.

4.1 Pass a new law to regulate PR campaigns by state agencies

A new law devoted specifically to the regu-

¹² *The National Press Council of Thailand*, “Code of Ethics for Members of the Press Council of Thailand” (<http://www.presscouncil.or.th/code-of-ethics-for-members-of-the-press-council-of-thailand/>, retrieved on July 23, 2016).

¹³ *Bangkok Post*, “Media ethics in question as Naewna quits Press Council” (<http://www.bangkokpost.com/news/general/1040885/naewna-resigns-from-national-press-council>, retrieved on July 22, 2016).

¹⁴ *Thai Journalists Association*, “Thai Journalists Association—TJA” (http://tja.or.th/index.php?option=com_content&view=article&id=2568:thai-journalists-association-tja&catid=133:2011-03-25-09-28-42&Itemid=76, retrieved on July 23, 2016).

¹⁵ *Ibid.*

¹⁶ *Section 12 of the Code of the Thailand Journalists Association B.E. 2543 (revised in B.E. 2557 (2014)).*

lation of the procurement of advertising spaces by state agencies in Thailand should be passed. Such a law should address the content of state PR campaigns/advertisements, budgetary procedures for such campaigns, and the law's enforcement mechanism.

Content of PR campaigns/advertisements

The law must explicitly prohibit the use of public funds for PR campaigns that contain the name, picture or voice of the “buyer,” namely politicians and government bureaucrats. The content must also be aligned with the roles and obligations of those particular agencies and the advertisements must also state that they are funded through the use of public money.

Budgetary procedures

The law should lay out a budgetary procedure for the funding of PR campaigns by state agencies. There should be a plan at the beginning of each fiscal year which establishes the theme and the budget for state PR campaigns. This process should be completed before the allocation of any PR funds in that fiscal year. Furthermore, information about all procurement items by all state agencies related to PR purposes should be made readily available to the public in an easily accessible format.

Enforcement mechanism

It is no secret that far too many laws in Thailand are very loosely enforced, often due to a lack of a clear enforcement mechanism. For this proposed law, the Auditor-General should be in charge of enforcement. The Auditor-General should investigate and determine the appropriateness of PR campaigns, particularly with regard to whether they are informational or promotional in nature. The law should also establish an independent committee responsible for *ex ante* investigations of PR campaigns before they are released, a process which is already practiced in many countries.

4.2 Enforcing journalism ethics and standards

The government should mandate that all media institutions join a press council, such as the National Press Council of Thailand. Making membership mandatory is critical in enforcing council guidelines as leaving the council would no longer be an option. Compulsory membership would add significant leverage for the press councils, many of which already have decent guidelines for their members but lack enforcement capabilities. Press councils should also be actively monitoring media content for possible malpractice, and punishments must be sufficiently harsh. The United Kingdom's Independent Press Standards Organisation (IPSO), for instance, fines members up to £1 million in cases of serious violation.¹⁷

In addition, the board of the press councils should be composed of roughly an equal number of representatives from within the media and from other groups in society. Such a structure would ensure that the voices of both parties are heard and are heard equally when it comes to voting power on the board. For instance, the board of the Netherlands Press Council (*Raad voor de Journalistiek*) is composed of 10 journalists and 10 non-journalists, such as journalism/communication arts professors, which can aid in ensuring that council policies and decisions are fair and appropriately targeted. It also gives prestige and credibility to the councils and negates possible accusations of bias.

Foreign examples have shown rather unambiguously that government intervention is not necessary for enforcing and maintaining high journalism ethics and standards. Self-regulation within the media is possible if the press councils are given sufficient power and are constantly proactive, although they also need to prove their credibility and neutrality on a consistent basis. Nevertheless, for serious infringements, such as defamation, there should still be legal repercussions which could lead to administrative or criminal charges.

¹⁷ Independent Press Standards Organisation, “About IPSO” (<https://www.ipso.co.uk/about-ipso/>, retrieved on July 24, 2016).