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

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Abstract

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

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

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Introduction

Artificial intelligence (AI) is increasingly being adopted in the news industry. The public release of ChatGPT, a so-called Large Language Model (LLM), in November 2022 by US start-up OpenAI has accelerated this trend, with news organisations looking to the technology with both high expectations and concerns. AI, and especially foundation models with the functionality to create realistic, multi-modal content ranging from text to visuals are seen as technologies with the potential to change the way people interact with news, how news organisations produce and distribute content, as well the broader information environment and news organisations' business models (Simon, 2024).

While it is too early to say if and how these expectations will ultimately be borne out by reality, many news organisations – some of which had already started to adopt AI in the past (Diakopoulos, 2019; Beckett, 2019, Newman, 2024) – have started to experiment with and implement generative AI. According to recent surveys by industry body WAN-IFRA and the Reuters Institute, many organisations experiment with LLMs for tasks such as summaries, illustrations, copy-editing or generally improving workflows, among other things (WAN-IFRA, 2023, p. 5, Newman, 2024). These uses are in line with ongoing AI experimentation.

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

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

Yet, despite some pioneering work studying the content of such guidelines, questions about these inhouse guidelines remain. Amid calls to regulate AI more tightly, including in the news, how advanced are early efforts? Where do they converge or diverge and what are the blind spots? Given that AI's shaping power acts broadly in the same way across contexts, one could expect that publishers' reactions to these effects would show at least some uniformity, too. However, how and where foundational AI guidelines in the news converge or diverge from each other – both in terms of what they look like (formal characteristics) and what they say and do not say (thematic characteristics) remains an open question. Our paper addresses this gap. We examine a total of 52 journalistic AI policies from publishers in twelve countries, predominantly located in Western Europe and North America. We argue that AI

guidelines show patterns of isomorphism, suggesting that publishers across national media systems and organisational categories respond to the rise of AI in broadly similar ways. This is in line with the sampling of countries, exhibiting a strong regional focus. However, there are indications that national idiosyncrasies and organisational categories continue to matter as important moderating factors. Funding models seem to lead to different priorities, with commercial publishers often more detailed and with a stronger focus on allowed and prohibited uses as well as data protection. Finally, our study shows that AI guidelines at the time of writing exhibited various blind spots – especially around questions of sustainable AI, technological dependencies, and AI inequalities and human rights – leaving important aspects concerning the use of AI unmentioned, and thus potentially under-regulated.

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

Literature Review

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

Self-Regulation of the News Through Guidelines

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

News Organisations' Social and New Media Guidelines as Precursors

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

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

Policies for the Use of AI in News Organisations

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

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

Theoretical Framework

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

While both national differences and organisational differences continue to matter in the news and play a role in shaping publishers' and journalists' practices, including around the adoption of new technologies (Hanitzsch & Mellado, 2011; Peruško et al., 2020), the news industry, or its organisations, are also increasingly shaped by factors that transcend nationally bounded media systems. These include cross border technological systems and transnational media organisations. AI as a technology also acts broadly similar across contexts, at least as regards the fact that overall, AI systems are used to automate tasks which were deemed to be uniquely human (see e.g. Mitchell, 2019) by making predictions, recommendations, or decisions ('OECD AI Principles', n.d.), conditioning human discretionary power in context of their use. Similarly, the capacity for so-called 'hallucinations' is a cross-context feature of foundation models, an inherent result of models inferring and generating content based on patterns learned from the training data. So, it would be reasonable to assume that outlets across contexts react to the technology – and its concomitant challenges – in similar ways. Notwithstanding this, structural imbalances remain, and AI's effects can be highly context dependent. As Arun (2019) argues, potentially negative effects of AI like discrimination, bias, oppression, exclusion, and bad design may have a stronger impact on 'vulnerable populations, especially those without access to human rights law or institutional remedies' and AI systems often exhibit biases against minorities and individuals from non-WEIRD (Western, Educated, Industrialised, Rich, and Democratic) countries, as they typically reflect the inequalities present in their training data – biases which can result in poor output, misrepresentation, and lack of inclusivity at best and outright discrimination or harm at worst (Murgia, 2024).

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

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

their work' (1983, p. 152). Factors leading to normative isomorphism include inter-organisational networks of exchange or the movement of labour between firms.

In the news industry, there is ample evidence that isomorphic processes in the past have occurred as result of all three of these factors. Looking at the pivot to online video news, Kalogeropoulos & Nielsen (2018) found that a mixture of audience demand (coercive), commercial considerations (mimetic), uncertainty about platform businesses' interests and strategies, and uncertainty about the future direction of digital media (coercive, mimetic, normative) led the majority of organisations in their study to 'converge on a similar short, platform and mobile-oriented approach to online news video' with differences 'more clearly related to organisational differences than to country differences' (p. 2221ff.). Christin (2020) and later Petre (2021) also demonstrated forms of mimetic isomorphism in the use of audience metrics. Faced with uncertainty and constraints, publishers across organisation types (Petre) and countries (Christin) adopted audience metrics in broadly similar ways, even though some differences remain due to national and organisational idiosyncrasies. Finally, Simon (2023a) finds that the adoption of platform companies' AI and AI infrastructures follows an isomorphic pattern, with uncertainty about the direction and effects of the technology and the fear of being left behind acting as strong motivators for forms of mimetic isomorphism, talent circulation acting creating normative and mimetic isomorphism, and AI itself acting as a coercive force. Considering the current uncertainty about what AI is, what it can and cannot do for and to the news (Newman, 2023; Simon, 2024), isomorphism can serve as a useful theoretical framework to investigate the adoption and content of news organisations' AI guidelines. Our focus is therefore on examining the following research questions:

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

More specifically:

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

Case Selection, Data, and Methods

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

Sampling of Cases

Recent studies of social media and AI guidelines have been limited by small sample sizes and convenience sampling approaches, relying mainly on guidelines available online. To create a dataset with some meaningful variation that allows for a more general analysis, we took a more systematic approach. First, we identified a set of twelve countries falling into different media system categories (Hallin, 2016) where the existence of at least one AI guideline each was already known as of August 2023. These countries can be grouped into four main geographical regions: Western Europe (Belgium, Germany, the Netherlands, Switzerland, and the United Kingdom), Scandinavia (Finland, Norway, and Sweden), North America (Canada and the United States), and other (Brazil and India). Thus, our sample has a strong focus on Western Europe and North America.

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

Of the 207 organisations, we were able to include 52 AI policies in our study. Seven media companies indicated that their policies were still under development, ten organisations had policies in place but would not share them for academic purposes, and a further eleven companies responded that they had no AI policies. We received no response from 127 contacted media organisations. In the final sample, a total of 33 documents were found online, in eight cases the companies made their policies available to us, and in a further eleven cases we were able to obtain the documents from other sources. This means that we received the documents mainly by means of journalistic research. For example, we were provided some of relevant information by people we knew at these organisations who had access to them but did want to be disclosed as sources. 21 guidelines were available in English, while the remaining 31 documents were translated to English using the neural machine translation service DeepL. Where possible, we verified the accuracy of translations drawing from our own experience (with German, Dutch and French) or with the help of native speakers.

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

Nr.	Name	Country	Organisation type	Source
1	Mediahuis	Belgium	Media group	Online
2	Raad voor de Journalistiek	Belgium	Professional organisation	Online
3	RTBF	Belgium	Public broadcaster	Obtained
4	Nucleo	Brazil	Digital-born media	Online
5	The Globe and Mail	Canada	Legacy newspaper	Online
6	CBC	Canada	Public broadcaster	Online
7	Helsingin Sanomat	Finland	Legacy newspaper	Obtained
8	Suomen Tietotoimisto	Finland	News agency	Obtained
9	Council for Mass Media	Finland	Professional organisation	Online
10	Yle	Finland	Public broadcaster	Obtained

11	T-Online	Germany	Digital-born media	Online
12	Web.de/GMX/1&1	Germany	Digital-born media	Online
13	Frankfurter Allgemeine Zeitung	Germany	Legacy newspaper	Online
14	Rheinische Post	Germany	Legacy newspaper	Provided
15	Süddeutsche Zeitung	Germany	Legacy newspaper	Online
16	Handelsblatt	Germany	Legacy newspaper	Obtained
17	Der Spiegel	Germany	Magazine	Online
18	Ippen	Germany	Media group	Provided
19	Deutsche Presse-Agentur	Germany	News agency	Online
20	Deutscher Journalisten-Verband	Germany	Professional organisation	Online
21	Bayerischer Rundfunk	Germany	Public broadcaster	Online
22	The Quint	India	Digital-born media	Obtained
23	De Volkskrant	Netherlands	Legacy newspaper	Online
24	DPG Media	Netherlands	Media group	Obtained
25	ANP	Netherlands	News agency	Obtained
26	NPO	Netherlands	Public broadcaster	Provided
27	TV2	Norway	Commercial broadcaster	Obtained
28	Dagens Naeringsliv	Norway	Legacy newspaper	Online
29	Schibsted	Norway	Media group	Online
30	NRK	Norway	Public broadcaster	Provided
31	Sveriges Television	Sweden	Commercial broadcaster	Obtained
32	Svenska Dagbladet	Sweden	Legacy newspaper	Online
33	Aftonbladet	Sweden	Legacy newspaper	Online
34	Dagens Nyheter	Sweden	Legacy Newspaper	Provided
35	Journalisten	Sweden	Legacy newspaper	Online
36	Bonnier	Sweden	Media group	Provided
37	TT Nyhetsbyran	Sweden	News agency	Obtained
38	Heidi News	Switzerland	Digital-born media	Online
39	Tamedia	Switzerland	Media group	Online
40	Ringier	Switzerland	Media group	Online
41	SRF	Switzerland	Public broadcaster	Online
42	ITN	United Kingdom	Commercial broadcaster	Provided
43	Financial Times	United Kingdom	Legacy newspaper	Online
44	Reuters	United Kingdom	News agency	Online
45	BBC	United Kingdom	Public broadcaster	Online
46	Business Insider	United States	Digital-born media	Online
47	USA Today	United States	Legacy newspaper	Online
48	The Atlantic	United States	Magazine	Online
49	Wired	United States	Magazine	Online
50	AP	United States	News agency	Provided
51	RTDNA	United States	Professional organisation	Online
52	National Public Radio	United States	Public broadcaster	Online

Qualitative Coding and Quantitative Content Analysis

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

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

This was followed by a first round of deductive qualitative coding, where three coders coded all guidelines for 15 selected formal and thematic characteristics Additionally, we analysed the documents through rigorous quantitative content analysis, focusing on 35 additional formal and thematic categories For the quantitative content analysis, the codebook was tested and refined over two initial rounds of test coding, whereby three coders independently coded a random selection of three guidelines in both rounds to resolve difficulties and misunderstandings. After each round, the results were compared and discussed, and the codebook refined. Once the codebook was set, two coders independently recoded all 52 pieces of content. To measure intercoder reliability, we used Krippendorf's Alpha. The reliability of each guideline's coding was estimated based on 3640 (1820 x 2) independent decisions in the coding process. In 68 cases the coders disagreed. Krippendorff suggests that it 'is customary to require $\alpha \geq .800$. Where tentative conclusions are still acceptable, $\alpha \geq .667$ is the lowest conceivable limit (2004, p. 241).' Krippendorff's Alpha was .94 on average with a range of .73 and 1. Remaining differences in coding were discussed and resolved.

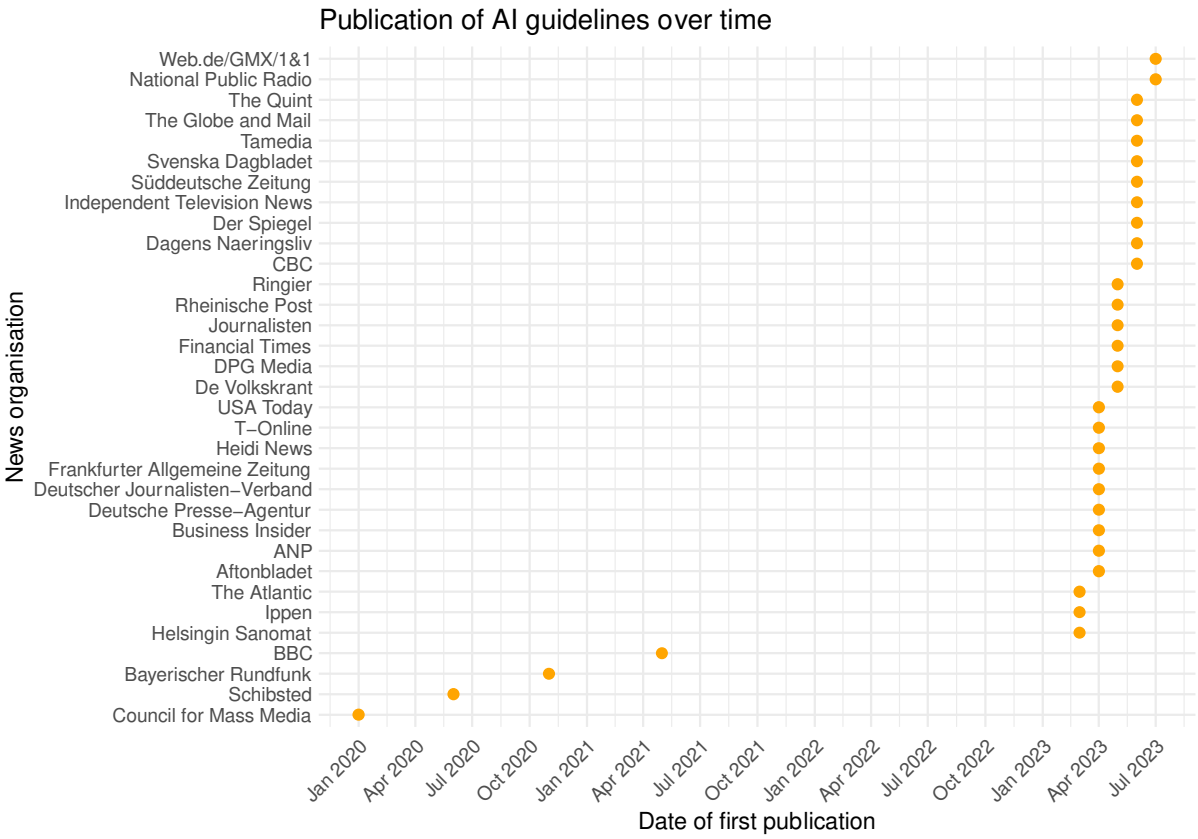
Findings

Formal Characteristics

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

For 33 guidelines, the **month of publication** was available (see Figure 1). The earliest document in our study are the Finnish Press Council's guidelines, published in January 2020, while the latest documents were published in July 2023 by US public broadcaster National Public Radio and the German online news sites web.de/GMX/1&1. The release of ChatGPT in November 2022 is likely to have boosted the development of AI guidelines in the media industry: A total of 33 guidelines with a known release date were published in 2023, but only one in 2021 and three in 2020.

Figure 1: Distribution of AI Guidelines by Date of First Publication, if known (n=33).



The findings from the analysis of **title keywords** (Table 2) reveal a diverse range of terms used to frame AI guidelines. The most common term is 'Guideline,' being used in 16 documents. Other prevalent terms include 'How-to'-phrases and 'Policy' with seven documents each, and 'Principles' (four documents). Less frequently used terms include 'Framework' (two documents) and 'Guide' (one document). Notably, four documents do not have explicit title keywords. Regarding the **remit of the AI guidelines** – stating which part of the news organisation falls under the guidelines and must abide by them – the majority of 36 documents are designed for the newsroom and journalists. Another 15 guidelines are intended for all departments within the news organisation. There is a single instance (where the AI guidelines pertain to the business side only. None of the documents specify other remits, and there are no instances where the remit is not specified.

Table 2: Title Keywords used in the AI Guidelines

Title keyword	**n**
Charter	1
Framework	2
Guidance	1
Guide	1
Guideline	16
How-to	7
Letter	1
Note	3
Policy	7
Position	1

paper	
Principles	4
Statement	1
Other	3
None	4
Total	*52*

The examination of **accountability mechanisms –** the question if AI guidelines will be enforced and compliance controlled in some way – indicates that only four of the documents explicitly mention such mechanisms, while 48 do not. Moreover, the guidelines mostly lack details on how enforcement will occur. Regarding the **intended audience** (which differs from remit as it specifies if the guidelines are meant for internal, external consumption or both), 18 of the guidelines are directed towards internal stakeholders, 15 towards external audiences, and 19 are intended for both internal and external consumption. A total of 38 documents furthermore mention one or several **professional roles** within the guidelines such as 'editor-in-chief' or 'legal staff' for whom the guidelines either apply in specific ways or who serve as points of contact for other people within the organisation.

Finally, on the **dynamization of guidelines** – the question if guidelines will be updated – 33 documents stated that guidelines will be updated, 19 did not mention the same. However, the timing of such updates appears to be an area of varied opinions, with a notable preference for a less rigid and more adaptable approach. Out of the 33 guidelines mentioning dynamization, only two specified a particular interval for updates, with a majority of 31 guidelines leaving the same unspecified.

Thematic Characteristics

Journalistic Values and Conditions for Use of AI

We also analysed guidelines' reference to **journalistic values** drawing on Deuze's classification of journalism's 'occupational ideology' that can be recognised worldwide (2005). These five traits include 'Public Service', 'Objectivity', 'Autonomy', 'Immediacy', and 'Ethics'. Overall, 37 documents mention one or more of these journalistic values, while 15 do not mention any. For **allowed applications** of AI in the journalistic process, 45 documents explicitly state where AI is permitted, while seven do not provide such information. Similarly, in relation to **prohibited applications** of AI in journalism, 35 guidelines specify where AI cannot be deployed, whereas 17 do not mention prohibited applications. In Table 3, we provide additional breakdowns for allowed and prohibited AI applications along the chain of gatekeeping (adapted from Domingo et al., 2008).

Table 3: Allowed and Prohibited AI applications

	Access & observation	**Processing & filtering**	**Distribution**
Yes	23	22	29
Partial	1	1	0
No	2	3	1
Not specified	26	26	22
Total	*52*	*52*	*52*

What is notable is that commercial media organisations' guidelines seem to be more fine-grained and contain significantly more information on permitted and prohibited applications than those by public service or public interest publishers (see table 4).

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

Allowed/prohibited uses	Private	Public	*Total*
Yes/Yes	30	4	*34*
Yes/No	5	6	*11*
No/Yes	0	1	*1*
No/No	4	2	*6*

In 36 cases, guidelines also mentioned potential **pitfalls of AI** that staff should be aware of while 16 did not refer to the same. The three most mentioned pitfalls in AI guidelines were hallucinations, wherein the AI fabricates facts, with e.g., one guideline stating that the organisation takes a 'source-critical approach to AI- generated material' in response. Second, bias of AI models – the tendency to perpetuate existing biases – was frequently mentioned. Finally, some guidelines expressed concerns about copyright and intellectual property, with AI-generated content violating licensing terms, plagiarising existing material, and potentially infringing on intellectual property rights. Looking at the question if **guidelines reference specific AIs**, we found an even split with 26 citing examples (most commonly ChatGPT, DALL-E, and Midjourney), while the remaining 26 did not.

Transparency and Human Supervision

Looking at forms of how to deal with the deployment of AI in the journalistic process, 47 organisations reference **transparency** – the fact that the use of AI has to be disclosed – in their AI guidelines. However, it should be noted that 39 of these do not explicitly specify how this transparency should be communicated, as is evident from table 5.

Table 5: How to Communicate Transparency

	n
Byline	2
Endnote	3
Text box	1
Register entry	2
Not specified	39
Total	*47*

When organisations reference transparency, we see further variation on when and where disclosure must happen. A few outlets are very prescriptive and detailed, with one outlet, for example, writing that 'the editorial team shall indicate when a news item or part of the information offering has been produced wholly or partly on the basis of automated processes and, as far as possible, refer to the sources on which the news item is based,' before listing examples. Many are less specific with one recommending that AI use is labelled when AI 'is used as more than a mere aid,' but leaving this at the discretion of staff.

When it came to **human supervision** of AI (sometimes referred to as 'human in the loop') – where humans maintain control and responsibility over the tasks performed by AI systems and review any output produced by the same – 44 organisations stipulated supervision in some form. Still, table 6 shows that news organisations have no unanimous way of handling human supervision.

Table 6: Human Supervision

Area of supervision	Text/Product	Algorithm
Anytime	34	9
Sometimes	5	5
Never	0	38
Not specified	13	0
Total	*52*	*52*

Responsible AI in Journalism

Looking, next, at three specific forms of responsible AI – concern for **data privacy, source protection, and algorithmic bias** – we find a somewhat heterogenous picture as table 7 shows.

Table 7: Elements of Responsible AI

Reference to...	Yes	No	*Total*
... data privacy	28	24	*52*
... algorithmic bias	19	33	*52*
... source protection	28	24	*52*

The qualitative data demonstrates that many guidelines emphasise the protection of vulnerable groups and contributors' privacy, urging against uploading or using confidential or sensitive information in AI engines. Source protection is a recurring theme, with guidelines ensuring that AI platforms are not given access to sensitive, source-protected, or unpublished information, with one organisation for example writing that 'we protect the privacy of sources and do not share sensitive material or personal data.' For algorithmic bias, those guidelines that mention it prohibiting the use of AI that could lead to the 'discriminat[ion] against any individual or group based on race, ethnicity, religion, gender, sexual orientation, or any other characteristic' is a recurring theme.

Cooperation and Dependency

Internal cooperation on AI between different departments within news organisations was present in 19 cases. Organisations mentioned that they had 'several teams across departments studying AI' or outlined how AI was a topic for 'legal, tech, finance, HR' and all other

departments. In terms of **external cooperation** with e.g., technology companies, consultants, researchers, or governments, nine guidelines mention the same. Finally, on **dependency**, only 5 of the surveyed news organisations' guidelines make any reference to possible dependencies on platform companies or other technology companies when it comes to the development and deployment of AI. One news organisation, for example stresses the importance of 'independence […] not only from political but also from technical influences' while another argues that 'greater independence from commercial big-tech providers is desirable.' The majority of 47 documents, however, do not make any reference to dependency.

Organisational and National Characteristics

The limited scope of the sample precludes a thorough statistical examination of organisational and national characteristics; nonetheless, we present findings that point to characteristics unique to some countries and the organisation type. Due to the number of variables, we do not present tables with results here. These can be found in the appendix.

A first *difference seems to emerge mainly between publicly funded and commercial publishers*. Commercial media organisations' guidelines seem to be more fine-grained and contain significantly more information on permitted and prohibited applications (see Appendix, Table 3). For example, the protection of sources, which plays a role especially when sensitive information is entered into the interface of LLMs, is emphasised above all by commercial broadcasters and legacy newspapers (see Appendix, Table 4). Commercial media also make more statements about possible pitfalls of AI (see Appendix, Table 5). Where public media differ is the human control of algorithms; they seem to put a stronger emphasis on this topic than private-sector actors (see Appendix, Table 6 and 7). Commercial media are somewhat more permissive when it comes to the use of AI than their publicly financed or public-service oriented counterparts (see Appendix, Table 8). This seems especially true for news agencies which allow AI to be used across most levels of the journalistic process much more than the average (see Appendix, Table 9). No clear picture emerges for journalistic values (see Appendix, Table 10).

The data also showed *some variance across different countries*. A set of four countries refers to journalistic values more often than others: Belgium, Canada, the United Kingdom, and Germany (see Appendix, Table 11). Guidelines from Belgium and Finland allow for AI use more often than average on all three levels of the journalistic process (see Appendix, Table 12). Possible pitfalls of AI are most often mentioned by organisations in Canada, Norway, and the United Kingdom (see Appendix, Table 13). While many organisations make statements about transparency and human oversight, organisations in Canada, the Netherlands, Switzerland, and the United Kingdom are significantly above average (see Appendix, Table 14). When it comes to elements of Responsible AI (see Appendix, Table 15), organisations in Canada, the United Kingdom, Netherlands, and Germany have a particularly strong emphasis on data privacy in their guidelines. Algorithmic bias is covered most often by organisations in Western Europe, especially in the United Kingdom, the Netherlands, and Switzerland. Source protection, on the other hand, is mainly a topic for Scandinavian countries, although outlets in Canada and the United States also mention this more often than average.

Discussion

Turning to the research questions, the overall picture that emerges provides evidence for isomorphic tendencies leading to homogeneity (*RQ0*), but within bounds.

The quantitative content analysis results show homogeneity for almost two thirds of the variables (assuming a threshold of >60% in overlap for homogeneity). On the *formal level*, a majority of governs the editorial realm of journalists and the newsroom (36 of 52 organisations), mentions specific professional roles as relevant stakeholders (n=38), states that the guidelines should be updated at some point (n=33), but also lacks any reference to accountability mechanisms (n=48). Regarding the *thematic features*, our coding again shows general patterns across publishers although the degree of isomorphism varies between various categories. For example, a reference to journalistic values in general can be seen comparatively regularly across guidelines, with 37 of 52 news organisations referring to journalistic values in general, although there was variation within this broad category with 'trust' (n=24) and 'accuracy' (n=23) named most often when it came to individual values. It is also common that AI guidelines cover at least some forms of allowed or prohibited applications, with more news outlets mentioning allowed (n=45) than prohibited ones (n=35). A majority of 36 news organisations refers to possible pitfalls that can result from using AI in journalism. The documents were also quite homogenous in dealing with transparency and human supervision of AI-generated content exhibiting rather high levels of convergence. A total of 47 news outlets refer to transparency, although most do not specify how to communicate the same, and 44 guidelines stress the importance of human supervision, although such oversight is mostly applied to text generated or otherwise edited by AI and only 34 organisations require human supervision at all times. While some difference remains, due to the distinct requirements of media organisations and the early stage of AI guideline development, the overall similarity across guidelines is striking, especially compared to the lack of similarity research has uncovered in social media guidelines.

Turning to more specific research questions (*RQ2a* and *RQ2b*), national and organisational idiosyncrasies continue to shape publishers' practices within what seems to be an overall trend towards homogeneity. While the small sample size does not allow for rigorous statistical analysis and means that these cursory results must be interpreted with caution, we can see some variance across organisational types (commercial vs. public service) and country when looking 'under the hood'. We found that differences seems to emerge mainly between publicly funded and commercial publishers—not surprising given that these organisations have different mandates and motives. What was surprising is that publicly funded broadcasters – often expected to have a heightened sensitivity to ethical considerations in comparison to privately funded media outlets – did not establish a 'stricter ethical regime' around AI in our sample. Considering the variance across countries, differing approaches to technology policy and regulation, levels of investment in AI research and development, and national debates on privacy and data protection and press freedom all might contribute to the variance we could see. But again, our small and uneven sample makes a more in-depth analysis of these features difficult, but these cursory results point to some variation across media systems and between organisational types which merits further exploration.

The analysis of current AI guidelines within news organisations also revealed *several blind spots (RQ3)*. First, the vast majority of guidelines we analysed are essentially toothless regarding enforcement of violations or broader oversight of what they stipulate. Similarly, while many organisations demand the supervision of output, oversight over algorithms and technical systems seems limited. A third notable absence are explicit directives regarding external collaborations, e.g., with technology vendors, researchers, or other stakeholders. Given the increasing reliance on external expertise in the development and deployment of AI, guidelines could include provisions for transparent and ethical engagement with such actors. Most AI guidelines also did not address questions of technological dependency, a factor that

holds implications for the autonomy of news organisations (Simon, 2022). Few discussed safeguarding editorial independence and self-reliance when it came to AI. Likewise, few organisations specified if and when their guidelines would be updated, a noteworthy omission considering the fast-moving nature of the field.

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

Limitations

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

Second, the study encountered restrictions in accessing guidelines from certain organisations. For one, some organisations have more extensive internal guidelines that in some but not all cases were beyond our purview. Some publishers acknowledged having or working on guidelines but were unwilling to share them. From background conversations we learned that often this could be attributed to concerns surrounding divulging proprietary strategies and thus potentially losing a competitive advantage. Some were also concerned about looking amateurish vis-à-vis their peers if they released guidelines too early.

Third our analysis examines the outcome – homogeneity – of a process that has likely already occurred (though it is likely to be still ongoing at the time of writing). While we can assume that an isomorphic process has transpired and can elaborate on potential driving factors), we cannot establish causality or definitively prove that this has been the case.

Conclusion

Institutional isomorphism offers plausible explanations for our observations. DiMaggio & Powell contend that ‘the greater the extent to which technologies are uncertain or goals are ambiguous within a field, the greater the rate of isomorphic change’ (1983, p. 156). This certainly holds true for the current state of AI in journalism. The uncertainty surrounding the trajectory of the technology is significant and many organisations are grappling with defining their goals for AI. Moreover, the more ambiguous AI’s nature, what it could enable, and what should crucially be done about it, the more likely organisations will emulate successful entities that preceded them. Certain guidelines, such as those of the BBC

and Bayerischer Rundfunk, which have gained widespread attention through industry publications and conferences, have served as an important inspiration for others.[1] Additional predictors of isomorphism include the strong professionalism evident in journalism, both nationally and globally. Journalism is becoming more internationally connected, facilitated by digital media, the exchange of labour, and collaborations among major players. In the AI domain, the core community working on it remains relatively small, and initiatives like the London School of Economics' Journalism AI initiative provide vital platforms for idea exchange. Both could have contributed to similar patterns emerging in the guidelines of international news organisations. However, while we observed a trend towards isomorphic convergence, it is important to recognise that different newsroom cultures and national contexts still seem to lead to significant variations in how AI guidelines emphasise, for example, individual journalistic values or the need for human supervision. This suggests that institutional isomorphism, while present at a macro-level, does not entirely erase the influence of national, sectoral, and organisational differences. Looking to past research, publishers' differing institutional arrangements, as well as their agency and strategic priorities in particular (Sehl et al., 2021) are likely to a play a substantial role in determining how individually different AI guidelines – and broader approaches to AI – come about.

Ultimately, it should not be forgotten that both the race to AI and the establishment of AI guidelines are also a quest for legitimacy. Formulating an AI policy—one that resembles those of successful organisations and accedes to common demands on how AI should be used and regulated—also functions as a form of signalling. This, of course, ultimately raises the point who and what AI guidelines are really for—are they a mere PR exercise, dressed up in form of a policy or a meaningful contribution to regulating a technology in the face of uncertainty. Publicly, at least, many organisations assert that their motivation behind formulating such guidelines stems from the dynamic nature of the environment in which they operate, with guidelines intended to serve as an initial framework, offering a sense of security to staff, readers, and partners. Many seem to have emerged in response to both internal calls for direction and a perceived need to address external demands. Establishing legitimacy is part of the answer, not the whole story.

Lastly, isomorphism theory argues that a field's dependence on a single source leads to greater isomorphism. Where DiMaggio & Powell referred to a 'single source of support for vital resources' (1983, p. 155) and resource centralisation, AI, as a large technological system (Simon, 2023), comes into play. One does not have to fully embrace technological determinism to assume that AI has a shaping power of its own. It thus acts as a coercive force with broadly similar effects across contexts, resulting in analogous reactions, including in the development of AI guidelines.

Naturally, the question of alternative explanations arises. And indeed, the adoption of AI guidelines in journalism can be understood not merely as a response to institutional pressures for conformity but also as a result of a complex negotiation between the technological capabilities of AI, the values and norms of journalistic practice, and the broader societal implications of AI deployment. Journalism's core values, such as accuracy, independence, and transparency are shared across many media systems (even though the specific ways they are interpreted and applied can vary) (see, e.g. Hovden, 2023), and it is therefore only natural to assume that organisations in different countries would develop similar AI policies reflecting these values, aiming to harness AI's capabilities while trying to uphold journalistic standards. Likewise, concerns over issues like privacy, transparency, and the effects of algorithms are shared across many countries (Araujo et al., 2023) and should be

[1] This finding has emerged in ongoing fieldwork of one of the authors.

expected to shape how news organisations think about and address the same when it comes to the development of their AI practices. Further research will be needed to establish if such factors are more important in explaining some of the similarities we see in AI guidelines, or if isomorphic tendencies are the better explanation. A second point pertains to the shaping effects of media different media systems. National idiosyncrasies matter for publishers' practices. Different, country-specific economic and competitive pressures on journalism differently shape the constraints and possibilities news organisations and news workers experience in their work. We found some variation across different countries but were not able to explicate this due to the limited sample size. As more organisations establish and publish AI guidelines, it will be useful to reassess the findings from this study with fresh data. This also concerns a third point, namely that isomorphic convergence is a process, not a state. Our study provides a snapshot at a specific moment in time, and one should remember that the AI guidelines studied here are early examples, often developed quickly in response to the launch of ChatGPT and due to concerns about the speed with which generative AI became accessible to the public and journalists. For now, we can see that there are some overlapping trends among AI guidelines but also a considerable degree of variety. Not only do we withhold judgment at this point if this is to be celebrated or rectified from a normative perspective, but we also leave open if the convergence we observe here is bound to continue, stall, or even revert. Only further research will be able to address this point.

Future questions abound. For one, AI guidelines often emerge from internal consultation processes that involve various departments, sometimes building upon pre-existing materials. One question here will be which 'tribes' – editorial, business, tech – within news organisations will exert dominance in shaping the ideas and logics embedded in these guidelines. A second line of inquiry pertains to what kinds of organisations release or craft both internal and external AI guidelines, for what reason, and how these differ. A major question will also be how exactly such guidelines will be implemented and how effective they will prove to be in achieving more 'responsible AI'. Finally, against the backdrop of industry efforts to develop a set of principles, rights, and obligations regarding the use of AI-based systems, will we have more standardisation and homogeneity, or will we see more customisation in the future? For now, publishers seem to embark on this journey from somewhat similar points.

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