



FINAL REPORT -APPLIED RESEARCH PROJECT

7 July 2023

NATIONAL
PROTECTION
FRAMEWORKS AND
MECHANISMS FOR
THE SAFETY OF
JOURNALISTS

In collaboration with
The Office of the United
Nations High Commissioner
for Human Rights (OHCHR)

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Executive Summary

The following report aims to map existing national protection mechanisms for the safety of journalists found around the world. After over ten years in operation for the UN Plan of Action on Safety of Journalists and the Issue of Impunity, this report seeks to identify the good practices and patterns which can be drawn from existing frameworks that align themselves with this global commitment to safeguarding journalists.

Throughout the report, 59 different mechanisms, which were identified in 39 different countries across all the continents, are discussed. This includes brief evaluations of these mechanisms, how they came to be, how they operate and how they are effective. Through this process, an understanding is built regarding the key aspects of efficient safety mechanisms, such as the various actors which are involved, the nature of the response to different threats encountered by journalists and how the security of journalists can be approached in different ways.

The main conclusions of this report are drawn from what is learnt about the prevention, protection and prosecution aspect of protecting journalists. Indeed, these three pillars allow for a comprehensive strategy towards creating a safer environment for journalists. The key takeaways related to the efficiency of these pillars are:

- I. Prevention mechanisms benefit from multi-stakeholder approaches which allow for a range of expertise to be considered and applied in order to construct mechanisms which will create favorable environments for journalists.
- II. Protection mechanisms must be adapted to the particular context of a country in order to best address the varying nature of the threats or harms which journalists encounter.
- III. Prosecution mechanisms are key to combating impunity and require a strong willingness from the government and an understanding of the importance of journalists, their work and their rights.

Introduction

In 2022, the UN Plan of Action on Safety of Journalists and the Issue of Impunity, hereby referred to as 'the Plan' or 'the Plan of Action', marked its 10th anniversary. The Plan is composed of over 100 action lines which aim to protect journalist safety and combat crimes conducted against them (Pukallus & Harrison, 2015), by encouraging the conception and amelioration of more comprehensive national frameworks focused on the safety of journalists (OHCHR, 2022). It is built around three key pillars: prevention, protection and prosecution. The pillar of prevention encompasses mechanisms which operate before an attack and seek to reduce the risk of these attacks. This includes creating an enabling environment, awareness raising and capacity building. Protection mechanisms include any frameworks which can be applied when an attack is threatened or carried out. As such, they can include mechanisms which reduce the risk of attacks, repair harms and enable journalists to continue working in a safe environment. Finally, prosecution concerns itself with the mechanisms that bring the perpetrators of crimes against journalists to justice in order to combat impunity and thus prevent further violence (OHCHR, 2017). It is important to highlight that these pillars are interdependent and mutually reinforce one another.

At this point it is also important to define journalists. A report by the UN General Assembly defines journalists as "individuals who are dedicated to investigating, analysing, and disseminating information [...] through any type of written media, broadcast media (television or radio) or electronic media. With the advent of new forms of communication, journalism has extended into new areas, including citizen journalism" (as cited in UNESCO, 2021c: 115). As such, "professional full-time reporters and analysts, as well as bloggers and others who engage in forms of self-publication in print, on the internet or elsewhere" are included in the definition of journalist (United Nations Human Rights Committee, 2011: 11).

The need for such a global commitment to the safety of journalists is evident as, between 1993 and July 2023, 1,602 journalists have been killed worldwide (UNESCO, 2023c), a figure which does not include the many more that are abused, threatened, intimidated and harassed every year (UNESCO, 2021a). Unfortunately, the Covid-19 pandemic has been a trigger for the exacerbation of an already deteriorating global situation for the protection of the freedom and safety of journalists (Smyth, 2020). UNESCO (2022) estimates that over the last five years, 85% of the global population has seen a decrease in press freedom in their country. These alarming figures indicate the continued need for efforts to protect journalists, such as those in the Plan of Action, which has been instrumental in creating a common language and framework for states and civil society regarding journalist safety and impunity (International Media Support (IMS), 2017), and has reinforced the role of States and the international community in the creation of a safe environment for journalists (Horsley & Harrison, 2013; IMS, 2017).

When it comes to monitoring the steps taken by States and other actors to create national safety mechanisms, there is an insufficient mapping of existing national frameworks aimed at securing the safety of journalists on a global scale (Canela, 2022). This report aims to respond to this gap in order to facilitate greater coordination and knowledge sharing. Therefore, it presents an extensive, but not exhaustive, list of national safety mechanisms for journalists. To do so, this report will include only *national* safety mechanisms.¹ Additionally, the focus will be on highlighting mechanisms which demonstrate good practices, meaning that they demonstrate positive initiatives by States, an adequate recognition of the rights and the importance of journalists and yield improvements for the situations of journalists.²

This report will proceed in seven different sub-sections, where national mechanisms will be grouped according to their core 'approaches' to securing journalist safety. These approaches were provided by our partner at the OHCHR and are used to ensure that mechanisms found within this report are varied and relevant. The following approaches will be included: I. country specific approaches, II. participatory approaches, III. strong political approaches, IV. human rights based approaches, V. gender based approaches, VI. strategic approaches and VII. grounded approaches. Within each of these subsections, mechanisms will be discussed by region, which within this report will be defined on a continental basis. The aims of these sections will be to describe and briefly evaluate the mechanisms which have been identified for these approaches, with a concise analysis of the approach at the end of each section. This report will conclude by discussing the patterns identified through this research as related to the three pillars of the Plan of Action.

Methodology

The findings of this report have been accumulated through thorough desk research, which reviewed various websites, articles, legislations and reports in order to identify a list of national protection mechanisms that is varied and as regionally balanced as possible. Some of the principal sources of information include reports by UNESCO, the Council of Europe, ARTICLE 19 and the OHCHR. Mechanisms were chosen for the report based on their evidence of qualifying as 'good practices'. Therefore, their selection hinged on evidence of the mechanisms being in operation, engaging relatively actively in issues related to journalist safety and the realization of positive results for journalists in those countries.

Several of the sources of information were available in different languages, often those native to the country of that mechanism. Indeed, throughout the research process, it

¹ There are many interesting regional and international mechanisms working towards the safety of journalists, such as the Council of Europe or the African Commission on Human and Peoples' Rights. These will however not be the focus of this report as the aim is to map national mechanisms.

² This report is a part of the Geneva Graduate Insititute's Applied Research Project, as commissioned by the Office of the High Commissioner for Human Rights, and has been undertaken between February and July of 2023 by three Masters students in International and Development Studies.

became clear that searching for mechanisms in these different languages could provide better results and information. As such, an effort was made to search for more information on these mechanisms in their original language, using online translation tools to understand these sources when the languages fell outside of the expertise of the research team.

The approaches which were listed above have served as guidelines for the research.³ These approaches have been selected as they highlight some of the principal ways in which frameworks for journalists' safety can be created. They also allow for patterns to be identified regarding how the safety of journalists is undertaken, similarities or differences related to the types of mechanisms within each approach and regional trends. However, it is important to note that these approaches naturally overlap with one another and therefore one should not consider that a mechanism within one specific approach is exclusive only to that approach. Mechanisms were attributed to a specific approach based on the level of relevance and the distinguishable elements of that mechanism.

Furthermore, within each approach, mechanisms are divided regionally. The research process focused intently on creating a regional balance of national mechanisms which are included in the report, in order to map a truly global image of the situation for the safety of journalists. This will also allow for the identification of trends or gaps in different regions.

Additionally, throughout the report, particular attention is paid to the three pillars of prevention, protection and prosecution of the UN Plan of Action, as the aim of this report is also to track the impact of this Plan after over a decade in action.

Limitations

At this point it is important to highlight the limitations of this report. First and foremost, the following report is not an exhaustive list of all existing safety mechanisms. This is due to a combination of factors including time constraints, difficulties of accessing resources and uncovering mechanisms, language barriers and resource limitations. As a result, the following report provides a snapshot of safety mechanisms available globally to journalists. These challenges described here were also encountered when attempting to create a regional balance throughout the report.

Additionally, the relevance or updated nature of the information cannot always be guaranteed due to challenges in accessing new information for some of these mechanisms. This in itself is an interesting challenge which will be discussed in the conclusion of this report. It was also difficult to find relevant information which provided an evaluation or criticism of identified mechanisms. As a result, it was sometimes difficult to determine the extent to which some of these mechanisms were truly 'good practices'.

³ These approaches will be further defined within each of their respective sub-sections.

Finally, on a structural level, there were some instances where the differentiation between certain approaches was unclear. For example, strong similarities were identified between the participatory approach and the grounded approach. As such, mechanisms were divided in the most suitable way possible but, as previously mentioned, these approaches naturally overlap and thus some mechanisms could be assigned to various different approaches.

I. Country Specific Approaches

This section will discuss country specific approaches to ensuring the safety of journalists. This will entail looking at mechanisms that are tailored to a specific country and which address the particular threats that journalists encounter in that context.

Protection Mechanisms in Latin America

Journalists in many Latin American countries find themselves vulnerable due to their profession, a trend which can be attributed to a broader context of structural violence in the region (Monzón & Santa Cruz, 2023b), attitudes towards journalists and corruption. However, some countries have adopted safety mechanisms for journalists which have improved conditions for journalists. In particular, these mechanisms in the region stand out for their focus on addressing the physical security of journalists and providing rapid response services, the details of which are described below.⁴

Colombia

In 2000, the Colombian government implemented the National Unit for Protection (UNP) as a response to internal and external pressure regarding the safety of journalists in the country at the time. The first of its kind, this Unit was put in place in a context of a complex extended conflict between multiple groups within the country. The UNP is well established and operates across the country. It receives cases, often submitted by journalists, and offers appropriate protection mechanisms once the nature of the threat has been analyzed. Protection measures can include bullet proof vests or vehicles, bodyguards, emergency evacuations or mobile phones (Inkinen et al., 2017; Lobo-Guerrero, 2016). Over 150 journalists have been protected under the UNP, and the program is generally commended for its positive results in reducing journalist killings (Lobo-Guerrero, 2016).

Mexico

A similar mechanism can be found in Mexico, which is considered to be the most dangerous country not currently involved in an armed conflict for journalists (RSF, 2022a). While many officials in the country allege that the high death toll and crime rate against journalists is simply an extension of the general violence in the country, civil society operating in Mexico suggest that this is a more targeted, political violence against journalists (Bartman, 2018). As an effort to combat this particularly high level of violence, the Mexican Congress, following growing pressure by civil society, passed the Law for the Protection of Human Rights Defenders and Journalists in 2012. This law mandated the subsequent implementation of the Protection Mechanism for Human Rights Defenders and Journalists (RSF, 2022a; Joloy, 2013). The Mechanism aims to secure the physical,

⁴ Outside of Latin America, similar protection mechanisms include the Central Bureau of Inter-Forces for Personal Security in Italy (Council of Europe, 2020).

psychological and economic safety of journalists and their families through the provision of physical security mechanisms, such as bulletproof vests, armored vehicles, panic buttons and security cameras. Journalists can request to receive this protection and must demonstrate their need for it based on their work and evidence of threats. As of August 2022, 555 journalists are under the protection of this mechanism (RSF, 2022a). Moreover, the Law is particularly notable as it specifically intends to prevent attacks against journalists, by aiming to change the structural circumstances which have led to the high level of risk for journalists (Joloy, 2013).

Legal Aid in Asia

Indonesia

The specific geographical composition of Indonesia, with its more than 13,000 islands, creates great variation in infrastructure in the country (Inkinen et al., 2017). LBH Pers (Legal Aid Institute for the Press) is an NGO created in 2003 which has a mission to protect democratic society through ensuring freedom of the press and of expression. To tackle the discrepancies encountered by journalists in different areas, LBH Pers has nine offices across the country. It provides legal assistance for between 30 and 40 cases each year to journalists facing issues such as criminal charges or civil suits. Additionally, it provides training programmes on press laws and the importance of press freedom to police, prosecutors and lawyers, amongst others, throughout the country (Inkinen et al., 2017; Lembaga Bantuan Hukum Pers, 2017).

Europe

Sweden

In 2018, the Swedish government published its National Action Plan to Safeguard Freedom of Expression, effectively affirming its commitment to protect the safety of journalists, as well as artists and elected representatives. According to this Plan, in order to protect democratic discourse, "society needs both wide-ranging efforts to strengthen democracy and targeted measures to prevent threats and hatred against the key actors" (Government Offices of Sweden, 2018: 5). The Plan consists firstly of an investigation and evaluation into the present situation and challenges for journalists, including polarization, digital development and high levels of harassment for women journalists. It is then accompanied by an underlining of existing measures and new initiatives to improve conditions for journalists in the aim of creating a foundation for work which is more systematic (Government Offices of Sweden, 2018).

Ukraine

Journalists in Ukraine have been significantly impacted by the war, which has transformed many journalists into war correspondents out of necessity. In total, 15 journalists have been

killed during the course of the war, 13 of which died in relation to their work, with many more having been injured or facing mental health problems (Westcott, 2023). In 2022, the National Union of Journalists of Ukraine (NUJU) opened the Journalists' Solidarity Centers in response to requests by media workers, in order to provide journalists with legal, psychological, organizational and technical support (International Federation of Journalists, 2022; NUJU, 2023). Over 2,000 journalists have benefited from their services, which include the provision of professional equipment, financial support and grants (NUJU, 2023). Similar mechanisms include the 2402 Fund founded by local journalists (2404 Fund, 2022).

Investigative Mechanisms Malta

Following the murder of Daphne Caruana Galizia in 2017, the Government of Malta launched a Public Inquiry into the case, becoming the first country in the world to do so as a response to a journalist assassination. It was determined that while a simple criminal inquiry would have brought justice, it would not have resolved the enabling circumstances that led to this assassination and thus would not have created any change in the safety of journalists in the country. The Public Inquiry found that the State was responsible for allowing impunity, which thus created a failure to realize the danger to Galizia's life and take preventative measures to protect her. The Board of the Inquiry also made a series of recommendations, including addressing corruption, strengthening the protection of journalists, making constitutional reforms and revising laws which enable Strategic Lawsuits Against Public Participation (SLAPPs). It therefore represents a positive and proactive approach to the protection of journalists and the prevention of future harms towards them. However, in order to be truly effective, the recommendations must be implemented by the State in good faith, with a lack of noticeable progress so far (ARTICLE 19 Europe, 2022b).

Serbia

A similar mechanism can be observed in Serbia with the Commission for Investigating Murders of Journalists, established in 2013 by well-known local journalist Veran Matić. Made up of journalists, journalists associations, police representatives and the State Security Agency, this mechanism tracks violence or threats against journalists and ensures that unsolved cases are addressed (Kilman, 2017). This mechanism takes a prosecutorial approach to combating impunity by investigating the unsolved murders of reporters. So far, it has focused primarily on three cases, those of Dada Vujasinovic, Slavko Curuvija and Milan Pantić (Barlovac, 2013). It has been successful in combating impunity, by achieving criminal charges for the murder of Slavko Ćuruvija in 1999. Also in its fight against impunity, it has educated prosecutors, police and judges on journalists, their importance and their rights (Kilman, 2017).

Analysis

These mechanisms are adapted to be the most effective for the set of issues which journalists in one country may experience. This means that they vary greatly in nature, with some of these frameworks being designed for rapid response, while others undertake a more structural, systematic approach to safeguarding journalists. As the name of this approach suggests, it is important to consider that these mechanisms are specific to each country and thus may be difficult to transplant from one country to another. However, as can be seen in Latin America, countries with similar contextual issues can adapt other country specific mechanisms to their own situations. This must be carefully considered as not all mechanisms will be applicable to a country's social, political and economic environment or circumstances.

Despite this caveat, the importance of tailoring mechanisms to the specific contexts of a country is significant. Indeed, journalists in different countries do not experience the same types or levels of threats or harms. Additionally, certain solutions to these harms may not always be possible or impactful from one country to another. As such, it is beneficial for a safety mechanism to be adapted to the particular experiences and needs of journalists within a country in order to more effectively safeguard them.

II. Strong Political Approach

Strong political approaches entail safety mechanisms which demonstrate a clear political commitment to journalist safety in a country, a public recognition of their role in society and thus an acknowledgement of the importance of safeguarding their rights. This also encompasses the support by the State of media organizations and civil society groups that are working towards journalist safety.

Asia

Pakistan

The Sindh Protection of Journalists and Other Media Practitioner Act was passed in 2021, ensuring that effective steps are taken towards every journalist and media practitioner's right to life and security under Article 9 of the Constitution of Pakistan. It was drafted in consultations with different representatives such as journalists and human rights groups, with the aim of ensuring effective measures for the protection of journalists against violence, intimidation and harassment. It also aims to develop and implement effective strategies to combat impunity by monitoring and investigating cases reported by journalists and other actors(Tunio, 2021). Additionally, the House passed an amendment which would

bear the expenses of legal protection of journalists. This Act also requires adequate insurance and training by the employers to media workers who might be at risk (IFJ, 2021).

Tamil Nadu (India)

The government of the Indian state Tamil Nadu established the Journalists Welfare Board, composed of representatives from various state departments, to work on the overall welfare of journalists in the state. This mechanism covers a wide range of welfare schemes, including journalists' family pensions and benefit funds, housing sites for journalists, free press cards and bus passes (Sivapriyan, 2022). The information and public relations department provides post retirement and monthly pensions to indigent journalists, the latter of which have benefited 218 journalists (Information and Public Relations Department, 2021). Furthermore, the Board holds workshops for journalists to enhance their skills in order to compete in the current media industry (Express News Service, 2023).

Philippines

The Presidential Task Force on Media Security, created in 2016, is composed of heads from various departments and other governmental agencies to specifically address the issue of violence against media workers in the country. In 2018, it collaborated with the Asian Institute of Journalism and Communication (AIJC) to create a database for violations against journalists in the country. Following an incident where a journalist was harassed on Facebook, it ensured that those threats were taken down and eventually discussed a long-term collaboration with Facebook to implement measures to neutralize and counter the proliferation of social media accounts that target journalists for their work. It continues to build and strengthen partnerships at a local and international level (Egco, 2020).

Europe

Portugal

The government of Portugal, through a joint proposal by the Socialist Party and Left Bloc, amended the Article 132 of the country's criminal code, thus reinforcing legal and criminal protections for media personnel. The amended legislation adds journalists to the category of 'protected' persons, which includes for example judges or security personnel. As such, under this amendment, offenses such as threats or constraints against journalists are considered to be serious crimes, equal with murder or physical violence. It is therefore an important step in recognizing the threats against journalists (RSF, 2022b) and demonstrates a strong initiative towards the protection of journalists.

United Kingdom

The National Action Plan for the Safety of Journalists, established in 2020, is endorsed by the National Committee for the Safety of Journalists and aims to protect journalists from abuse and harassment. It brings together various stakeholders including law enforcement,

broadcasters, publishers, and government officials with the goal of increasing awareness regarding the safety challenges faced by journalists. The Plan focuses on addressing issues ranging from understanding the root causes of the problem, enhancing the criminal justice response in order to combat impunity, building personal safety resources, collaborating with online platforms to tackle online abuse and improving the public recognition of the value of journalists (GOV.UK, 2021).

Latin America

Paraguay

In 2017, the Roundtable for the Safety of Journalists was created following recommendations by UNESCO and a commitment by the Executive, Legislative and Judicial branch of the State of Paraguay in the 2016 Letter of Intent, which was agreed upon in order to promote the UN Plan of Action in the country. Local journalist associations make up this Round Table, as well as several governmental bodies and Ministries. While this mechanism does encounter some difficulties related to its budget and stability related to staff members, it has been able to raise awareness about the issue of journalist safety, prevent violence against journalists and create safety protocols (Monzon & Santa Cruz, 2023b).

North America

Legal Protections in the United States of America

The Department of Justice in 2021 announced the Protect Reporters from Exploitative State Spying (PRESS) Act, which seeks to prevent federal prosecutors from seizing journalists' information. It inhibits federal law enforcement agencies from subpoening journalists' records and protects journalists from being forced to reveal information about their sources (Allen, 2022). The legislation was passed unanimously in the House Judiciary Committee in 2022 (Raskin House, 2022).

Analysis

Strong political support is an essential component for addressing safety issues against journalists. Willingness from the government is a key aspect to ensuring the effective facilitation of any initiatives by the government or to their support for programmes which address the issue. Such support can include identifying the problems associated with journalism and ensuring the provision of legal protections, addressing digital safety through collaborations with various non-state actors and raising awareness on the importance of journalistic work in the society but not only limited to this. However, it is vital to ensure by the governments that the laws implemented do not hinder journalists' work directly or indirectly.

This approach is highly interesting and particular when one considers that in some contexts, injustice or harm against journalists can be perpetrated either directly or indirectly by political officials or actors in positions of power. For example, politicians have contributed to the stigmatization of journalists and their work. As such, strong political approaches are important to countering these causes of harm and ensuring that the profession of journalism, and the journalists themselves, are respected and defended.

To ensure the sustainability of journalistic protection, it is crucial that laws focused on safeguarding journalists are integrated in the culture of the country rather than solely relying on the incumbent government. Here, the initiative by Paraguay, which includes the three core branches of government, can be a role model for all the countries in ensuring the participation of all relevant actors towards creating a conducive environment for journalism and integrating commitments to journalist safety throughout political structures.

III. Participatory Approach

Included in this section are mechanisms which are designed in consultation and in collaboration with important actors such as, but not limited to, law enforcement, state departments, non-governmental organizations or unions. Here, the initiatives are formed to address the issue of journalists' safety through consultations with different stakeholders including journalists community. It also ensures the participation of all these stakeholders in the working of the programme/initiative.

Latin America

Brazil

Following an escalation of violence against journalists during the presidency of Jair Bolsonaro, the government of Brazil has launched the National Observatory of Violence Against Journalists under the Ministry of Justice to monitor cases of attacks against journalists, mobilize competent bodies to curb aggression and identify and hold accountable perpetrators. This marks an encouraging step forward for the reparation of the conditions for journalists in the country, as authorities bring monitoring and accountability measures into their public policy work (de Assis, 2023). In addition, a delegate will be appointed by the general directorate of the civil police of the federal district to handle cases of aggression against journalists to protect and promote their privacy without risking future reprisals. Moreover, its collaboration with Reporters Without Borders will ensure the creation of a single database on cases of violence against the media in Brazil (RSF, 2023).

Africa

Capacity Building Programmes for Varying Actors Ghana

The Framework on Police-Media Relations and Safety of Journalists was released in the year 2019 after deliberate consultations with various stakeholders including the National Media Commission, Ghana Journalists Association and the national police service (Ghana Police Service, 2020). Following an analysis of the sources of limitations to the safety of journalists in the country, the Framework outlines a list of 'action points' to improve relations between the media and police, highlighting the responsibilities of both groups in order to achieve this goal. Furthermore, a series of procedures and mechanisms to settle complaints are listed, including creating a complaint desk and describing how both groups should interact with one another (Ghana Police Service, 2020).

Kenya

The Kenyan Media Working Group created a guide titled 'Staying Safe: A Protection Guide for Journalists in Kenya' in 2014, in collaboration with many local and international organizations. This manual evaluates both the legislative and professional work environment of journalists in the country related to their safety. It highlights key protection mechanisms that journalists should be aware of, such as their rights according to the UDHR and Kenyan Constitution or important items such as press cards or helmets to have on hand for greater safety (Kenyan Media Working Group, 2014). Over 1,800 copies of the manual, printed in both English and Swahili, have been distributed across workshops, newsrooms and journalism school libraries, as well as being available online (Nyabuga, 2016).

Contributions by Civil Society

Rwanda

The Rwanda Media Commission (RMC) is a self-regulatory body set up by journalists to ensure compliance with media governing principles and to defend general interest under Article 2(20) of the law regulating media (RMC, 2013). Included in the Commission are journalists and editors, citizens elected by the general assembly of journalists and media practitioners. Its duties include representing the broader interest of journalists by enforcing the code of ethics, defending media freedoms through interventions and monitoring the day to day operations of the media and journalists. The work of the RMC has been effective over the years, with 48 out of 49 registered complaints being solved, including cases brought by journalists against government officials and media houses. Additionally, the RMC is involved in advocacy by highlighting the rights of journalists and ensuring a proper understanding of the role of media in society to governmental bodies, security organs and

civil society. Moreover it has been able to accredit 160 journalists with press cards (RMC, 2013).5

Tunisia

The National Syndicate of Tunisian Journalists (SNJT) was created in 2017 with financial and technical assistance from the OHCHR and UNESCO. It monitors threats and attacks made against journalists, as well as restrictions on websites. It works with the Ministry of Interior to ensure the physical and digital security of journalists, while also ensuring that journalists covering attacks are protected by security forces (Mitchell, 2022). According to UN representatives, the SNJT is a unique mechanism in the Arab world, which strives to be a strong, independent and professional organization that defends media freedom and the social and professional rights of journalists (Yahmed, 2019). Moreover, the SNJT has provided training for journalists regarding press laws and aims to legally support journalists (Mitchell, 2022).

Governmental and Non-Governmental Collaboration in Europe

Denmark

The Danish National Plan on the Safety of Journalists and the Issue of Impunity was agreed between the government, media industry, IMS and Ministry of Justice in 2022 to ensure a well-functioning democracy. This Plan has undertaken a set of action points, such as monitoring attacks against journalists, following up on reports and maintaining dialogue between parties to inform each other of developments. It has helped to create a safer environment for journalists, their families and their sources. Moreover, this Plan maintains an exchange of information and experiences with other working groups (ARTICLE 19, 2022a).

Netherlands

The Agreement of the Steering Group on Aggression and Violence Against Journalists was agreed upon in 2018 by Dutch journalist associations, the Dutch Minister of Justice and the national police by highlighting the importance of journalists within society. The measures which are undertaken include a collective set of norms determining unacceptable aggressive behavior, which if met are followed by criminal complaints and training programmes to educate journalists on how to defend themselves against intimidation or aggression. Importantly, freelance journalists are specifically included in the plan, with the Journalist Association of the Netherlands in particular acting as a separate point of contact for freelancers (European Federation of Journalists, 2018).

on press card accreditation can be More up-to-date information http://rmc.org.rw/wp-content/uploads/2019/07/LIST-OF-ACCREDITED-JOURNALISTS-AND-MEDI A-PRACTITIONERS-BY-RWANDA-MEDIA-COMMISSION-1.pdf

Analysis

The various kinds of strategies adopted under this approach are based on collaborations and consultations with international, regional and national actors sharing good practices and methods. This includes initiatives by the government or representatives of governments to be a part of multi-stakeholders efforts taken towards enhancing measures for the safety of journalists. Generally, the mechanisms found under this approach are strongly focused on the prevention aspect of journalists' safety, with some of their methods including capacity building programs for a range of key actors, raising awareness on journalistic community, monitoring attacks and ensuring that the root causes of the issue are addressed. It is important to highlight that the strategies mentioned are not an exhaustive list and can be subject to change based on the needs of the country.

An important aspect of the participatory approach is the collaboration between various actors which takes place for the creation and execution of these mechanisms. For example, national actors and international and regional organizations working together can be helpful for highlighting key problems faced by journalists and sharing good practices and advice which can then provide guidance during the creation of specific mechanisms tailored to individual countries. Another important collaborator are the journalists themselves, whose input and lived experience are invaluable to the creation of more sustainable and adapted strategies. Overall, this collaborative aspect of this approach is significant for the inception of mechanisms which are built on a wide range of expertise.

This approach can be effective in countries that do not have sufficient resources and support to address their national safety issues for journalists themselves. However, within this kind of approach it is important to ensure that these collaborations are maintained through adequate funding, a continuous willingness of concerned governments and sufficient monitoring of progress under the initiative. This is key to the sustainability and continued impact of these participatory mechanisms.

IV. Human Rights Based Approach

Journalists play a vital role in the protection and promotion of human rights, primarily due to their inherent link to one of the most fundamental human rights, that of the right to freedom of expression. A human rights based approach to the safety of journalists includes mechanisms which are grounded in international human rights law and seek to protect the human rights of journalists, their families and their sources. These approaches are inclusive and may pay particular attention to vulnerable groups.

Latin America

Ombudsman Offices for Journalist Rights

Guatemala

The Human Rights Ombudsman in Guatemala is appointed to defend the human rights established in the Constitution of Guatemala, the UDHR and other international conventions ratified by the State. It is organized into 17 offices focusing on various issues and groups, one of which includes journalists and is named the Office of the Ombudsman for Human Rights Defenders and Journalists. Its goal is to protect, promote and investigate the human rights of journalists and human rights defenders. It creates guidelines to achieve such objectives, supervises the administrations responsible for these human rights, makes recommendations, verifies cases and creates educational and thematic reports on the rights of these groups (Monzón & Santa Cruz, 2023a).

El Salvador

Another example of such a mechanism is the Human Rights Ombudsman's Office of El Salvador, which is an independent institution of the Public Prosecutor's Office. It receives complaints by journalists as well as participates in issues regarding freedom of expression and journalist safety. It also shows an acknowledgement of the specificities for women journalists, assigning specialized units for complaints by women journalists. It also collaborates with civil society to develop protective and preventive mechanisms for journalists (Monzón & Santa Cruz, 2023a).

Court Cases

Paraguay

In 2014, local journalist Pablo Medina Valazquez, who was dedicated to investigating drug trafficking and crimes of politicians, was murdered alongside his assistant. The mayor who was found responsible for arranging the murder was sentenced to 39 years in prison. The judge responsible for the sentencing argues this prosecution sent a 'clear message' of intolerance for attempts to silence journalists. This **historic ruling to end impunity** is the first in Paraguay to condemn the author of a killing of a journalist (UNESCO, 2021b).

Asia

Nepal

The Nepal National Human Rights Commission (NHRC) was created, following work by several international organizations, in order to create a national journalist safety mechanism. It includes representatives from multiple domains, including journalist associations, police forces and governmental offices. The NHRC seeks to create measures which are both proactive and reactive for the prevention of violence against journalists exercising their right to free expression. It is also a prosecutorial mechanism by working to

ensure the prosecution of suspected perpetrators of violations against journalists (Council of Europe, 2020; Bhattarai, 2022).

Africa

Uganda

The Human Rights Network for Journalists-Uganda (HRNJ-Uganda) is an NGO consisting of a network of human rights journalists in Uganda dedicated to working towards improving the protection, respect and promotion of human rights by defending and building upon journalist's capacities to effectively exercise both their constitutional and fundamental rights. This Network was created in 2005 by a group of journalists working across various mediums, as well as freelancers and students. Their mission is to enhance the promotion and protection of the rights of journalists through advocacy, emergency support and capacity building. They state that they have empowered over 4,700 journalists, rescued 476 from the police, implemented 47 projects and reached 57 districts. They have also specifically focused on ensuring that their strategies can benefit more marginalized journalists, such as women, veterans or disabled journalists. On their site, they publish yearly reports monitoring the situations for journalists in the country, along with training manuals for journalists (HRNJ-Uganda, 2021). The HRNJ-Uganda is particularly notable as an excellent example of an NGO working towards protecting journalists' human rights and is highly commended by local journalists in the country (Walulya, 2020).

Europe

Switzerland

In response to demands by the Council of Europe, Switzerland put in place a National Action Plan for the Safety of Media Professionals. In general, this Plan seeks to inscribe themes of journalist safety into the public agenda, promote security issues journalists face, increase the sensibility of society and the political sphere regarding the key role of media in the functioning of democracy in the country. It also acknowledges specifically the need for protection from digital abuse against journalists and a greater need for physical protection. The Swiss Plan is aligned with the UN Plan of Action as it highlights action points in all three pillars of prevention, protection and prosecution (Département Fédéral de l'Environnement, des Transports, de l'Énergie et de la Communication (DETEC), 2023).

Legal Protections

Kosovo

Kosovo, in 2013, passed the Law on the Protection of Journalism Sources, which seeks to protect journalists and their right to protect their sources (Dhjetor, 2018). This includes the right of journalists, or others working in the media, to remain silent when prompted about their sources of information. By virtue of this law, journalists are not obliged to reveal

information which relates to or may reveal their source's identity, the origin of their information or the content of their information if this might identify their source (Law on the Protection of Journalist Sources 2013).

Ukraine

Another example of a law which protects the rights of journalists is the Law on State Support for Mass Media and Social Protection of Journalists in Ukraine. This law specifies protection of rights to labor protection (Article 13), the liabilities for committing a crime against a journalist due to their occupation (Article 17) and financial benefits for the families of killed journalists (Article 18) (Law on State Support for Mass Media and Social Protection of Journalists 1997).

North America

Canada

An additional example of a law which protects the rights of journalists' sources is the 2018 Journalistic Sources Protection Act in Canada. This law represents an amendment to the Canada Evidence Act and the Criminal Code, and allows journalists to have the right to to disclose information which may identify their journalistic sources (Journalistic Sources Protection Act 2017).

Analysis

Journalists, by virtue of their humanity, are protected by human rights. Indeed, some of their key rights, such as freedom of expression or the right to life, are widely accepted and codified by States globally. While their rights have also often been emphasized by regional bodies, such as regional human rights courts, individual's human rights are primarily the responsibility of national governments (Heyns & Srinivansan, 2013). It is therefore dismaying that it is generally challenging to identify national human rights mechanisms which implement these international or regional standards within their own practices and explicitly protect journalists, a trend which is surprising given their vulnerability in many countries around the world.

One of the key takeaways from this section are the contributions which human rights approaches make to the prosecution pillar of the UN Plan of Action. This can be seen for example through mechanisms that protect journalistic sources or which combat impunity by ensuring criminal consequences for the murders of journalists. These mechanisms are thus good examples of frameworks which combat impunity, which is a vital aspect for the safety of journalists given the extent of impunity for crimes against journalists globally. The value of human rights approaches is therefore clear and thus is worth further expanding, especially in regions where these mechanisms are less identifiable, such as in Asia or Africa.

Additionally, further specialized investigative units or prosecutors would be beneficial to ensure the safety of journalists through prosecutions.

V. Gender Based Approach

The gender based approach encapsulates frameworks or mechanisms which focus on women's issues. They can deal directly with general gender issues or with issues specifically related to women journalists, such as access to management positions within the media sector or safety while working. Furthermore, these mechanisms can also include awareness campaigns through training or publishing information on the previously mentioned issues.

This approach is particularly important as women in this occupation are targeted both due to their gender and for their work as journalists. Women in this field are subjected specific types of harms, such as sexual harassment and sexism in their workplace, an experience which continues outside of the workplace through high rates of harrassment on the internet and social media (UNESCO, 2021a). Moreover, 76 women journalists have been killed since 2013 (UNESCO, 2023c).

Journalist Network in Latin America

Colombia

Besides the UNP, which is one of the strongest gender approach mechanisms globally with its Women's Protection Path, which ensures the protection of women journalists who are targeted for their career, civil society is also implicated in a gendered approach to protecting journalists in Colombia (Chocarro, 2019). The Colombian Network of Journalists with Gender Perspective (Red Colombiana de Periodistas con Visión de Género) defends women in media through research, workshops and trainings, among other means (Chocarro, 2019). It has been operating since 2007 and is also oriented towards Section J ("Women and the Media") of the Beijing Platform (Red Colombiana de Periodistas con Visión de Género, 2018).

Asia

General Legal Frameworks

The Convention on the Elimination of Discrimination Against Women (CEDAW) is one of the central legal frameworks which seeks to eliminate discrimination against women. While CEDAW is widely ratified around the world, the following countries provide specific protections for women, in addition to their application of the Convention.

Philippines

Republic Act 9710, known as the Magna Carta of Women, is a human rights law for women which aims to stop their discrimination through the recognition, defense and promotion of the rights of Filipino women. This mechanism ensures that the Philippine government fulfills its commitment to the Committee of the CEDAW. As a result, the act focuses specifically on the professional sphere, such as by introducing an equal gender balance in high government positions (Philippine Commission on Women, 2023). The Philippines, known for its high gender equality in comparison to other States in the region, maintains this characteristic in the media sector, which has welcomed more female journalists as leaders of media organizations (Ofreneo and Illo, 2020).

India

The Protection of Women against Sexual Harassment at the Workplace (PoSH) Act was enacted in 2013 with the aim of countering discrimination and the harassment of women in workplace (Sexual Harassment of Women at Workplace Act, 2013). Within its framework, a workplace includes: "any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey" (Sexual Harassment of Women at Workplace Act, 2013). This sentence is particularly significant for journalists, for whom the workplace is widened to the multiple places visited during their work time.⁶

Complaints and Testimonies

Iraq

The digital reporting platform for Iraqi women journalists is a reporting mechanism which manages issues that women journalists face, coordinated primarily by female police officers since 2021 (Hazzaz, Kirkland and Van Bockstael, 2022). The platform creates a connection between Iraqi women journalists and the Iraqi National Committee for the Safety of Journalists and the Fight Against Impunity, with the aim of protecting justice, reducing impunity and ensuring the government's response for issues of journalists' safety (UNESCO, 2021d). Approximately 20 judges were appointed under an order from Iraqi authorities, which gave women journalists the possibility to sue their cases through this digital platform rather than through police stations. Between December 2021 and February 2022, 164

⁶ Elsewhere, there are some positive mechanisms in Europe which undertake the significant issue of online harassment for female journalists. One such mechanism is the French 2018 Sexual and Sexist Harassment Act or Schiappa Law, named after the French gender equality minister, enacted to deter harassment in a broader way, by defining the online aspect of harassment (Beaussonie, 2019). As a consequence of the online harassment case of journalist Nadia Daam, this jurisdiction ensures, in a unique way, a gender specific response to online sexual and sexist abuse for journalists (McCully, 2019).

reports were submitted through the platform and around 800 calls were answered (Hazzaz, Kirkland and Van Bockstael, 2022).

Civil society efforts on violence and social inclusion Nepal

Sancharika Samuha Nepal (SASN) is a forum of women journalists and communicators created in 1996 after the UN Fourth World Conference on Women and the Beijing Platform for Action, with more than 1,200 women journalists affiliated across Nepal (Sancharika Samuha, 2021). As the biggest organisation fighting violence against women journalists in the country, it has prepared reports regarding the situation of women journalists aiming to enlighten the challenges they face (Chocarro, 2019). Among its methods, SASN has programmes on gender advocacy regarding the media industry that are broadcasted on two radio channels, which has thus helped to train many journalists (Nasruddin, 2021).

Indonesia

Another example of a forum is available in Indonesia with the *Forum Jurnalis Perempuan Indonesia* or Indonesian Women Journalists Forum (FJPI). This mechanism has united women journalists since its creation in 2007, focusing particularly on advocacy, as well as education, training and empowerment. Consequently, the first Indonesian Women's Journalists Forum was inaugurated in 2018, followed by a second one in 2022 (Forum Jurnalis Perempuan Indonesia, 2022). The FJPI also works in the field to tackle gender issues, such as with its particularly notable activies to support women journalists who have experienced sexual harassment (Chocarro, 2019).

Cambodia

Working in the information sector, the Women's Media Centre (WMC) is a non-governmental organization founded by five women at the same time as the 1995 Beijing Conference (Women's Media Centre of Cambodia, 2023). It broadcasts news to highlight female-specific social issues in order to advance women's rights and ensure gender equality (Women's Media Centre of Cambodia, 2023). One of its initiatives includes supporting the safety, capacity-building and visibility of women journalists in Cambodia by providing its knowledge to multiple stakeholders in order to ensure a safe environment for women to practice their profession (UNESCO, 2023a).

NGO Led Examples in Africa

Sudan

The Sudanese Journalist Union (SJU) has organized training programmes for female journalists with the support of the Khartoum office of UNESCO and Sudanese National Commission for Education, Science and Culture (UNESCO, 2023b). This training was

renewed by SJU and Khartoum office of UNESCO in 2019 as a result of a greater interest and participation by journalists (UNESCO, 2023e).

Somalia

Media Women Network (MWN) is a Somali NGO created in 2016 to promote media freedom and women journalists' rights by enhancing their access to management roles within the media sector (Media Women Network, 2020). It brought together women journalists and media managers to discuss gender issues related to their common sector of activity (Chocarro, 2019). In collaboration with the IMS, Fojo, the Somalia Women Journalists Organisation and the Somalia National University, the MWN implemented the Somalia Media Program from 2019 to 2023, aiming mainly to enhance gender equality in diverse ways. For example, the MWN created training for women to access higher positions in media sector management (Fojo Linnaeus University, 2021).

Analysis

As can be observed, there are several types of mechanisms and actors implicated within the gender approach. Governments and their legislative authorities are primarily engaged in the establishment of legal frameworks which deal broadly with gender issues. The main themes implicated in these frameworks are those of harassment, violence and discrimination, the latter of which continues to be based in the CEDAW. These mechanisms ensure protection and prosecution for these issues that women experience.

To support women journalists, some actors applied a digital strategy and have implemented frameworks to collect complaints and testimonies from women, as can be seen in UNESCO's mechanism in Iraq. These mechanisms are useful for providing data on the experiences of women journalists and thus help to monitor the abuses they endure. Therefore, these reporting mechanisms also have a potential to be beneficial for adequate prosecution.

Finally, civil society has a particularly striking role for enhancing women journalists' experiences, notably since the 1996 UN Fourth World Conference on Women and the Beijing Platform, in which section J focuses on "Women and the Media". Awareness campaigns and training regarding women journalists and gender issues are among the main strategies followed by civil society. However, the focus can vary accordingly with the interests of the specific NGOs, with some focusing on diverse issues such as violence against women, equality in the workplace and equality of opportunity. Civil society has therefore been valuable for the prevention of abuses against women journalists and in the protection of women journalists.

VI. Strategic Approach

Strategic approaches to journalist safety involve a risk analysis which identifies the threats to journalists, the causes of threats or violence and the mitigating factors. It also involves a prioritization of mechanisms according to their feasibility and their potential impact. Furthermore, such an approach also necessitates country-specific considerations.

Latin America

Brazil

Journalists in Brazil are highly vulnerable to attacks when covering street protests, with over 300 journalists being attacked between 2013 and 2016, the majority of which were perpetrated by police forces. In response to this, the Brazilian Association of Investigative Journalism published a guide titled the Security Manual for Protest Coverage in Brazil. This guide is tailored specifically to the context in Brazil and covers topics such as legal issues, risk analysis, advice regarding security and protective equipment and other safety steps (Kilman, 2017). It was created through a series of interviews and international protocols and is a strategic protective mechanism (Glock, 2014).

Colombia

In Colombia, the profession of journalism is a perilous one, especially when a journalist is working alone. The *Consejo de Redacción* (Editorial Board) addresses this particular vulnerability by creating a network of journalists who, throughout years of experience, have gathered techniques on how to protect themselves which are 'time tested'. One of its largest projects is the provisions of a working space and training of journalists when addressing issues of corruption or conflict, which has seen the participation of 100 journalists (Kilman, 2017).

Asia

Pakistan

The Pakistan Journalist Safety Fund (PJSF) was established in 2011 and is a short-term mechanism, involving both international and local actors, which intends to provide rapid-response services and meet urgent security needs of media practitioners considered to be in crisis. Such services include short-term relocations for journalists under threat, the coverage of medical costs for wounded journalists, legal aid and financial compensation for families of deceased journalists. While this mechanism, due to its short-term nature, does not address the root causes of threats against journalists, it has helped to fill the significant gap that existed for the protection of journalists in the country (Inkinen et al., 2017).

Iraq

A group of lawyers from across Iraq created an NGO named the Network of Lawyers for Freedom of Expression, which seeks to respond to the general lack of awareness by journalists regarding their rights, or restrictions upon their rights, related to freedom of expression. Services carried out by the NGO include a free advice hotline, pro bono work by lawyers and awareness raising through the publishing of reports on journalists' legal rights in both Arabic and Kurdish. Founded in 2015, in its first year, it responded to 400 calls from journalists or writers seeking counsel and won 41 court cases (Inkinen et al., 2017).

Practical Mechanisms in Europe

Netherlands

Over recent years, the situation for journalists in the Netherlands has been deteriorating amidst a context of hardening debates and a polarized political climate making threats against journalists a more serious concern within the country. As a response, the Netherlands established PersVeilig (Dutch for 'press safety') in order to improve and promote journalist safety on a legal, digital and physical basis. Described as a "pioneering mechanism" (Media Freedom Rapid Response, 2022: 3), PersVeilig was piloted in 2019 and is comprised of a myriad of measures ranging from preventative approaches, in the form of hotlines to report threats or security training, to prosecution measures, such as the prioritization of investigations and prosecutions for attacks against journalists. This mechanism is widely supported, notably by journalists who applaud the symbolic value of this mechanism (Media Freedom Rapid Response, 2022). As such, PersVeilig is a positive example of a mechanism which successfully ensures journalists safety by focusing on all three pillars of prevention, protection and prosecution.

Belgium

The Flemish Association of Journalists in 2019 created 'Persveilig.be' as a response to the increased aggression against journalists (Persveilig & Vlaamse Vereniging van Journaliste, 2022; ARTICLE 19 Europe, 2022a). Its central aims are to map and monitor aggression against journalists and initiate discussions regarding possible solutions (ARTICLE 19 Europe, 2022a). This mechanism is highly practical and caters to journalists by providing them with a variety of tools including: a place for journalists to report aggressions they have experienced and receive assistance, practical training to gain safety skills and access to press cards, protective gear and insurance (Persveilig & Vlaamse Vereniging van Journaliste, 2022).

Slovakia

In 2023, a new mechanism named Safe.Journalism.sk (Bezpecna.Zurnalistika.sk) was launched in Slovakia, which was inspired by the above PersVeilig and in fact is funded in part by the Embassy of the Netherlands. This mechanism is a protective mechanism which

seeks to monitor and prevent attacks on journalists and assist victims in the country (RSF, 2021).

North America

United States of America

The Reporters Committee for the Freedom of Press launched an initiative called the Local Legal Initiative to expand free legal support for local enterprises and investigative journalism in the states of Colorado, Oklahoma, Oregon, Pennsylvania and Tennessee. Attorneys in these states are dedicated to addressing the serious legal challenges which journalists face. They support local journalism by addressing government officials, executing legal training with local newsrooms and providing free consultations through their free legal hotline. Over the years, 700 journalists, students and lawyers have been trained and 240 have been helped through the legal hotline. Moreover, they plan to expand their outreach to ensure their attorney's services are accessible to rural journalists (Young, 2023).

Australia

SLAPPs have been plaguing the journalism industry in recent years, by using the law, such as defamation laws, as weapons against journalists to cause them financial and psychological harm, silence them and prevent them from fulfilling their reporting duties. Anti-SLAPP laws are protective mechanisms which are an increasing priority for those who aim to safeguard journalists and freedom of expression (Borg-Barthet, et al., 2021). One such law can be found in Australia with the **Protection of Public Participation Act**. This law combats SLAPPs by enabling the court to order the plaintiff to pay financial penalties if they used a lawsuit for an improper purpose (Wilkins, et al., 2010).

Analysis

As these exemplary mechanisms demonstrate, strategic approaches to safeguarding journalists are highly practical mechanisms. They are mechanisms which are intended for use, often by journalists themselves, as is the case for the hotlines or mechanisms providing legal assistance. As a result, these are good examples of practices which can be implemented when the root cause for aggression against journalists cannot be addressed immediately. Such an approach is sometimes more appropriate when rapid response mechanisms are needed in order to protect the immediate safety of journalists. Indeed, tackling these root causes for aggression against journalists can be challenging as these causes can often be systematic and ingrained within the very political system tasked with rectifying it. It may thus be beneficial to adopt a multidimensional strategy for developing a safer environment for journalists, by applying these strategic approaches simultaneously

with more structural approaches, such as national plans of actions, in order to ensure a more long-lasting state of security for journalists within a country.

Additionally, one may wish to consider the other ways a safety mechanism may take a strategic approach, such as by targeting a particularly vulnerable group or by considering the discrepancies that journalists in different areas within a country or city may experience when it comes to their access to a safety mechanism.

VII. Grounded Approach

The grounded approach represents the creation by local or national entities of mechanisms related to the safety of journalists within a particular context. It is specifically a multi-stakeholder oriented approach, since it requires the interaction of local bodies to create and implement mechanisms.

While there are naturally a myriad of mechanisms which fall under this approach, press or media councils represent an interesting majority. As such, this section will focus particular attention on these types of mechanisms. Media Councils take on many roles, including supervising the code of ethics and enhancing freedom of the press (Neuvonen, 2023). As such, they codify measures to enhance freedom of the press, which serves to protect journalists as one of the main actors towards this freedom. They may also differ on their connection to other actors. For example, some Media Councils are relatively self-regulatory, many are coordinated by nongovernmental entities, which oversee the media sector (Neuvonen, 2023) Others have some connections with the government, through aspects such as their funding (Gore & Horgan, 2010). With this in mind, focusing on councils is particularly relevant due to their role in the digital era, as they are responsible for various adaptations of journalists' codes of ethics, their work and statutes should adapt to the digital age (UNESCO, 2023d).

Latin America

Peru

Consejo de la Prensa Peruana or the Peruvian Press Council has coordinated awareness campaigns with governmental and non-governmental actors to enhance freedom of expression and the media's role (Consejo de la Prensa Peruana, 2022). Simultaneously with the creation of the Press Council in 1997, the Tribunal of Ethics was founded as an independent body, which thus received complaints and ensured journalistic self-regulation (Tribunal de Ética, 2023).

Chile

The Communication Media Ethics Council is a Chilean self-regulatory body working on issues of information ethics supervising the work carried out by media organisations (Consejo de Ética, 2023). This Council was created by the Federation of Social Communication Media, which is composed of various Associations, to enhance freedom of expression (Escribano Velásquez, 2020). Compared to other media or press councils dealing with complaints in Latin America, the Chilean Media Ethics Council is among the few to be still active, with each complaint case and its subsequent resolution being available online, the last one dated from 2021 (Consejo de Ética, 2023).

Asia

Indonesia

Created under the Press Law of 1999, the Indonesian Press Council (IPC) is a self-regulatory institution aiming to enhance professionalism in journalism by reducing government interference in media affairs and strengthening media organisations to regulate the media sector (Romano & Prasetyo, 2021). Under Article 15 of the Law, the role of creating a Code of Ethics is allocated to IPC (Press Law, 1999). To fulfill this role, IPC organised a meeting where all journalists associations were invited to prepare the Journalistic Code of Ethics (Romano & Prasetyo, 2021), thus benefiting from collaboration. Additionally, resolving media disputes between society or the government and the press is a core function of the Press Council (Inkinen et al., 2017).

Cambodia

The Cambodian Center for Independent Media (CCIM) is an NGO created in 2007 to enhance freedom of expression and media and promote independent media alternatives (Cambodian Center for Independent Media, 2020). To establish a comprehensive and binding Code of Ethics, CCIM cooperated with various journalistic organizations in Cambodia and proposed a Code of Ethics for Cambodian Journalists, which was agreed upon with media associations and NGOs (Oldag et al., 2015). More than 200 journalists were trained according to the content of the Code of Ethics to generalise independent journalism (Cambodian Center for Independent Media, 2020).

Bolivia: El Observatorio Nacional de Medios (National Media Observatory)

Brazil: Associação Nacional de Jornais (National Association of Newspapers)

Ecuador: Comité Interinstitucional de Protección a Periodistas y los Trabajadores de la Comunicación (Interinstitutional Committee for the Protection of Journalists and Communication)

Colombia: Asociación Colombiana de Editores de Diarios y Medios Informativos (Colombian Association of Newspaper Editors and Media - AMI) created in 1961 as the Colombian Association of Newspaper Editors (Andiarios)

Paraguay: Sindicato de Periodistas del Paraguay (Union of Journalists of Paraguay)

⁷ It is particularly challenging to find mechanisms such as press councils or associations in Latin America. The following mechanisms were identifiable, but their continued operations cannot be verified.

Africa

Tanzania

The Media Council of Tanzania (MCT) is an independent organ created in 1995 with the aim of promoting freedom of the media and enhancing professional media standards and accountability in Tanzania (Media Council of Tanzania, 2019). This was a unique mechanism at the time, since media councils were untested in Africa. MCT is organized in an inclusive way, with members both in the media and public sector, therefore enabling it to work with multiple stakeholders. Similarly to most other media councils, MCT proposes a code of ethics related to professionals. Thanks to its multi-stakeholder approach, the MCT held a think tank in 2009 with participants from multiple backgrounds, such as publishing, education or journalism, which suggested the Dar es Salaam Declaration on Editorial Freedom, Independence and Responsibility (Chandrasekhar, 2012).

Kenya

Formerly a self-regulatory body created by media stakeholders in 2004 with the purpose of overseeing the media and diminishing state interference, the Media Council of Kenya (MCK) became a statutory body after the enactment of Media Act 2007 as a result of exchanges between government and media partners (Jalang'o, 2018). Since 2013, after being integrated in the Constitution with a development of the Act, the MCK is a regulatory body responsible for the code of conduct and media curriculum. It is also responsible for receiving complaints and handling disputes between the government or the public and the media (Jalang'o, 2018). The exhaustive list of stakeholders working with MCK, makes this mechanism valuable, with the partners divided across multiple sectors, such as in the media, the government, business or civil society (Media Council of Kenya, 2021).

Somalia

The National Union for Somali Journalists (NUSOJ) led the creation of the National Action Plan regarding journalists' safety after a forum organized by NUSOJ, focusing on the UN Plan of Action and on manners to establish a safer working environment for Somali journalists. Among the participants welcomed from various Somali media houses, the government, UNESCO and ILO, up to 60 journalists exchanged on the situation of the media sector (National Union for Somali Journalists, 2022). Therefore, the multistakeholder approach resulted in a multi-level approach towards the safety of journalists, which considered the physical, legal, mental, gendered and technological dimensions of violence and harassment against journalists (Kithumbu, 2022). The dialogue between duty-bearers (state authorities) and right-holders (journalists) has been guaranteed thanks to the National Plan of Action (Hazzaz, Kirkland and Van Bockstael, 2022).

Alternative Mechanisms in Europe

Besides media councils, the following are some other forms of grounded approaches to the safety of journalists which were identified in Europe specifically.

Serbia

In Serbia, the Agreement on Cooperation and Measures to Increase the Safety of Journalists was signed in late 2016. Working through the Standing Working Group, it aims to encourage members to work together every three months and set up a system of controls to provide journalists with a more effective level of legal protection (ARTICLE 19 Europe, 2022b). Bringing together the representatives of the signatories, namely Serbian Republic Public Prosecutor's Office, the Ministry of Interior and six journalism and media associations, this agreement was part of the process of Serbia's accession to the European Union and was warmly welcomed by the associations (ARTICLE 19 Europe, 2022b).

Italy

To counter the acts of intimidation against journalists, the Italian Ministry of Internal Affairs chaired the Coordination Center on the Phenomenon of Acts of Intimidation Against Journalists, which is composed of Italian authorities and journalists representatives since 2017 (Ministero Dell'Interno, 2021). The Center is in charge of overseeing and choosing protective measures for journalists and was established following many years of advocacy and exchange between the media and authorities. Journalists who were formerly limited when they were reporting threats to the police, through this mechanism, are now empowered by specific procedures for both reporting and protective measures (Article 19 Europe, 2022b). Additionally, a permanent body mandated by the Chief of Police's decree in 2018, proposes methods to the Center to strengthen the prevention of acts of intimidation against journalists and reports the current events related to these acts (Ministero Dell'Interno, 2021). The Center has been affirmed as being successful by the Italian Press Federation since the threat to journalists decreased by 50% from 2021 to 2022 and decreased with the same rate for the first months of 2023, compared to the same period in 2022 (2023).

Analysis

Generally, press councils opt for self-regulation in order to ensure their independence. Councils are responsible for the creation and development of codes of ethics or conduct aiming to ensure professionalism in journalism and thus are also responsible for handling complaints based on these codes. Therefore, media councils are important to the safety of journalists, who are highly implicated in these codes. These frameworks ensure the responsibility and liability of those in the public sector, media sector and the audience.

As can be observed with some of these mechanisms, councils can be integrated into the legal system through specific bills or acts which create connections with governments. Subsequently, legislative power integrates press council's work to the competence of the judiciary. The institutionalization of this link makes self-regulation and independence weaker, but ensures a better accountability for the cases identified.

Beyond these councils, the creation of frameworks through local collaborations between governments and media organisations are beneficial as they represent the needs of those actors directly involved in the safety of journalists. Alternative mechanisms in Somalia, Italy and Serbia remain grounded through the bond created between government and media organizations. In these cases, the collaboration with governmental offices can be helpful for access to resources, such as data sharing in the case of the Coordination Center in Italy.

Conclusion

In line with the aim of mapping national frameworks for the safety of journalists globally, this report has examined a total of fifty-nine different mechanisms and good practices for the safety of journalists implemented across thirty-nine different countries. Throughout, it has offered a comprehensive analysis of these initiatives and provided insights into the various approaches that can be adopted in order to promote a safer environment for journalists. The findings of this report help to illuminate the state of national safety mechanisms for journalists around the world.

To conclude, this report will focus particularly on what has been learned about the safety of journalists in relation to the three pillars of the Plan of Action. However, before discussing this, some more general observations and comments can be addressed.

The first pertains to an analysis of the limitations of this report. As stated in the methodology, this report has encountered limitations related to the identification of mechanisms. Often, the process of finding mechanisms in different countries, particularly in those beyond the global north, was challenging and time consuming due to a lack of available resources and language limitations. One can note that the limitations which we as researchers have encountered may also be experienced by journalists or individuals in need of these safety mechanisms. As a result, journalists who are threatened or abused may have difficulties accessing mechanisms which they may require during challenging or unsafe situations. While some of the language issues encountered may be mitigated by the language capabilities of local journalists accessing their national safety mechanisms, a concern is still raised regarding the lack of access to, and visibility of, safety mechanisms.

Furthermore, one may ponder the possibility of the reasons for the inaccessibility of some of these mechanisms online, perhaps as a consequence of a lack of internet access or due to limited budgets. Consequently, journalists or researchers are unable to benefit from the work of these mechanisms and their corresponding actors. The centralisation of information regarding the safety of journalists and the mechanisms dealing with this issue would be a bigger project which could address the lack of visibility and accessibility of some mechanisms to journalists and other concerned actors.

Additionally, when discussing the limitations, it is important to highlight once again that the analysis made throughout this research includes only the mechanisms identified throughout

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⁸ Within this report, a total of 59 mechanisms are described in detail under each approach (not counting those included in the footnotes). The distribution of these mechanisms per region is as follows: 13 mechanisms across 8 countries in Latin America, 15 mechanisms across 7 countries in Asia, 10 mechanisms across 8 countries in Africa, 17 mechanisms across 13 countries in Europe, 3 mechanisms across 2 countries in North America and 1 mechanism in Australia.

the five month research process of this project. The mechanisms which have been noted in this report are also only those available online or through previously published reports. Thus, the conclusions which have been reached should be understood within these limits.

Moving beyond the significance of the limitations, some observations can be made about the role of different actors. Civil society is one of the central actors in the field of journalist safety. Indeed, many mechanisms, when not established by civil society organizations or groups themselves, were created as a response to heavy pressure from civil society. This demonstrates both the importance and positive influence that they can have. Besides civil society, the influence of international organizations is also of note. In particular, many of these mechanisms outside of the European region relied on collaborations with international organizations, such as UNESCO. Therefore, while these mechanisms are national safety mechanisms, the role of international actors remains influential.

Observations on the Three Pillars

The three pillars belonging to the UN Plan of Action of prevention, protection and prosecution have been central to the research of this report. It is clear that these three core pillars are far-reaching and inclusive to all national safety mechanisms identified in this report. As such, these pillars serve as highly useful guiding tools for both the implementation of effective safety mechanisms and their subsequent evaluation. As has been mentioned, these pillars operate in an interdependent manner in order to mutually reinforce one another and create a robust system of mechanisms for the safety of journalists. With this in mind, this report has illustrated and differentiated some patterns for each pillar, which will now be discussed below.

Firstly, the aspect of **prevention** involves mechanisms which seek to create an environment which is conducive to the practice of journalism. It can be observed that one of the key aspects of this pillar is the multi-stakeholder approach which can be noticed throughout different preventative mechanisms. Such an approach has shown to play a crucial role regarding the incorporation of diverse actors in order to facilitate mechanisms which are thorough and effective. This kind of inclusive approach allows concerned actors to identify and reveal any shortcomings or structural issues which are contributing to an unsafe environment for journalists, as well as issues with existing mechanisms which seek to address them. It also enables a sharing of knowledge and expertise which is of great value. Particularly, the participation of journalist associations and journalists themselves is key to creating mechanisms which are best adapted to their own needs and experiences.

Moreover, many of the mechanisms found which took preventative measures, such as various different capacity building programmes, have been initiated by NGOs with the support or collaboration of international and regional organizations. By harnessing the

expertise and resources of various stakeholders, journalists's safety can be strengthened by ensuring a more comprehensive approach.

Secondly, mechanisms focused on the **protection** of journalists aim to provide journalists with frameworks that may shield them from harm in various forms, such as physical, digital or legal. Throughout this report, it is evident that specific mechanisms of protection vary depending on the country and the differing circumstances which journalists encounter within it. Therefore, it is crucial to emphasize the importance of context-specific approaches which address the particular challenges that journalists face in different parts of the world. In certain countries, protection of journalists will entail protecting their lives and physical wellbeing, whereas in others, the approach to protection relates more to the protection of their work.

Additionally, it is interesting to note that many of these protective mechanisms are concerned with surface level issues, rather than taking a more structural approach. This can be noticed for example through the myriad of rapid response mechanisms found across several countries. The importance of these mechanisms to journalists should not be understated, but questions may be raised relating to the sustainability of such approaches and their efficiency for the long-term safety of journalists.

Finally, the **prosecution** aspect of journalist safety tasks itself with addressing accountability for crimes committed against journalists and thus combats the vicious cycle of impunity and further violence. Mechanisms found under this pillar included those legally protecting journalists, specialized offices or landmark court cases. Additionally, it is important to highlight how in certain countries, prosecution mechanisms have been created to ensure accountability for crimes committed against journalists which extend to other actors, such as journalist's families or their sources. By expanding the scope of prosecution measures, this provides more comprehensive protections to journalists, the integrity of their work and their rights. However, it is important to understand that political willingness in this area plays a crucial role, due to the government holding the authority necessary to create several key prosecution mechanisms, such as creating laws or specialized investigative units. This willingness may thus be linked to the observation that mechanisms under the pillar of prosecution are relatively lacking, as compared to the more widely identifiable preventative and protective measures.

Overall, national safety mechanisms for journalists can take widely varied approaches on many levels. The field of journalism is ever changing, both in terms of who journalists are and how they work, and the sources or forms of harms which they are faced with. Subsequently, these safety mechanisms must be adapted to the specific circumstances which journalists in a particular country encounter. It is also important that the perspectives and interests of journalists are at the core of mechanisms which aim to safeguard them. The

importance of journalists and of their work must be internalized and understood in order for safety mechanisms to adequately protect them.

Annex 1: Summary of Mechanisms Found

Upon request from our partner, below is a summarized table of all the mechanisms which were found over the course of this project. This includes mechanisms discussed throughout the report, as well as other mechanisms omitted to ensure the brevity of this report. The mechanisms which are explained within the report are marked by an asterisk (*).

Country Specific Approaches		
Country	Mechanism	
Mexico	Protection Mechanism for Human Rights Defenders and Journalists*	
Mexico	Law for the Protection of Human Rights Defenders and Journalists*	
Honduras	National Protection System for Human Rights Defenders, Journalists, Social Communicators and Justice Operators	
Colombia	National Unit for Protection*	
Indonesia	LBH Pers*	
Somalia	Special Prosecutor for Crimes Against Journalists	
Sweden	National Action Plan to Safeguard Freedom of Expression*	
Ukraine	Journalist Solidarity Center*	
Ukraine	2402 Fund*	
Malta	Public Inquiry into the Assassination of Daphne Caruana Galizia*	
Italy	Central Bureau of Inter-Forces for Personal Security	
Serbia	Commission for Investigating Murders of Journalists*	

Strong Political Approaches		
Country	Mechanism	
Paraguay	Roundtable for the Safety of Journalists*	
Uruguay	Uruguay Broadcast Bill	
Chile	Model Law for the Protection of Journalists and Communications Workers	
Pakistan	Sindh Protection of Journalists and Other Media Practitioner Act*	

India: Tamil Nadu	ournalists Welfare Board*	
India: Maharashtra	Maharashtra Media Persons and Media Institutions Act	
Philippines	residential Task Force on Media Security*	
Portugal	Amendment of the Article 132 of the Country's Criminal Code*	
United Kingdom	lational Action Plan For the Safety of Journalists *	
Iceland	Iceland's Modern Media Initiative	
United States of America	Protect Reporters from Exploitative State Spying Act*	

Participatory Approaches		
Country	Mechanism	
Brazil	National Observatory of Violence Against Journalists *	
Ghana	Framework on Police-Media Relations and Safety of Journalists*	
Kenya	Staying Safe- A Protection Guide for Journalists in Kenya*	
Rwanda	Rwanda Media Commission*	
Tunisia	National Syndicate of Tunisian Journalists *	
Tunisia	Monitoring and Documentation Unit on Attacks against Journalists	
Montenegro	Commission for Monitoring Investigations of Attacks on Journalists	
Denmark	Danish National Plan on the Safety of Journalists and the Issue of Impunity*	
Netherlands	Agreement of the Steering Group on the Aggression and Violence against Journalists *	

Human Rights Based Approaches		
Country	Mechanism	
Paraguay	Ruling to end Impunity*	
Honduras	Law for the Protection of Human Rights Defenders, Journalists, Social Communicators and Legal Practitioners	

Guatemala	Office of the Ombudsman for Human Rights Defenders and Journalists*	
El Salvador	The Human Rights Ombudsman's Office*	
Nepal	Safety Mechanism at the National Human Rights Commission*	
Uganda	Human Rights Network for Journalists-Uganda*	
Switzerland	Plan d'action national pour la sécurité des journalistes (2023-2027)*	
Kosovo	Law on the Protection of Journalism Sources*	
Ukraine	Law on State Support for Mass Media and Social Protection of Journalists*	
Canada	Journalistic Sources Protection Act*	

Gender Based Approaches		
Country	Mechanism	
Colombia	Colombian Network of Journalists with Gender Perspective*	
El Salvador	Colectiva de Mujeres Periodistas de El Salvador [Women Journalists' Collective of El Salvador	
Cambodia	Women's Media Centre (WMC) of Cambodia, funded by UNESCO*	
Indonesia	Forum Jurnalis Perempuan Indonesia (FJPI, Indonesian Women Journalists Forum)*	
Yemen	Women Journalists Without Chains	
India	Harassment Act 2013*	
Philippines	Magna Carta of Women*	
Iraq	UNESCO Digital Women Journalist Protection Platform*	
Nepal	Forum of women journalists Sancharika Samuha (SAS)*	
Afghanistan	Afghan Journalists Safety Committee (AJSC)	
Africa	Women in Media Network (Graça Mahel Trust)	
Kenya	Female-specific capacity building (training) by International Association of Women in Radio and Television (IAWRT)	
Somalia	Women Media Forum*	

Sudan	Training of female journalists by local groups and UNESCO*	
Uganda	Jganda Media Women's Association	
France	Law on Sexual and Sexist Harassment 2018*	
USA	Violence against women act	

Strategic Approaches		
Country	Mechanism	
Brazil	Security Manual for Protest Coverage in Brazil*	
Colombia	Consejo de Redacción*	
Pakistan	Pakistan Journalist Safety Fund*	
Iraq	Memorandum of Understanding	
Iraq	Network of Lawyers for Freedom of Expression*	
Netherlands	PersVeilig*	
Belgium	Persveilig.be*	
Slovakia	Safe.Journalism.sk (Bezpecna.Zurnalistika.sk)*	
Armenia	Committee to Protect Freedom of Expression hotline	
Bosnia and Herzegovina	Free Media Helpline	
United States of America	Local Legal Initiative*	
Australia	Protection of Public Participation Act*	

Grounded Approaches		
Country	Mechanism	
Ecuador	The Interinstitutional Committee for the Protection of Journalists and Communication	
El Salvador	Asociación de Periodistas de El Salvador (Association of Journalists of El Salvador)	

Bolivia	Press Council : El Observatorio Nacional de Medios (National Media Observatory)	
Chile	Press Council : Consejo de etica de los medios de comunicacion (Ethics Council of the Chilean Communication Media)*	
Colombia	Colombian Association of Newspaper Editors and Media - AMI	
Brasil	Associação Nacional de Jornais (ANJ)	
Peru	Consejo de la Prensa Peruana / Peruvian Press Council*	
Paraguay	Sindicato de Periodistas del Paraguay (Union of Journalists of Paraguay)	
Indonesia	Press Council*	
Cambodia	Press Council*	
Tanzania	Media Council of Tanzania*	
Kenya	Media Council of Kenya*	
Somalia	National Action Plan by Journalists*	
Italy	Coordination centre on the phenomenon of acts of intimidation against journalists*	
Latvia	Memorandum of cooperation to ensure effective action on the safety of journalists	
Serbia	Agreement on cooperation and measures to increase the safety of journalists*	
Belarus	Belarusian Association of Journalists	
Finland	Journalist Support Fund	
Australia	Press Council	
United States of America	Media Council Hawaii	

Annex 2: Bibliography of Useful Existing Literature

Below is a compilation of sources which were particularly useful for the identification of safety mechanisms.

Organisation	Resource	Link
International Media Support	Defending Journalism, How National Frameworks can protect Journalists and address the issue of impunity, A comparative analysis of practices in seven countries	https://www.mediasupport.or g/publication/defending-journ alism
ARTICLE 19 Europe	Directory of initiatives on the safety of journalists in Europe: Media Freedom Rapid Response	https://www.article19.org/wp- content/uploads/2022/05/A19 _MFRR-Directory-SoJ-Europe _FINAL_26-May.pdf
UNESCO	An Attack on one is an attack on all: successful initiatives to protect journalists and combat impunity	https://unesdoc.unesco.org/ark :/48223/pf0000250430
International Press Institute	Press Freedom & Safety of Journalists in Africa: Challenges & Recommendations	http://ipi.media/wp-content/up loads/2021/12/KAS-IPI-Repor t-on-Safety-of-Journalist-in-A frica-final-29.11.2021.pdf
UNESCO	Quadriennial Report 2018-2021: Multi-Donor Programme on Freedom of Expression and Safety of Journalists	https://unesdoc.unesco.org/in/documentViewer.xhtml?v=2.1 .196&id=p::usmarcdef_00003 81507&file=/in/rest/annotatio nSVC/DownloadWatermarked Attachment/attach_import_74 f6c18c-efa9-42b7-8437-c3e 12740c19e%3F_%3D381507 eng.pdf&locale=en&multi=tru e&ark=/ark:/48223/pf000038 1507/PDF/381507eng.pdf#M DP_Report_2022_Apr29.indd %3A.130501%3A512
Council of Europe	Implementation Guide	https://www.coe.int/fr/web/fre

	edom-expression/implementa
	tion-guide

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