

Unpublishing the News: An Analysis of U.S. and South Korean Journalists' Discourse About an Emerging Practice

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One axiom of the digital age is that online is forever. Such imperishability of information has led an increasing number of news subjects and sources to request that stories containing outdated or negative personal information be “unpublished.” These requests confront news practices and ethical guidelines related to privacy, accuracy, harm, and autonomy, which complicates newsroom responses. U.S. and South Korean journalists' discourses about unpublishing demonstrate that those in a more individualistic culture (U.S.) highlight obligations related to accuracy and autonomy, while those in a more collectivistic culture (South Korea) highlight obligations related to individual privacy and avoidance of harm.

Keywords: journalistic routines, ethics, privacy, corrections, autonomy, comparative research

The life span of news on the Web can be both very brief, thanks to the ease with which news can be updated, and very long, given the Web's seemingly limitless storage capacity. That news is both fleeting and (virtually) permanent has complicated how news organizations understand and align journalistic norms and practices regarding accuracy, privacy, and accountability. On the “fleeting” side, the speed and ease of correcting and updating digital news has highlighted news organizations' ongoing struggle to negotiate the tension between publishing information first and publishing accurate information. On the “permanent” side, the ability to store and easily access published news—records previously maintained in relatively obscure file cabinets and videotape libraries—has generated a surge of requests from news sources and subjects to delete, or “unpublish,” information, often in the name of privacy. An article on the website of the Poynter Institute, a U.S. journalism training organization, summarized the issue this way:

The cause is obvious—people routinely get Googled by potential employers, dating partners or the just plain curious. That 20-year-old drunk and disorderly arrest has a way of popping to the top of the list. A remedy is less clear. Most newspapers have had a longstanding practice of removing published stories only under extraordinary circumstances. But does that still make sense in the digital era as the potential rises for damaging people's reputations with long ago or out-of-context accounts of their misdeeds? (Edmonds, 2016, para. 2)

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The rise in unpublishing requests is connected to the broader discussion of individual privacy and control over one's personal data and reputation sparked by the "right to be forgotten" ruling in 2014 by the Court of Justice of the European Union. While the Court's ruling requires search engines, not news organizations, to comply with certain unpublishing requests, the Court acknowledged that resolving such requests would involve striking a balance between individual rights regarding personal data and freedom of expression of the media. So it is perhaps unsurprising that even while the court's ruling applies only in EU countries, its repercussions are felt in discussions regarding privacy and autonomy far beyond those borders. More recent revelations that Facebook mishandled access to its platform and millions of its users' personal data (Rosenberg & Frenkel, 2018) likewise reflect rising concerns about privacy.

This study seeks to understand how journalists in the U.S. and South Korea, who are not subject to the ruling, but nevertheless are handling an increasing number of unpublishing requests, understand and express the norms and values they bring to the task of making unpublishing decisions. Specifically, this study compares discourse surrounding a voluntary practice—responding to unpublishing requests—by journalists working in distinct national and journalistic cultures. In the U.S., as the aforementioned Poynter Institute article suggests, only "extraordinary circumstances" seem to warrant unpublishing under American journalism norms. The press in Korea, in contrast, is accustomed to handling unpublishing requests from powerful figures in politics and business, but now is negotiating how to apply the same norms to requests from ordinary people. Comparing U.S. and Korean journalists' discourses regarding unpublishing offers an opportunity to better understand how norms and values related to individual privacy and journalistic autonomy guide practice in different journalism contexts, as well as how journalists are navigating the new capacities and challenges of the digital era.

Cultural Contexts for Unpublishing Practices

As democratic societies sharing similar core political ideologies (e.g., broadly identifying democracy with freedom and liberty), the U.S. and Korea diverge in their perceptions of what, exactly, constitutes democracy in ways that are psychocultural (Szalay & Kelly, 1982). To Americans, the meaning of democracy centers mostly on an individual's active participation in the political process (i.e., elections, campaigns), whereas to Koreans, democracy is perceived mostly in terms of its larger ideals and doctrines shared by alliances of free (as opposed to Communist) nations (Szalay & Kelly, 1982). Likewise, although the U.S. and Korea rank close to one another in worldwide indices of press freedom (Freedom House, 2017; Reporters Without Borders, 2018), the press histories of the two countries are hardly alike.

Korea's history of press freedom has been closely tied to the country's political history, commonly characterized as an ongoing tension between the state and press under authoritarian and democratic regimes (Han, 2015; Kang, 2016; Shin, 2012). While press freedom has increased since democratization in 1987, the Korean press has remained susceptible to government interference throughout the country's short history of democracy, as the state has continued to maintain a more or less firm stance in dictating the direction of the relationship (Kwak, 2005). Thus, although Korea is ostensibly a democratic country, an authoritarian style still exists to some extent in practice because of its long history of authoritarian rule (Sa, 2009a). The history of press freedom in the U.S., in contrast, is grounded in the Enlightenment-inflected ideals of the nation's founders, who saw individual free expression and a free press as necessary checks on

government power (Patterson, 2000) and therefore offered expansive protections in the First Amendment to the U.S. Constitution.

The American and Korean press both experience commercial pressures, reflecting similarities in the free-market economic contexts in which they operate. The ways in which such pressures are brought to bear, however, differ. In Korea, commercialism limits press freedom via influence exerted by powerful business conglomerates such as Samsung—influence that is often criticized as undue (Sa, 2009b). In the U.S., commercial forces can and do exert pressure on the American press (e.g. McChesney, 2012), but these pressures are linked more to general profitability concerns than the demands of a few powerful corporate actors. It is also worth noting that access to the Internet and, therefore, to online news and search is widespread in both nations.

These similarities—democratic societies with free/commercial/wired press systems—are shared by countries with otherwise markedly different histories and cultures. This combination of shared and disparate factors suggests that comparing Korea and the U.S. could offer productive insights into the role that journalistic and national cultures play in shaping journalistic practices. Unpublishing provides an apt case for comparison because it invokes issues of autonomy and privacy that resonate with deep cultural beliefs and norms, particularly those related to prioritizing individual and collective concerns. A review of the research literature addressing cultural differences at the national and then journalistic level follows.

Theory and Literature on National Cultures

National culture can be broadly conceptualized as the distinct beliefs, values, and behavioral norms of a country's people that work as basic assumptions existing beyond the conscious awareness of individuals (Schein, 2017). Attempts to examine distinct national cultures throughout different societies can be found in literature on cross-cultural differences in business and management practices (e.g., Hofstede, 2001; Laurent, 1983; Trompenaars & Hampden-Turner, 1997). This study employs Hofstede's (2001) framework, which includes the U.S. and Korea in its worldwide survey of cultural values, beliefs, and preferences.

Hofstede (2001) identified and described five key dimensions of a culture's value system that could be used to categorize and compare cultures according to their relative location along these dimensions: (1) power distance, (2) uncertainty avoidance, (3) individualism/collectivism, (4) masculinity/femininity, and (5) long-term orientation. The United States and Korea, whose journalistic cultures are the subject of the current study, differ on all these dimensions, according to Hofstede's study, and the difference with regard to individualism and collectivism—the extent to which individual interests or collective interests are prioritized—is particularly marked. These differences are manifested in the emphasis on maintaining harmony in collectivist countries, such as Korea, contrasted with an acceptance of confrontation in individualist countries, such as the U.S. The core element of collectivism is the centralization of social units and groups that bind and mutually obligate individuals. In a collectivist society, an individual's group membership forms the center of their identity, and direct confrontation may be discouraged when pitted against the larger goal of maintaining in-group harmony (Oyserman, Coon, & Kemmelmeier, 2002). Also pertinent to the present study are differences related to privacy: Everyone in an individualist culture "has a right to privacy," while those in collectivist cultures may accept that state interests can override private

interests (Hofstede, 2001). A strong preference for privacy, however, is not what defines individualism. Rather, the core element of individualism is its emphasis on personal uniqueness and independence; a preference for personal privacy and direct communication is one among many of individualism's behavioral consequences (Oyserman et al., 2002).

Of the three levels of culture proposed by Schein (2017)—artifacts, espoused values, and underlying assumptions—the work of Hofstede (2001) analyzes national cultures at the level of basic assumptions, that is, the pattern or system of taken-for-granted beliefs, values, and norms. This study posits that these broader cultural norms and values shape journalism culture—the way journalists think and act—as manifested in journalists' discourse among themselves. The notion that discourse is a primary means through which journalistic consensus about norms and practices is constructed, adopted, challenged and maintained has been asserted by Zelizer (1993), who notes that such discourse facilitates the adaptation of norms and practices “to changing technologies, changing circumstances, and the changing stature of newswork” (p. 233). Likewise, Carlson (2015) conceptualizes journalism as a “discursive field” identifiable through metajournalistic discourse in which journalists publicly discuss and evaluate news texts, the practices that produce them, or the conditions of their reception. Because understandings of journalism and journalistic practices vary across time and space, Carlson notes, examining metajournalistic discourse can help clarify understandings of journalism and journalistic practice in a rapidly changing media environment as experienced within different national and transnational contexts. Hanitzsch and Vos (2017), for example, argue that one feature of a journalism culture—the understanding of journalistic roles—is constituted discursively through a shared notion of desirable expectations (normative role orientations), reflected in institutional values, attitudes, and beliefs (cognitive role orientations), which in turn are executed in journalistic practices (practiced role performance) and later reflected on by journalists (narrated role performance). That public reflection, or narration, is where journalists in any given culture rationalize the normative suitability of their work.

Research on Journalism Cultures

Hanusch (2009) argues that incorporating a cultural dimension into work in communication and journalism studies serves as a corrective to a research literature dominated by political and economic approaches and “can contribute to a more holistic understanding of the development of journalism practices” (p. 613). Furthermore, as Hanitzsch (2007) argues, it only makes sense to refer to something like journalism culture if there are other kinds of cultures about which comparisons can be drawn. Hanitzsch (2007) identifies three levels of analysis in which journalism cultures are articulated: the cognitive level, the evaluative level, and the performative level. Of these, the performative level, where culture is evident in how journalists do their work, and “practices are shaped by cognitive and evaluative structures, and journalists—mostly unconsciously—perpetuate these deep structures through professional performance” (p. 369) is of particular interest to the present examination of unpublishing.

The debate over Asian values in journalism illustrates both the merit of factoring culture into the mix of influences shaping journalism and the need to avoid undue generalizations (see Massey & Chang, 2002, for an overview of the debate). Xu (2005) wrote that according to Asian values, freedom of the press is not considered an “inalienable natural right,” but an “earned moral right” (p. 77), where the emphasis is

on the social responsibility role of the press. Xu argued that Asian values in journalism are “intellectually connected with community-based freedom” (p. 79), thereby placing interests of the community over those of individuals; news selection and presentation would naturally prioritize social order, racial harmony, and social and political stability. Massey and Chang (2002) analyzed news articles from 10 English-language newspaper websites throughout Asia and found that harmony, measured in the study as an “absence of conflict orientation in reporting” (p. 999), was prevalent in stories that dealt with “home-related,” as opposed to international, news. However, analysis by subregion revealed that Asian values “emerged as neither convincingly pan-Asian nor even uniformly Southeast Asian journalistic norms,” but were, rather, concentrated in countries with “restrictive press freedom environments” (p. 999). So, while it may be true that journalism in Asia tends to promote values such as social harmony in a way and to an extent that is different from Western journalism, the attempt to define a distinctly Asian journalism ultimately faces the barrier that it is “highly questionable whether there is one Asian culture” (Hanusch, 2009, p. 617).

Similarly, a comparison of Anglo-American and German journalism by Hanusch (2009) demonstrates that the notion of a homogenous Western journalism is misguided. Employing Hofstede’s value systems approach, Hanusch catalogues how even among journalists assumed to share a common “Western” journalism culture, the national cultures in which journalism is embedded still leads to important differences in understandings of press freedom, the role of the press, and even the organization of journalistic work. Research drawing on Hofstede’s individualism/collectivism dimension specifically also has addressed Western and Philippine news organizations’ reporting on climate change (Evans, 2015), how Maori cultural values are reflected in Maori journalism (Hanusch, 2015), journalists’ interpretations of press freedom in East Asia, Southern Africa, and Eastern Europe (Votmer & Wasserman, 2014), and source attribution practices in Chinese and U.S. television news (Zhong, Sun, & Zhou, 2011).

The individualism/collectivism dimension also has been applied in research comparing Korean and American journalism. Y. S. Kim and Kelly (2008) found that American photojournalists adhered to an interpretive and individual-centered approach in visual reporting, whereas Korean photojournalists used a descriptive and group-centered approach in their images. Likewise, a comparison of Korean and U.S. op-ed articles on three issues—North Korea’s nuclear program, the Virginia Tech mass shooting committed by a South Korean student, and the 2008 global financial crisis—found that differences along the individualism/collectivism continuum suggested by scholars in cultural psychology (e.g., Nisbett, 2003) explained differences in articles on the Virginia Tech massacre; Korean articles used narratives focusing on groups and societies, whereas U.S. articles employed a more individual-oriented narrative (Park, Lee, & Roh, 2009).

Shahin (2016) discovered that cultural differences in attitudes toward individual privacy were related to news coverage of the right to be forgotten (RTBF) in the U.S. and Britain. The U.S. news media reflect the utilitarian approach to privacy of the American legal system—that violation of an individual’s privacy should be measured against benefits to society as a whole—even while the American public, according to surveys, may be “likely to support an RTBF-like law” (Shahin, 2016, p. 363). The British news media, in particular, *The Guardian*, discussed privacy as an inviolable individual right in their coverage of the right to be forgotten, which aligns with Britain’s legal approach and public’s attitude toward privacy.

Research addressing the right to be forgotten (though not unpublishing specifically) has also pointed to differences in Western and Korean interpretations. In contrast to the European and American interpretations of the right to be forgotten that involve removing a news article from search engine results, the Korean interpretation of the right to be forgotten goes a step further by potentially justifying the removal of a news article altogether from a news website (Mun & Kim, 2016).

Current Legal and Ethical Approaches to Unpublishing in the U.S. and South Korea

Research addressing unpublishing specifically is sparse, perhaps reflecting the relatively recent rise of the practice and the novelty of the term itself. In a survey report of 110 editors in news organizations throughout the U.S. and Canada, the Associated Press Media Editors (APME; 2009) revealed that unpublishing is rarely considered acceptable in newsrooms despite an increasing number of requests to unpublish from sources and subjects of the news. Among nine hypothetical unpublishing requests presented to these editors, only the scenario in which the news content was inaccurate or unfair gained more than half (67%) of the editors' approval. Nevertheless, the APME report recommends that news organizations refrain from unpublishing and instead update and correct erroneous news content to ensure transparency with readers. In the context of gatekeeping theory, Pantic and Vos (2015) likewise found a general reluctance among editors to unpublish, a reluctance reinforced by routine, organizational, and institutional norms aimed at preserving decision-making autonomy and a smooth workflow. Yet, despite such hesitance from news editors to unpublish, recent academic discussions in North America identify ethical considerations for responsibly and ethically handling unpublishing requests. Shapiro and Rogers (2017), for instance, recommend that news outlets carefully consider how relevant the potentially harmful information is in the present context, as well as whether the harm lies in the mere existence of the information or the information being readily and easily accessible via search engine algorithms. McNealy and Alexander (2018) urge news outlets to weigh the sensitivity of the published information against the information's news value when making unpublishing-related decisions.

Research regarding unpublishing requests in Korean newsrooms has found responses to be more complex. In an examination of Korea's Press Arbitration Commission's (PAC's) arbitration requests and results from 2005 to 2013, Koo (2015) notes that Korean news outlets have been somewhat receptive toward unpublishing, especially in situations in which an unpublishing request is made by the PAC on behalf of a private individual. In such cases, news outlets opted to privately settle an agreement with these individuals to avoid a potentially complicated arbitration procedure with the PAC. Koo further notes that major Korean news outlets have attempted to keep up with growing discussions surrounding the right to be forgotten by creating their own guidelines for unpublishing. However, these guidelines tend to be inconsistent between and within news outlets, and also lacking in transparency in their application.

Journalism ethics codes in the U.S. and Korea show subtle differences in principles regarding privacy and accuracy relevant to addressing unpublishing requests. The Society of Professional Journalists (SPJ) Code of Ethics advises journalists to "weigh the consequences" of publishing personal information of private individuals, a guideline that seems to place emphasis on the autonomy of the journalist to decide what may be potentially harmful to an individual's privacy (Society of Professional Journalists [SPJ], 2014). Korea's Internet Newspaper Code of Ethics states that online newspapers should refrain from damaging an individual's reputation and instead strive to protect his or her privacy unless the publication of personal information serves

the public's interest (Internet Newspaper Committee [INC], 2017). Likewise, Korea's Newspaper Code of Ethics advises journalists to refrain from harming the reputation of individuals and organizations in any reporting that does not serve the public's interest. The code further states that journalists may, in certain circumstances, accept requests for anonymity to protect a news source's privacy (Korea Press Ethics Commission, n.d.). Both of these codes place more emphasis on the avoidance of undue harm to private individuals, more so than the journalist's responsibility to weigh an individual's reputation and privacy against public interest.

Recent updates to the SPJ code state that journalists should "consider the long-term implications of the extended reach and permanence of publication" and "provide updated and more complete information as appropriate" (SPJ, 2014). Similarly, Korea's Internet Newspaper Code of Ethics encourages online newspapers to "quickly update with correct information if a news source reports an error in a news article" (INC, 2017). In both countries, then, ethics codes reflect concerns relevant to unpublishing requests, but address the issue in different ways. While the SPJ code stresses the responsibility of journalists to proactively maintain the integrity of news archives and provide transparency in updating information, Korean journalism codes focus more on accuracy and updates as a means to further avoid undue harm to a news subject's or source's privacy.

Research Questions

While the right to be forgotten has sparked commentary and research, particularly with respect to legislation and potential impacts on press freedom, the related practice of unpublishing has not yet been extensively examined, and not from the perspective of journalists who must square their norms and practices with the new environment of virtually "permanent" news. This study seeks to fill the gap by examining discourse regarding unpublishing among journalists in the differing national and journalistic cultures of the United States and Korea, which emphasize different principles or aspects of ethical performance. Culturally a collectivist society and politically a postauthoritarian democracy, Korea's complex mixture of collectivism, authoritarianism, and democracy also runs throughout Korean journalistic values that emphasize press freedom within the context of the larger community and the public good. The U.S. is culturally individualist and politically democratic; press freedom is highly valued in a journalistic culture that takes an adversarial stance toward government and other institutional forces. How is unpublishing understood in these diverse contexts? The following research questions were posed:

RQ1: How do journalists in South Korea and the United States describe and characterize unpublishing in discourse with other journalists?

RQ2: How do journalists' discourses about unpublishing reflect, if at all, cultural differences along Hofstede's individualism/collectivism dimension?

Method

Given the purpose of gaining an understanding of how journalists characterize a practice—unpublishing—that has implications for professional norms and values, this study looked to professional trade journals, blogs, reviews, and associations as sites where discussion of unpublishing was likely to

occur. We searched for articles and posts in a five-year time frame, starting in 2010, when the right-to-be-forgotten ruling was made.

For discourse among American journalists, we employed a two-step strategy for identifying relevant material. First, we searched Google using the terms “right to be forgotten” and “unpublishing,” which yielded articles that pointed us to several journalism trade publications. We then added these publications to our list of popular journalism trade publications and websites such as the *Columbia Journalism Review* and Society of Professional Journalists. Next, in the search bar of each publication’s website, we again used the terms “right to be forgotten” and “unpublishing,” and also added “privacy” in an effort to capture material that might reference unpublishing activities but not use that term specifically. (See the appendix for the list of websites.) A total of 35 articles published over the last five years were collected. One important note: Our search also yielded a number of articles focused specifically on the legal arguments surrounding the right to be forgotten. While these articles are noteworthy in highlighting the generally legalistic tone of much of the American discourse, they were excluded from the final sample because they did not represent discourse by or among journalists about journalism practices.

For discourse among Korean journalists, we visited websites targeted specifically to journalists and media workers and performed generic searches on the Korean Web portal Naver and on Google for any other journalist-targeted websites that we may have missed. We then searched within each of these websites using keywords similar to those employed in collecting the U.S. materials: 기사삭제 (delete/unpublish article), 프라이버시 (privacy), 잊혀질 권리 (right to be forgotten). Among the websites that were examined, five had content—news articles, press releases, blog posts, etc.—related to the purpose of our study. A total of 47 articles were collected from these websites. (See the appendix.)

We analyzed the collected materials for the ways in which unpublishing was characterized, what norms and values were discussed regarding it, what reasons or rationales were offered for unpublishing (or not), and the specific practices or methods of unpublishing discussed. The analysis followed an inductive, iterative process of close reading and discussion, in multiple stages. Specifically, a total of four researchers—two native English speakers examining the U.S. materials and two native Korean speakers examining the Korean materials—first individually read the collected articles. In the second step, the researchers met as teams (the two analyzing the U.S. material and the two analyzing the Korean material) to discuss the ways unpublishing was characterized and to offer initial impressions. Next, each researcher again went through the material, this time making more detailed notes and categorizations, which were again discussed in teams. In the third stage, the researchers went through the materials again to analyze whether and how the discourse reflected cultural differences described by Hofstede (2001). Finally, the two teams met for a joint discussion in which findings from the two sets of discourses were compared, focusing specifically on the research questions.

Findings

American Journalists' Discourse

In the materials we examined, unpublishing is described as a "last resort" (McBride, 2014), an "extreme" measure (Tenore, 2010a) to be taken only in "rare" circumstances (Silverman, 2013; Myers, 2010) with "great reluctance" (McBride, 2014). "First of all, you try never to unpublish," *Washington Post* editors instructed their staff in an email, as reported on Poynter's news wire (Silverman, 2013). The synonyms offered for unpublishing highlight the negative view that journalists hold: To unpublish is to "disappear" (Peters, 2015), "memory-hole" (Beaujon, 2014; Shafer, 2012), "vanish" (Beaujon, 2014), "erase" (Gates, 2014), or "expunge" (Tenore, 2010a) something. The right-to-be-forgotten ruling is sometimes characterized in the discourse as amounting to "censorship" (Gates, 2014; Smith, 2014a, 2014b; Sporer, 2011).

This negative, even absolutist, approach also is evident in descriptions of unpublishing as taking down a story and pretending it never happened. Unpublishing defined that way is considered unjustifiable, largely on the grounds that it violates journalism's obligations to be transparent (Clark, 2014; JournoJames, 2012; Tenore, 2010a; Watson, 2012), but also because it is seen as contrary to preserving the integrity of the historical record (Mullin, 2015; Sporer, 2011) and to serving the public interest or the public's "right to know" (Smith, 2010). Unpublishing risks undermining the public's trust in journalism (Gates, 2014; McBride, 2014; Seaman, 2015).

The rare exceptions to the "never unpublish" rule are instructive: The reasons must be "clear and compelling" (Peters, 2015) or involve "substantive" errors (Silverman, 2013). That the discourse also included references to requests made under Europe's right to be forgotten by an artist and a musician seeking removal of outdated (Smith, 2014b) or negative (Smith, 2014a) reviews suggests a view of unpublishing as addressing dubious claims and, therefore, as ripe for abuse. Errors in news judgment are too low a threshold to warrant unpublishing, the discourse suggested, though unpublishing might be appropriate in cases of plagiarism and potential risks to the physical safety of people in the news, and when a story is flawed in its premise or is so egregiously wrong that it cannot be corrected (e.g., Clark, 2014). Even in such instances, the recommended action is to first try to make changes or additions to the original story, or, if it is removed, to acknowledge the removal via a note of some kind. Any unpublishing action "should be executed in the full light of day" (McBride, 2014).

The American discourse offered a range of alternatives to unpublishing and a fairly uniform call for news organizations to develop policies to handle the increasing number of takedown requests they are receiving. Journalists fear "setting a precedent" (Tenore, 2010b) by acceding to takedown requests. The discourse also pointed to various practical and logistical impediments to unpublishing (Baker, 2012; Watson, 2012), with some journalists asserting that unpublishing is "ineffective" (Clark, 2014) or doesn't really "work" (Peters, 2015).

The interests of individuals requesting that material be taken down are not prominently represented in the American journalists' discourse, typically arising only in the context of considering threats to

individuals' physical safety. News organizations might be sympathetic to a person making an unpublishing request, but a subject or source's "regret" about a news story is not enough to justify unpublishing (Watson, 2012). The journalist, or news organization, decides what warrants removal based on his or her understanding of the public interest. The challenge to that decision-making autonomy that unpublishing represents is offered as a reason for resisting takedown requests: "Journalists should remain in control of the information they publish" (Seaman, 2015). Overall, the discourse seemed to pit individual rights—for example, privacy—against some other significant interests, including journalistic autonomy and freedom of the press, the integrity of the public or historical record, and a news organization's credibility.

Korean Journalists' Discourse

Korean journalists' discourse on unpublishing mainly centered on two issues: undue pressure on the press (from politicians, government officials, and business conglomerates), and the PAC's proposed amendment to the Press Arbitration Act in 2015. Korean journalists defined the act of unpublishing itself as either the deletion of a news article from a news outlet's website or the deletion of a news article from both the news outlet's website and shared posts on blogs and social media. The latter definition of unpublishing came from the PAC's proposed (ultimately unsuccessful) amendment, which attempted to broaden the PAC's influence to additionally include the right to request unpublishing, corrections, and updates of shared news stories on Internet-based media platforms.¹

Given that Korean news outlets face pressure to unpublish from not only private individuals but also politicians, government officials, and business conglomerates, the general reaction to unpublishing and/or the right to be forgotten in the discourse was mixed, showing both positive and negative attitudes. In the discourse focusing on cases of unpublishing in which elites in politics and business asserted pressure on news outlets, the issue of unpublishing was unequivocally discussed in a negative light. For Korean journalists, these types of unpublishing requests were viewed as "pressure" from those in power (Sei-ok Kim, 2013; Park, 2013), more specifically, attempts to "erase" any type of press coverage deemed "unfavorable to their power" (Chung, 2011). Criticism concerning unpublishing requests from political figures further extended to criticism of news editors or higher executives who accepted these requests (Chung, 2011; Kwak, 2010; Lee, 2015; Park, 2011, 2013).

In the Korean discourse that discussed unpublishing requests from private individuals and discourse concerning the PAC's proposed amendment, most journalists acknowledged a need to protect an individual's right to be forgotten and privacy generally. Still, despite some sort of an agreement—implicit or explicit—about the need to protect an individual's privacy, perspectives diverged when discussing the boundaries of the PAC's proposed amendment. Some journalists viewed the proposed amendment as a potential threat to press freedom and freedom of expression, using words such as "concern," "controversy," and "unreasonable" in their discussions of the proposed amendment (S. Choi, 2015a, 2015b; C. Kim, 2015c; Seo-joong Kim, 2015). Yet, others focused more on individual privacy, calling for a "relief system" or

¹ The PAC currently can only request that a news organization make corrections, publish articles refuting previous articles, or make some other type of compensation to individuals.

"compromising measures" to protect an individual's right to be forgotten without endangering press freedom (C. Kim, 2014).

Most often, however, positive and negative sentiments concerning unpublishing were mentioned within the same discourse; discourse that characterized unpublishing as a threat to press freedom also acknowledged a growing need to protect the individual's right to be forgotten in the current digital media environment (e.g., C. Kim, 2015a, 2015b). Likewise, discourse that called for some sort of an unpublishing procedure also included cautionary statements concerning unpublishing's potential threat to press freedom. Although opinions on unpublishing were scattered across a wide spectrum, ranging from a mostly favorable attitude to a more hostile attitude toward unpublishing, most of the Korean discourse erred on the side of caution when discussing the PAC's proposed amendment.

To be clear, the discourses against unpublishing were more against the possibility of unpublishing becoming a convenient means to censor criticism of the government and high-level government officials rather than the notion of unpublishing serving as a means to protect the privacy of ordinary individuals. Particularly in the discourse concerning the PAC's proposed amendment, the focus of criticism was on the inadequacy of the PAC's proposed amendment to serve as an effective "middle ground" solution between press freedom and the right to be forgotten.

The general argument within the Korean journalists' discourse was that Korea is not ready to adopt a law regulating unpublishing; the issue itself needs to be discussed more systematically within society in order to reach a "social consensus" (C. Kim, 2014). Unpublishing, though seen as potentially necessary and complementary in protecting an individual's privacy and right to be forgotten, was considered too much of a "premature" solution to be introduced as a policy. Rather, Korean society needed to maintain a "cautious approach" (J. Choi, 2013; S. Choi, 2015a; C. Kim, 2014). From this, we could infer that Korean journalists were not entirely against the notion of unpublishing and the right to be forgotten, provided that there would be more discussion and debate to outline the criteria for which articles to remove and how to detect invalid removal requests.

Individualist and Collectivist Approaches to Unpublishing

Much of the discourse among Korean journalists we examined centered on the advantages and disadvantages of a proposed expansion of the PAC's authority to include unpublishing. That the United States has no such government commission, much less one whose expansion might be welcomed by journalists, perhaps says all one needs to know regarding how journalistic cultures are shaped by national cultures. In the American discourse we examined, unpublishing was characterized as tantamount to censorship, even though any removal of published information would be undertaken voluntarily, not required by law. In this sense, individual interests—that is, the individual interests of news organizations in retaining autonomy—typically override other interests. Unpublishing is a last resort, appropriate only in dire circumstances involving physical or legal threats to individuals in the news, or in cases involving egregious error or plagiarism.

Korea's collectivist orientation was evident in how the discourse, particularly that focusing on unpublishing requests from private individuals, pointed toward a general acknowledgment of a need to

protect news subjects and sources from undue harm. Here, the bigger interest of the public (i.e., protecting the privacy of private individuals) takes priority over the individual interests of news organizations. This aligns with values expressed in the Constitution of the Republic of Korea, which is very strict with respect to defamation (S. Kim, 2013). It also reflects the “face culture” of Korean society, in which individuals prioritize defining themselves from the outside—that is, through a public representation of themselves built on “information acknowledged as publicly known and consensually shared” (Y. H. Kim, Cohen, & Au, 2010, p. 905). In a society where an individual’s “face” holds extreme importance, a news article that invades an individual’s privacy and harms his or her reputation may be far more socially devastating than in other cultures. For this reason, Korean news organizations may choose to unpublish a news article to avoid conflict and disruption of social harmony. Indeed, the discourse was weighted toward journalists who favor unpublishing—a position that also aligns with professional ethics codes—despite concerns regarding the negative side effects of unpublishing, such as violation of freedom of expression and the public’s right to know. An emphasis on social harmony also helps to explain why even those journalists with favorable views toward unpublishing considered attempts to legislate it “unrealistic” in the absence of societal consensus about how to do so.

Overall, the discourse among American journalists served to turn a new problem, the end of practical obscurity of published information, into simply a new iteration of an old problem, how to handle corrections. In the oft-cited example of what to do about a report of an arrest or criminal charge that later is not sustained, the recommendation is to update or amend the original story or append an editor’s note. Those correction-oriented remedies do not challenge fundamental notions about journalistic practice, nor do they seem to “consider the long-term implications of the extended reach and permanence of publication” possible in the digital era, as the SPJ (2014) Code of Ethics recommends. The focus on unpublishing as a type of correction perhaps explains why, aside from considering threats to their physical safety, the subject of the interests of people in the news is not prominent in the American journalists’ discourse. Rather, the discourse seemed to pit individual rights—for example, privacy—against some other significant interests, including journalistic autonomy and freedom of the press, the integrity of the public or historical record, and a news organization’s credibility. While those can be conceived of as public interests, sustaining credibility and autonomy of journalism could also be characterized as serving news organizations’ interests more narrowly.

How privacy appeared—or did not appear—in these discourses is important to understanding whether and how unpublishing is seen as a tool for enhancing or preserving it. While individual privacy features prominently in Hofstede’s description of the individualist orientation, the discourse among American journalists was largely silent when it came to privacy. In fact, the interests of individual subjects and sources of news, who might have reason to regret or even suffer from news coverage about them, seemed to take a back seat to the interests of news organizations and journalists in preserving the public record and their own credibility. This aligns with Shahin’s (2016) assertion that even though the U.S. news media and legal system may regard unpublishing as a threat, its privacy protections may be appealing to the American public more generally. In contrast, concerns for the historical record were mentioned only briefly in the Korean discourse; concerns regarding credibility were absent. This lack of attention to news organization interests such as credibility or, put another way, to considering news organization interests as representative of public interests suggests a different view of the role that the news media play in society. To offer a perhaps too

simple example: While Korean journalists might see engaging in unpublishing as part of their role to help individuals maintain positive relationships with the larger societal group, American journalists might see unpublishing as contrary to their role serving larger societal needs for information. In all, the definition of “individual” as sometimes referring to journalists or news organizations suggested in the American discourse presents something of a wrinkle in applying the individualism/collectivism dimension to journalism.

Discussion

Journalists in Korea and the United States, like journalists in most of the rest of the world, are facing an increasing number of requests to unpublish material from their websites. This analysis of discourse in journalism trade and professional publications suggests that American journalists view unpublishing unfavorably and in starkly black-and-white terms, while Korean journalists view unpublishing favorably, but also with some wariness about possible negative effects on press freedom were unpublishing to be legislated. The two discourses also illustrate how the differing ways that American and Korean journalists approach unpublishing reflect aspects of the national and journalistic cultures in which they operate, which in turn shape the values brought to bear when considering unpublishing requests.

A possible limitation to this study is that the word *unpublishing* is a new term in the U.S. and even more so in Korea. Although we did not rely solely on the word “기사삭제 (delete/unpublish article)” and instead combined this search term with other words such as “프라이버시 (privacy)” and “잊혀질 권리 (right to be forgotten)” in our search for unpublishing-related material, the lack of a clearly defined and consistently used term may have caused us to miss some discourse useful to our analysis.

The vast majority of articles that showed up in our search for Korean discourse pertained to the rather common practice of unpublishing articles at the request of political/government and business elites. This was not surprising considering the political history and press freedom history of Korea. Indeed, it illustrates a marked difference between American and Korean journalism practice connected to cultural values. Yet, a future study could focus more narrowly on U.S. and Korean journalists’ perceptions of unpublishing by looking at just the cases of unpublishing that involve private individuals. Case studies, complemented with interviews of journalists, would be an effective method of study.

In our analysis of American journalists’ discourse, we noted that American journalists understand news organizations’ interests (e.g., journalistic autonomy) to be a kind of individual interest distinct from the individual interests of people in the news who might make unpublishing requests (e.g., individual privacy). One question we pose for future studies examining unpublishing in U.S. newsrooms is whether similar distinctions between a news organization’s interest in autonomy and an individual’s interest in privacy would apply in an environment in which privacy concerns center as much on news that is shared as on news that is published by a news organization. In some sense, this leads us back to the case that sparked the right-to-be-forgotten ruling, in that the search engine making the news available—not the original publisher of it—was responsible for remedying the dispute.

To conclude, this comparison of Korean and American journalists' unpublishing discourse demonstrates how journalists bring cultural values to the task of responding to and incorporating new practices into their work and how, even in journalistic cultures with arguably similar ethical orientations, those broader cultural values shape how norms and values are applied to those new practices. Because the workings of culture—journalistic and national—shape our ideas and practices beyond our conscious awareness, cross-cultural comparison provides an apt opportunity to become aware of and observe cultures by drawing comparisons with others. The analysis also suggests the need for researchers employing Hofstede's value system approach to be sensitive to how individual and collective interests are defined.

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Appendix

Table A1a. List of Korean Sources.

Korean sites and publications	# of articles
PD Journal (피디저널)	9
Korea Broadcasting Journalist Association (방송기자연합회)	3
Journalists Association of Korea (한국기자협회)	29
South Korean journalist Choi Jin-soon's blog "Online Journalism" (최진순 기자의 온라인저널리즘의 산실)	3
National Union of Mediaworkers' monthly newsletter (언론노보)	3
TOTAL	47

Table A1b. List of U.S. Sources.

U.S. sites and publications	# of articles
Associated Press Media Editors	1
Columbia Journalism Review	3
Commonsense Journalism blog	1
First Amendment Center	1
iMediaEthics	6
JournoJames	1
Kirk LaPoint's TheMediaManager.com	1
Poynter Institute Media Wire	13
Poynter News University	2
Reuters media critic blog	1
Silha Center for the Study of Media Ethics and Law	1
Society of Professional Journalists	2
Stars and Stripes ombudsman	1
The Volokh Conspiracy	1
TOTAL	35