

Bruno-Fruitoso COSTA*

University Institute of Lisbon. Portugal. bruno_fruitoso_costa@hotmail.com. <https://orcid.org/0000-0003-3023-8960>

Dr. Sónia F. BERNARDES

University Institute of Lisbon. Portugal. sonia.bernardes@iscte-iul.pt. <https://orcid.org/0000-0002-6664-4859>

Dr. Joana AZEVEDO

University Institute of Lisbon. Portugal. joana.azevedo@iscte-iul.pt. <https://orcid.org/0000-0003-4741-4721>

Comparative exploration of media models and euthanasia coverage in Portugal and the United Kingdom

Exploración comparada de los modelos mediáticos y la cobertura de la eutanasia en Portugal y el Reino Unido

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Abstract

Purpose. To conduct a comparative analysis of news coverage of euthanasia in Portugal and the United Kingdom between 2016 and 2024, identifying structural and cultural differences derived from their respective media models. **Methodology.** A content analysis was applied to 1,731 news items published on the digital platforms of Expresso, Público, The Guardian, and The Telegraph. Variables examined included authorship, journalistic genre, length, topic, geographical scope, use and role of sources, and degree of explanation and contextualisation. Statistical tests with 5,000 bootstrap samples were employed. **Results and Conclusions.** Portuguese media relied more on news agencies and focused on political and national topics, but no significant differences were found in the average number of stories or in the level of contextualisation and terminological explanation. The findings partially support Hallin and Mancini's (2004) media systems models and Hanitzsch's (2007) theory of journalistic cultures, indicating that thematic sensitivity and professional routines may relativise systemic structures. **Singularities.** The study provides a replicable empirical and comparative framework that integrates macro (media systems) and meso (journalistic cultures) levels to understand how structural and cultural factors shape the coverage of ethically sensitive issues.

Keywords

Euthanasia; journalistic cultures; media models; news coverage; Portugal; United Kingdom

Resumen

Propósito. Analizar comparativamente la cobertura informativa de la eutanasia en Portugal y el Reino Unido entre 2016 y 2024 para identificar diferencias estructurales y culturales derivadas de sus respectivos modelos mediáticos. **Metodología.** Se aplicó un análisis de contenido a 1.731 noticias publicadas en las plataformas digitales de Expresso, Público, The Guardian y The Telegraph. Se examinaron variables como autoría, género periodístico, extensión, tema, alcance geográfico, uso y rol de las fuentes, grado de explicación y contextualización. Se emplearon pruebas estadísticas con 5.000 muestras bootstrap. **Resultados y conclusiones.** Aunque los medios portugueses utilizaron más agencias de noticias y se centraron en temas políticos y nacionales, no se detectaron diferencias significativas en la cantidad media de noticias ni en el grado de contextualización o explicación terminológica. Los resultados validan parcialmente los modelos de sistemas mediáticos de Hallin y Mancini (2004) y la teoría de las culturas periodísticas (Hanitzsch, 2007), sugiriendo que la sensibilidad temática y las rutinas profesionales pueden relativizar las estructuras sistémicas. **Aportación original.** Este estudio ofrece un enfoque empírico y comparativo replicable que integra los niveles macro (sistemas mediáticos) y meso (culturas periodísticas) para comprender cómo los factores estructurales y culturales condicionan la cobertura de cuestiones éticamente controvertidas.

Palabras clave

Eutanasia; culturas periodísticas; modelos mediáticos; cobertura informativa; Portugal; Reino Unido

1. Introduction

Euthanasia remains a focal point of international debate due to its deep moral, religious, legal, and cultural implications (Smer, 2024). Societies are divided over questions of autonomy, the sanctity of life, the role of medicine, and the limits of state intervention, making public discussion highly sensitive and politically charged (Crumley et al., 2019). A significant challenge in this debate is terminological ambiguity. While euthanasia is commonly understood as the right to die without pain or suffering with medical assistance, it is one of two principal forms of medically assisted death. In euthanasia, the physician administers the fatal medication. In assisted suicide, the individual self-administers it (Jaye et al., 2021). In this study, the term "euthanasia" is used broadly to encompass both practices, aligning with its prevalent usage in academic, journalistic, and public discourse.

The legal status of euthanasia varies globally. It is permitted in ten US states and several countries, including Canada, the Netherlands, Belgium, Spain, Australia and New Zealand (Walsh, 2024). Terminal oncological diseases (those occurring during the final six months of life) are the most prevalent factor in euthanasia requests (Rahimian et al., 2024). Cancer rates continue to rise and remain the second leading cause of death worldwide (Bray et al., 2024). In the coming decades, significant proportions of both Portuguese and British populations are expected to develop oncological diseases (Carrapatoso & Sampaio, 2022; Smittenaar et al., 2016). The transition to a hospital setting for dying has rendered the end-of-life process a more solitary and mechanical experience, heightening the aversion to agony during the final hours or days preceding death (Costa et al., 2026). Approximately 71% of deaths in Portugal (Gomes et al., 2018) and 90% in the UK (Marie Curie, 2023) experience this phase, with cancer as the primary cause.

Palliative care systems differ substantially between the two countries. The UK pioneered hospice care in 1967, developing one of the most advanced palliative care systems globally (Saunders, 2008). Portugal implemented its public system only in 2004 (Resolução do Conselho de Ministros n.º 129/2001, 2001) and faces significant financial constraints, leaving many citizens without access (Marques et al., 2023). Valery (2024) argues these contrasts enable the British to debate euthanasia with greater openness.

Euthanasia law was approved in Portugal in 2023 through confirmation by an absolute majority in parliament, bypassing the fifth presidential veto (Lei n.º 22/2023, 2023). However, in 2025, the Constitutional Court declared it unconstitutional for the third time, suspending the regulatory process. In the UK, assisted suicide remains criminalised in England, Wales, and Northern Ireland. In Scotland, individuals may face prosecution for aiding death. The British Parliament is currently drafting a bill supported by the House of Commons at the end of 2024 (Clarke, 2025). The most recent parliamentary refusal to legalise euthanasia occurred in 2015 (Brahde, 2024). Public mobilisation intensified in 2024 following television presenter Dame Esther Rantzen's public declaration of her decision to opt for the Swiss clinic Dignitas, leading to a petition with over 200,000 signatures (Francis, 2024). According to the 2022 European Values Study (Costa, 2025), the British population demonstrated an average justification for euthanasia of 6.55 points on a scale of 1 to 10 (1 being "never justified" and 10 being "always justified"), compared to 4.86 points in Portugal. In Portugal, 75.6% of participants stated they were religious, 91.8% of whom identified as Catholics. In the UK, less than 40% declared any religious affiliation, with Protestantism being the most prevalent (39.5%).

Euthanasia, dying, and death are recurrent themes in news media coverage (Booth & Blake, 2022). These topics satisfy several established news values, including negativity, surprise, social significance, and institutional response (Harcup & O'Neill, 2001). Recent research has shown that news media can reinforce pre-existing attitudes (Jang, 2019), heighten death-related anxiety (Chen et al., 2022), and influence individuals' desire for self-knowledge concerning their own mortality (Khoo, 2018). The media's role in shaping public attitudes toward euthanasia is mediated by contextual factors such as legislation and media polarisation (Costa et al., In press). Moreover, affective elements—such as personal experiences—and situational conditions—such as the broader sociocultural context—also contribute to shaping these attitudes (Van Brussel, 2018). Prior studies have investigated media representations of euthanasia (Sarmiento-Medina et al., 2019; Weicht & Forchtner, 2023), end-of-life decision-making (Hildén & Honkasalo, 2006; Van Brussel et al., 2014), euthanasia-related deaths (Han, 2019; Lauffer & Baker, 2020), and criminal proceedings associated with such cases (Banerjee & Birenbaum-Carmeli, 2007; De Hert et al., 2023).

Despite this body of work, a significant gap remains in comparative research that systematically integrates media systems models (Hallin & Mancini, 2004) and the theory of journalistic cultures (Hanitzsch, 2007) to understand how institutional structures and cultural orientations shape journalistic practices. Media systems theory enables analysis of how political, professional, and market structures shape national media ecosystems. The theory of journalistic cultures explores journalists' professional roles, ethical values, and epistemological beliefs, offering deeper insight into news production routines. Combining these frameworks facilitates comparative analysis between Portugal (associated with the polarised pluralist model) and the UK (within the liberal model) (Hallin & Mancini, 2004; Papathanassopoulos &

Miconi, 2023). This study sought to identify and compare patterns of journalistic coverage of euthanasia in Portugal and the UK between 2016 and 2024, analysing authorship, format, size, theme, geographical scope, sources, terminology, and contextualisation (Hanitzsch, 2007; Hanusch & Hanitzsch, 2017).

This comparative framework guided two research questions and examined euthanasia coverage in four quality newspapers: *Expresso* and *Público* (Portugal), and *The Guardian* and *The Telegraph* (UK). These outlets were selected based on their status as established reference newspapers, their dominance in the digital news sector, and their ideological diversity—particularly in the UK case, where centre-left and centre-right perspectives were represented (Newman et al., 2025).

RQ1: What patterns characterise the news coverage of euthanasia in the two countries?

RQ2: What are the statistically significant differences between the national contexts in terms of authorship, format, size, theme, geographical scope, sources, terminology, and contextualisation of the stories?

2. News media and euthanasia

Technological advances have had a profound impact on the technical aspects of news gathering, dissemination, writing styles, and presentation (Singer, 2011). Nevertheless, these developments have not resulted in a shift in the way news exerts its civic influence on the decisions individuals make. Furthermore, these changes have not eradicated the influence of editorial decisions, individual journalistic practices, and broader structural, political, and cultural conditions on news production (Harrison, 2019). Digital platforms have also introduced new methods through which news audiences decide to interact or avoid involvement with the news ecosystem (Bruns, 2018). It is incumbent upon audiences to decide how intensely and in what way they connect to the growing (hyper)mediation of shared values (Pasquali et al., 2022). In the field of comparative media research, Hallin and Mancini's (2004) typology of media systems emerges as a seminal model. This typology employs a dimensional classification framework, categorising Western democracies into three distinct models: liberal, democratic corporatist, and polarised pluralist. The model places particular emphasis on four key dimensions that serve to differentiate media systems, namely political parallelism, journalistic professionalism, the role of the state, and the structure of the media market. These dimensions offer valuable analytical insights for assessing how journalistic routines vary between contexts. It is acknowledged that, despite Hallin and Mancini's (2004) model operating at the macro level of media structures, it can be complemented by meso-level perspectives, such as Hanitzsch's (2007) theory of journalistic cultures. This lens considers the cultural and normative orientations of journalists in different countries, including dimensions such as role perception, autonomy, and loyalty. In this sense, the systemic structures described by Hallin and Mancini (2004) can be said to influence but do not fully determine the professional norms and daily practices of journalists.

The UK, classified as belonging to the liberal model (often referred to as Anglo-American), experienced early industrialisation, limited government intervention, strong rational-legal authority, moderate and individualised pluralism, and majoritarianism. These developments enabled commercial newspapers to emerge and flourish with minimal state intervention, thereby demonstrating a notable degree of journalistic autonomy and stringent professional standards that prioritise objectivity and balance (Brüggemann et al., 2014; Cushion et al., 2017; Hallin & Mancini, 2004, 2012, 2016; Papathanassopoulos & Miconi, 2023). In contrast, Portugal typically fits into the Mediterranean polarised or pluralist model, which is more common in southern Europe. This is a country where liberal institutions developed later (including capitalist industrialism and political democracy). The model is characterised by strong political parallelism, lower levels of journalistic autonomy, weaker traditions of professionalisation, and difficulties in clearly distinguishing between news and opinion (Hallin & Mancini, 2004, 2012, 2016; Humanes et al., 2013; Kaiser & Königslöw, 2019; Papathanassopoulos & Miconi, 2023). This phenomenon persists in the digital age, as evidenced by the ongoing convergence of Southern European media systems with those of the north, driven by the increasing significance of digital platforms (Papathanassopoulos et al., 2023). For instance, the accelerated integration of digital platforms precipitated a shift in the Portuguese media landscape, characterised by a diminution in the influence of conventional state oversight, concomitant with an augmentation in fragmentation and an exacerbation in uncertainty for established media outlets (Papathanassopoulos et al., 2023). This digital adjustment reveals that the historical indicators of the polarised pluralist model persist, but it also demonstrates that the media systems of Southern Europe are following complex transformation trajectories, where elements of change and continuity coexist (Hallin & Mancini, 2016).

Structural and professional distinctions shed light on key journalistic routines, such as decisions around authorship, format, length, thematic focus, and geographical scope; the sourcing, identification, and function of information sources; the clarification of technical terms; and approaches to contextualising the topic (Hallin & Mancini, 2004; Hanitzsch, 2007; Tuchman, 1978). According to Hallin and Mancini

(2004), liberal media systems typically operate according to commercial and competitive imperatives, underpinned by a high degree of professional autonomy. In such audience-orientated journalistic cultures, greater human and editorial resources are available, which foster a stronger emphasis on timeliness, objectivity, plurality, impartiality, and the scrutiny of those in power (Hanitzsch, 2007). This enables newspapers to address diverse readerships with varying perspectives and preferences (Schudson, 2001). These characteristics are often linked to a higher volume of news output, particularly on topics of substantial public interest, resulting in more extended and sustained coverage cycles. By contrast, the polarised pluralist model is marked by greater politicisation, lower levels of commercialisation, and reduced editorial autonomy (Hallin & Mancini, 2004). In such contexts, journalists tend to privilege information from political elites (Hanitzsch, 2007). These features can limit editorial independence and staff capacity, resulting in fewer news stories and a concentration of coverage during periods of political activity, crisis, or institutional conflict. As a result, coverage is more episodic and often relies more on news agencies for content (Brüggemann et al., 2014; Mancini, 2012).

The literature indicates that short news stories represent the quickest and most prevalent format across media systems and journalistic cultures, largely because they demand fewer resources and minimal staff input (Esser & Umbricht, 2013). Newspapers within the liberal model are especially known for producing more in-depth coverage, often featuring a broad range of contrasting viewpoints and employing the inverted pyramid structure to foreground key facts (Tuchman, 1978). Such outlets also commonly attribute statements directly to their sources, highlighting what was said or done (the subject role), typically using quotation marks. In contrast, newspapers that align with the polarised pluralist model tend to rely more heavily on elite sources (Esser & Umbricht, 2013; Mancini, 2012). The inclination to prioritise domestic events is particularly noticeable in media cultures where editorial agendas are rooted in national political discourse and there is less emphasis on international coverage (Pollock & Yulis, 2004). This pattern holds true for polarised pluralist newspapers, where a journalistic culture centred on national public responsibility tends to reinforce this domestic focus (Hanitzsch, 2007).

Media systems and journalistic cultures can also influence the explanation of terminology and the inclusion of contextual information about the story (Tuchman, 1978). Evidence of these differences was found in studies on the coverage of euthanasia. Sarmiento-Medina et al. (2019) identify content errors and superficiality in the treatment of the concept of euthanasia. Racine et al. (2008) detected inaccuracies in the information provided on diseases and clinical prognoses. Following this line of argument, it can be posited that stricter standards of verification and transparency are more likely to be associated with the liberal model (Esser & Umbricht, 2013; Hanitzsch, 2007). Consequently, the following predictions were made:

Hypothesis 1: The UK published a greater volume of news stories on euthanasia than Portugal between 2016 and 2024.

Hypothesis 2: Portuguese newspapers rely more heavily on news-agency content, while UK outlets produce more original and longer stories.

Hypothesis 3: British coverage exhibits higher levels of source identification, terminological explanation, and contextualisation than Portuguese coverage.

3. Method

3.1. Sample and procedures

The data for this study were retrieved from news stories on euthanasia ($n = 1731$) that were published on the digital platforms of the Portuguese newspapers *Expresso* and *Público* and on the British newspapers *The Guardian* and *The Telegraph*. The stories encompassed a variety of forms, including news, extended interpretative journalism, interviews, editorials, opinion columns, and letters to the editor. The selection of these media was predicated on their status as quality newspapers, their position as the most widely read established traditional media in each country, and their dominance in the online news sector, as evidenced by the highest number of paying customers (Newman et al., 2025). In consideration of the widely held perception that Portuguese newspapers strive for impartiality rather than strict neutrality in political orientation (Costa & Antunes, 2024), the British newspapers *The Guardian* and *The Telegraph* were selected to represent the centre-left and centre-right political spectrums, respectively (García-Blanco & Bennett, 2021). This choice was made with the intention of ensuring a wider ideological diversity of sources and avoiding possible bias in the results. The stories of the Sunday newspapers, *The Observer* (*The Guardian's* sister newspaper) and *The Sunday Telegraph* (*The Telegraph's* sister newspaper), were also included because they are independent of their weekday counterparts, have different journalists in their newsrooms, and often take different political positions.

The corpus of stories published between 1 January 2016 and 1 January 2024 was considered. This period encompasses the two years leading up to the introduction, discussion, and vote on the first

bill to decriminalise euthanasia in the Portuguese parliament (2018) and marks the timeframe during which there is a paucity of academic research regarding the British media's coverage of the public discussion surrounding euthanasia (Costa et al., In press). A researcher specialising in programming was tasked with the development of a tool for the automatic extraction of stories from newspaper websites. This tool was to be made available free of charge, both for the present study and for future research. The Guardian/The Observer API was the only means by which software in Python could be created, and the newspaper's team assisted with the iterative programming process (Santos, 2024). The search engines of the other newspapers' websites were manually utilised to extract the stories. A comprehensive collection of stories encompassing the following terms was conducted: "euthanasia", "medically assisted death", "assisted suicide", "assisted death", "palliative care", "pain and agony", "end-of-life care", "terminal illness", "mercy killing", "right to die", "euthanasia tourism", "death tourism", "assisted suicide abroad", and "suicide travel". In the subsequent phase of the analysis, any stories that did not feature euthanasia as a central theme were excluded from the sample.

Each news story included in this study constitutes a distinct unit of analysis, coded individually according to a defined set of variables. These variables were specifically designed to probe how media systems and journalistic cultures shape the portrayal of euthanasia in the Portuguese and British press. The variable framework was constructed by integrating instruments from the sixth and most recent Global Media Monitoring Project (GMMP) with insights from a thorough literature review (Costa et al., In press) and was carefully operationalised to support rigorous content analysis (Krippendorff, 2019). The GMMP, launched in 1995, systematically monitors gender representation in news media across diverse countries and contexts. The project is conducted every five years, with data collection taking place on a single, confidentially chosen day (Macharia, 2020).

The publication date for each story was first coded by year (2016–2024), country (Portugal or UK), and newspaper (Expresso, Público, The Guardian, or The Telegraph). Authorship was then classified according to the type of author identified, distinguishing journalists, news agencies, and readers, among others. This approach enabled a nuanced assessment of professionalisation within the production process. The journalistic genre was determined by the story's structure and purpose, covering categories including news reporting, interviews, and opinion pieces. Story length was categorised in intervals (less than 1,000 words, 1,000–2,000 words, and so on), serving as an indicator of the depth of coverage. The primary theme of each article was coded by its main subject area (legal, medical, ethical, political, religious, etc.), and the geographical scope was also coded, differentiating between local, regional, national, or international events. Regarding sourcing, the total number of quotations or references to human sources was counted, encompassing both direct quotes and paraphrased statements. Each source was classified by occupation (e.g., politician, health professional, lawyer, citizen, or religious representative) and further coded by their function within the narrative (such as main subject, expert, or personal testimony). The terminology used to describe euthanasia practices—such as "euthanasia", "assisted suicide", or "dignified death"—was systematically coded, alongside the extent to which these terms were semantically explained. Finally, the presence of contextualising elements was evaluated, specifically whether legal, historical, or social frameworks were provided to promote deeper understanding. Full details of the dimensions and coding categories are described in the codebook, which has been made publicly available with the dataset: <https://doi.org/10.17605/OSF.IO/DRJ4Z>

The Krippendorff alpha was utilised to evaluate the inter-coder reliability of the coding scheme variables (Marzi et al., 2024). This statistical measure is particularly suitable for studies that apply content analysis with different levels of measurement (Hayes & Krippendorff, 2007). The coding of 10% of the sample was provided by a researcher external to the project, and this was then statistically compared with the data coded by the first author. Most variables, including identification number, year of publication, country, media, author, journalistic genre, story size, main theme, geographical scope, number and occupation of sources, and specific terminology, achieved values ranging from 0.824 to 1.000, indicating high reliability. Two variables fell slightly below the commonly accepted threshold of 0.8: the role of the source of information (0.751) and the explanation of terminology (0.782). The presence of contextual information scored just above the threshold at 0.801. The Krippendorff alpha coefficient was calculated to have an average value of 0.931, demonstrating robust reliability throughout the coding process (Krippendorff, 2019), with minor exceptions noted and considered in the analysis (Table 1).

Table 1. Inter-coder reliability of the coding scheme variables

Variable	Krippendorff's alpha
Identification number	1,000
Year of publication	1,000
Country of publication	1,000
Media	1,000
Author of the story	1,000
Journalistic genre	1,000
Story size	1,000
Main theme of the story	0,975
Geographical scope of the story	1,000
Number of information sources	0,996
Occupation of the source of information	0,829
Role performed by the source of information	0,751
Specific terminology	0,824
Explaining terminology	0,782
Presence of context or background information on the topic	0,801

Source: own elaboration

3.2. Data analysis

This study undertook a descriptive analysis to identify and characterise relevant variables across the Portuguese and UK samples. To compare means between groups, a parametric t-test for two independent samples was employed, supplemented by 5,000 bootstrap samples to ensure greater robustness. The dependent variables examined were quantitative measures assessed in relation to independent qualitative variables. Where appropriate, categories were recoded into broader conceptual dimensions prior to analysis. The "Count Occurrences of Values within Cases" command was used to generate numeric independent variables, quantifying how frequently each category appeared within individual stories.

Relationships between qualitative variables were examined using the Chi-Square Test, supplemented by 5,000 bootstrap samples to enhance statistical reliability. Where necessary, variables were recoded into binary form prior to analysis.

The use of 5,000 bootstrap samples enhances the robustness of the statistical inference. Robust inference is achieved by providing empirical estimations of variability and significance. These estimations do not depend strictly on parametric assumptions. This approach is particularly useful when sample distributions deviate from normality or when complex data structures are present. It complements classical parametric and non-parametric tests, such as the Chi-Squared Test or Fisher's Exact Test (Efron & Tibshirani, 1993; Wilcox, 2013). Applying bootstrap resampling ensures more reliable p-values and confidence intervals, thus strengthening the validity of the findings.

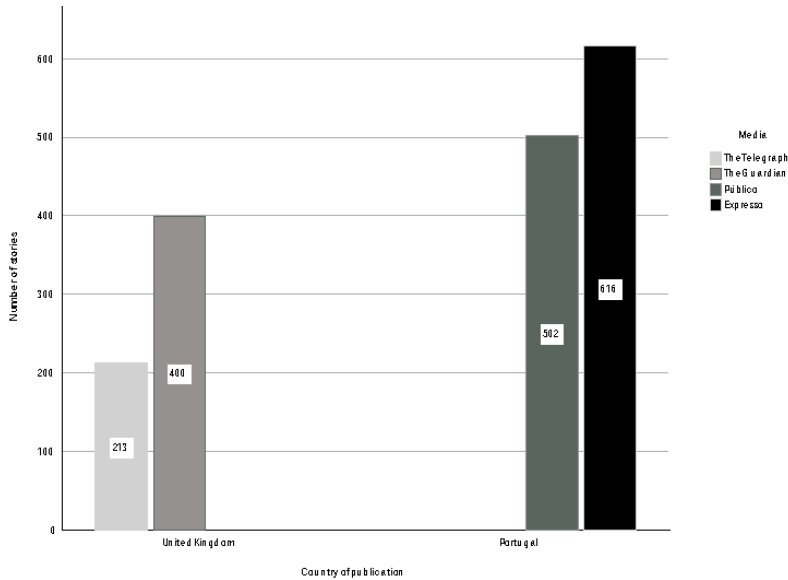
The IBM SPSS Statistics software (version 29.0) was utilised for all statistical analyses with a significance level of 0.05. The result was deemed to be statistically significant if its probability of occurring was less than 5% ($p < 0.05$).

4. Results

The sample comprises 1,731 euthanasia-related news stories published in the UK and Portugal between 2016 and 2024 (Graph 1). Overall, Portuguese media accounted for 64.6% of all stories. The Guardian

produced nearly twice as many stories as The Telegraph, while the difference between Público (502 stories) and Expresso (616 stories) was moderate.

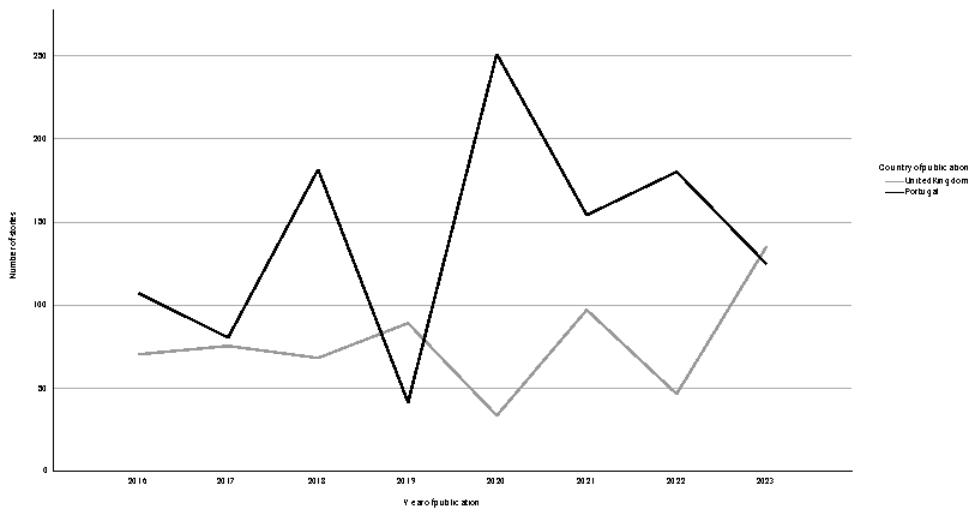
Graph 1. Number of stories published by media and country of publication



Source: own elaboration

In the UK, and particularly in The Guardian, the surge in news production that occurred in 2019 and 2021, as illustrated in Graph 2, coincided with extensive public discourse and the vote on bills to legalise euthanasia in several Australian states. In Portugal, the peaks coincide with the President's vetoes and the votes on bills. In 2023, the year in which the law was passed in Portugal, this trend underwent a reversal. The British media produced a greater number of stories than the Portuguese media, following a broad debate, civil society movements, and calls from public figures for a new law to be voted on in 2025 in the UK. Hypothesis 1 was therefore not supported, as the mean number of stories published over time did not vary significantly between the two nations ($t(1729) = -0.498, p = 0.619, d = -0.025$).

Graph 2. Number of stories published by year and country of publication



Source: own elaboration

In the UK, 50.6% of stories were authored by a media journalist, 35.2% of which were classified as news. Furthermore, it was observed that most of these stories were limited to a word count of 1000 words or less (82.9%). Additionally, it was noted that 34.1% of these stories concentrated on public or social issues, while 52.7% pertained to events that occurred within the national context (Table 2). In Portugal, 36.4% of the stories were authored by a media journalist, 43.6% were presented as news, 82.7% were limited to 1000 words, 41.7% concentrated on political issues, and 81.0% pertained to events that transpired within the national context.

A significant association was found between the country of publication and news agency authorship ($\chi^2 (1) = 124.205, p < 0.001$), indicating that Portuguese newspapers relied more heavily on news agency content than their British counterparts. After confirming that news was the predominant format overall, a significant relationship also emerged between country and news genre ($\chi^2 (1) = 8.685, p = 0.003$), highlighting distinct editorial patterns despite the shared dominance of news reporting. There was no significant difference in the average story length between the two countries ($t (1729) = 0.678, p = 0.498, d = 0.034$). Additionally, a significant relationship was identified between country and the prominence of political themes ($\chi^2 (1) = 94.697, p < 0.001$). Portuguese newspapers also exhibited a stronger focus on national events relative to UK outlets, with this difference being statistically significant ($\chi^2 (1) = 154.498, p < 0.001$). These findings provide partial support for Hypothesis 2, which posited that Portuguese newspapers would depend more on news agency material, whereas British newspapers would generate a greater volume of original and longer content.

Table 2. Distribution of the sample by author, journalistic genre, size, main theme, geographical scope of the story, and country of publication

		Country of publication					
		United Kingdom		Portugal		Total	
		n	%	n	%	n	%
Author of the story	A media journalist	310	50,6	407	36,4	717	41,4
	Two media journalists	28	4,6	59	5,3	87	5,0
	Three or more media journalists	1	0,2	7	0,6	8	0,5
	Media	22	3,6	28	2,5	50	2,9
	News agency	3	0,5	212	19,0	215	12,4
	Various	13	2,1	21	1,9	34	2,0
	Columnist or reader	233	38,0	335	30,0	568	32,8
	Not signed	1	0,2	31	2,8	32	1,8
	Editor or director	2	0,3	18	1,6	20	1,2
	Total	613	100,0	1.118	100,0	1.731	100,0
	Journalistic genre	News	216	35,2	487	43,6	703
Longer forms of interpretive journalism		153	25,0	250	22,4	403	23,3
Interview		8	1,3	29	2,6	37	2,1
Editorial		2	0,3	13	1,2	15	0,9
Opinion column		80	13,1	317	28,4	397	22,9
Letters to the director		154	25,1	22	2,0	176	10,2
Total		613	100,0	1.118	100,0	1.731	100,0
Story size	<1000	508	82,9	925	82,7	1.433	82,8
	1000-2000	91	14,8	175	15,7	266	15,4
	2001-3000	8	1,3	13	1,2	21	1,2
	3001-4000	3	0,5	4	0,4	7	0,4
	4001-5000	1	0,2	0	0,0	1	0,1
	>5000	2	0,3	1	0,1	3	0,2
	Total	613	100,0	1.118	100,0	1.731	100,0
Main theme of the story	Political issues	114	18,6	466	41,7	580	33,5
	Economic issues	1	0,2	6	0,5	7	0,4
	Medical or scientific issues	76	12,4	113	10,1	189	10,9
	Public or social issues	209	34,1	297	26,6	506	29,2
	Historical issues	15	2,4	16	1,4	31	1,8
	Religious issues	15	2,4	53	4,7	68	3,9
	Ethical issues	2	0,3	25	2,2	27	1,6
	Legal issues	17	2,8	91	8,1	108	6,2
	Judicial issues	74	12,1	15	1,3	89	5,1
	Personal or family issues	90	14,7	36	3,2	126	7,3
Total	613	100,0	1.118	100,0	1.731	100,0	
Geographical scope of the story	Local	0	0,0	2	0,2	2	0,1
	Sub-regional and regional	0	0,0	5	0,4	5	0,3
	National	323	52,7	906	81,0	1.229	71,0
	International	290	47,3	205	18,3	495	28,6
	Total	613	100,0	1.118	100,0	1.731	100,0

Source: own elaboration

The mean number of information sources in the UK was 4.99 (SD = 3.656), while in Portugal it was 3.94 (SD = 3.764). Approximately 16% of the sources of information in the UK were not identified by their occupation, and this figure was around 12% in Portugal (Table 3). Patients with temporary or permanent disabilities (9.0%), Members of Parliament (MPs) (8.7%), and doctors (6.2%) were the most prevalent sources of information in the UK. In Portugal, the most prevalent sources of influence were MPs (20.7%), political leaders (12.8%), and the President of the Republic (9.6%).

Table 3. Occupation of the source of information by country of publication with aggregated values by dimension

		Country of publication					
		United Kingdom		Portugal		Total	
		n	%	n	%	n	%
Occupation of the source of information	Head of state	26	0.85	464	10.53	490	6.56
	Politicians and public officials	780	25.50	1995	45.29	2775	37.18
	Specialists	340	11.11	418	9.49	758	10.16
	Religious figures	74	2.42	128	2.91	202	2.71
	Health and social workers	285	9.32	425	9.65	710	9.51
	Other professionals	327	10.69	131	2.97	458	6.14
	Citizens	750	24.52	331	7.51	1081	14.48
	Unidentified	477	15.59	513	11.65	990	13.26
	Total	3059	100	4405	100	7464	100

Source: own elaboration

The average number of information sources varied significantly between the two nations ($t(1729) = 5.626, p < 0.001, d = 0.283$). The descriptive data indicating that Portuguese newspapers would more often identify information sources was confirmed by a significant difference between the two countries ($t(1729) = 6.109, p < 0.001, d = 0.307$).

The analysed stories frequently focused on the actions or statements of information sources identified as subjects. In the British media, 58.9% of sources fulfilled this subject role, compared to 60.2% in the Portuguese media (Table 4). A statistically significant difference was found in the average number of subject sources used ($t(1729) = 3.755, p < 0.001, d = 0.189$), indicating that Portuguese newspapers draw more extensively on sources occupying this role than their British counterparts.

Table 4. Role performed by the source of information by country of publication

		Country of publication					
		United Kingdom		Portugal		Total	
		n	%	n	%	n	%
Role performed by the source of information	Subject	1801	58.9	2652	60.2	4453	59.7
	Spokesperson	420	13.7	907	20.6	1327	17.8
	Expert or commentator	378	12.4	484	11.0	862	11.5
	Personal experience	296	9.7	158	3.6	454	6.1
	Eyewitness	32	1.0	13	0.3	45	0.6
	Popular opinion	44	1.4	31	0.7	75	1.0
	Don't know	88	2.9	160	3.6	248	3.3
	Total	3059	100.0	4405	100.0	7464	100.0

Source: own elaboration

The most frequently used terms in the UK coverage were "assisted death" (24.2%), "disease designation" (17.0%), "euthanasia" (14.5%), and "terminal stage" (14.0%), as shown in Table 5. In Portugal, the predominant terms included "euthanasia" (32.3%), "assisted death" (21.0%), "palliative care" (8.8%), and "assisted suicide" (6.5%).

Table 5. Specific terminology by country of publication

		Country of publication					
		United Kingdom		Portugal		Total	
		n	%	n	%	n	%
Specific terminology	Assisted death	389	24.2	679	21.0	1068	22.1
	Euthanasia	234	14.5	1043	32.3	1277	26.4
	Passive euthanasia	1	0.1	20	0.6	21	0.4
	Orthothanasia	0	0.0	14	0.4	14	0.3
	Assisted suicide	189	11.7	211	6.5	400	8.3
	Medically assisted suicide	2	0.1	58	1.8	60	1.2
	Medical abstinence	0	0.0	4	0.1	4	0.1
	Dysthanasia	0	0.0	48	1.5	48	1.0
	Therapeutic obstinacy	0	0.0	43	1.3	43	0.9
	Conscientious objector	2	0.1	69	2.1	71	1.5
	Palliative care	158	9.8	285	8.8	443	9.2
	Informal carer	0	0.0	9	0.3	9	0.2
	Living wills	22	1.4	88	2.7	110	2.3
	Decision not to attempt resuscitation	0	0.0	1	0.0	1	0.0
	Health care attorney	0	0.0	10	0.3	10	0.2
	Compassionate killing	8	0.5	13	0.4	21	0.4
	Murder at the victim's request	0	0.0	36	1.1	36	0.7
	Offence of assisting suicide	2	0.1	22	0.7	24	0.5
	Agonic	1	0.1	14	0.4	15	0.3
	Agony	34	2.1	12	0.4	46	1.0
	Terminal stage	226	14.0	120	3.7	346	7.2
	End of life	32	2.0	112	3.5	144	3.0
	Persistent vegetative state	6	0.4	10	0.3	16	0.3
	Brain death	0	0.0	0	0.0	0	0.0
	Conspiracy of silence	1	0.1	0	0.0	1	0.0
	Negotiated death	0	0.0	0	0.0	0	0.0
	Palliative sedation	11	0.7	28	0.9	39	0.8
	Disease designation	273	17.0	155	4.8	428	8.8
	Others	19	1.2	125	3.9	144	3.0
	Total	1610	100.0	3229	100.0	4839	100.0

Source: own elaboration

Despite the Portuguese media employing more specific terminology, Portuguese journalists (79.8%) did not offer further clarifications to the same extent as British journalists (67.9%) (Table 6). Nevertheless, both the Portuguese media (66.5%) and the British media (62.8%) contextualised the events, enabling a comprehensive interpretation of the euthanasia.

Table 6. Explaining terminology and presence of context or background information on the topic by country of publication

		Country of publication					
		United Kingdom		Portugal		Total	
		n	%	n	%	n	%
Explaining terminology	No	396	67.9	891	79.8	1,287	75.8
	Sometimes	164	28.1	171	15.3	335	19.7
	Yes	23	3.9	54	4.8	77	4.5
	Total	583	100.0	1,116	100.0	1,699	100.0
Presence of context or background information on the topic	No	228	37.2	375	33.5	603	34.8
	Yes	385	62.8	743	66.5	1,128	65.2
	Total	613	100.0	1,118	100.0	1,731	100.0

Source: own elaboration

The association between the degree of terminological explanation and country was not statistically significant ($\chi^2(1) = 0.707, p = 0.401$), thereby refuting the expectation that British journalists would more consistently clarify all terms used in their stories. Similarly, the data did not support the hypothesis that British journalists provide more contextual or background information than their Portuguese counterparts, as no significant relationship was found between the presence of contextualisation and country of publication ($\chi^2(1) = 2.326, p = 0.127$). Consequently, Hypothesis 3 was not supported: British coverage did not demonstrate higher levels of source identification, terminological explanation, or contextualisation compared to Portuguese coverage.

5. Discussion

This comparative study of euthanasia news coverage in Portugal and the United Kingdom empirically explores how institutional structures and cultural orientations shape journalistic practices. Concurrently, it highlights the limitations of systemic determinism when confronted with thematic particularities and the dynamics of evolving digital environments. The findings provide partial validation of Hallin and Mancini's (2004) media system typology. However, both the polarised pluralist and liberal models face contestation regarding some key assumptions. Accordingly, the discussion incorporates structural and cultural dimensions. Consequently, the results are situated within broader debates on media convergence, journalistic autonomy, and the explanatory capacity of comparative frameworks in contemporary media research.

5.1. Volume and temporal patterns: national agendas and transnational triggers

Contrary to predictions, the UK did not publish a significantly higher number of euthanasia-related news stories than Portugal during the study period. The UK media produced substantial coverage of the subject, particularly in 2019 and 2021. This time frame coincided with Australian legislative reforms. However, the Portuguese newspapers maintained comparable output volumes. These peaked during domestic parliamentary debates and presidential vetoes. This result challenges the assumption that liberal media systems inherently generate more diverse or voluminous coverage due to greater market pluralism and journalistic autonomy (Hallin & Mancini, 2004). The data demonstrate that event-driven journalism, which is responsive to legislative milestones and public controversies, exerts a significant influence on euthanasia coverage in both Portugal and the UK. While this partially aligns with agenda-setting theory (McCombs & Shaw, 1972), the relationship may be mediated by newsroom routines, media ownership, political cultures, and digital platform logics, which complicate direct causal inferences (Van Aelst & Walgrave, 2011). Media attention is thus influenced by a complex interplay of structural legacies and dynamic, issue-specific factors. These factors challenge deterministic views of media system effects and highlight the need for integrative frameworks that consider both systemic structures and evolving journalistic practices.

In their empirical re-evaluation of media systems, Brüggemann et al. (2014) observed similar patterns. They noted that issue salience and political timing may override structural differences in editorial decision-making. In the context of euthanasia, a politically sensitive and ethically polarising topic, both countries' media outlets have been observed to respond to institutional triggers (parliamentary votes, court rulings, high-profile cases) that give rise to predictable news cycles. This convergence in temporal patterns aligns with findings from other comparative studies that identify issue-specific news logics as capable of neutralising systemic differences. This is particularly the case when topics resonate with universal ethical concerns or transnational policy debates (Matthews, 2021).

5.2. Source dependency and journalistic autonomy: structural continuities

The most robust systemic difference observed pertains to source dependency. A significant discrepancy was observed in the Portuguese and British newspapers' reliance on news agency content, with the former demonstrating a higher dependence on such sources. This observation aligns with the polarised pluralist model's characterisation of weaker journalistic infrastructures, lower levels of professionalisation, and a greater reliance on external content providers (Hallin & Mancini, 2004; Papathanassopoulos & Miconi, 2023). This finding is in accordance with historical patterns observed in Southern European journalism. In this region, state intervention, economic fragility, and delayed media commercialisation have been shown to constrain newsroom autonomy and investigative capacity (Herrero et al., 2017).

Conversely, UK newspapers demonstrated higher rates of original authorship by staff journalists, reflecting the liberal model's emphasis on market-driven pluralism and professional independence (Brüggemann et al., 2014; Mancini, 2012). However, a notable finding was that there was no significant difference in story length between the two countries. This outcome suggests that the structural advantages apparent in the UK do not necessarily translate into the production of more in-depth and comprehensive reporting (Trappel & Tomaz, 2021). The two samples were dominated by short-form news (under 1000 words), a phenomenon that aligns with the digital era's constraints on reader attention and the prioritisation of brevity across media systems (Esser & Umbricht, 2013). This convergence in format sheds light on the homogenising effects of digital platforms. These platforms impose similar production rhythms and editorial norms on newsrooms, regardless of national context (Mattoni & Ceccobelli, 2018).

5.3. Source identification and transparency: a paradox of professionalism

One of the study's most counterintuitive findings concerns the identification of sources. Despite the theoretical association of the liberal model with transparency, accountability, and rigorous professional standards, British newspapers exhibited a higher percentage of unidentified sources than Portuguese outlets. This outcome stands in opposition to the prevailing expectation that UK journalism would exhibit a higher level of adherence to the norms of attribution and verification, which are pivotal to the traditions of a liberal press (Cushion et al., 2017; Hallin & Mancini, 2016). A few interpretations must be given due consideration. Firstly, the thematic specificity of euthanasia – a domain involving medical professionals, vulnerable patients, and ethically fraught testimonies – may make source attribution difficult due to privacy concerns, ethical protocols, and legal constraints (Van Gorp et al., 2021). British journalists who cover end-of-life issues may prioritise anonymity to protect vulnerable individuals or to navigate the stringent data protection regulations in force. This may result in a departure from transparency norms that is driven by pragmatism. Secondly, the prevalence of letters to the editor and interpretative journalism in British coverage (as opposed to purely factual news) may reduce the necessity for formal attribution, particularly when sources are presented as illustrative rather than evidential (De Hert et al., 2023).

In contrast, the comparatively lower rate of source anonymity in Portuguese journalism may be indicative of the predominance of official and institutional sources, notably Members of Parliament, political leaders, and the President of the Republic. These individuals are typically identified by their respective titles and roles (Herrero et al., 2017). This phenomenon aligns with the polarised pluralist model's emphasis on political parallelism and elite-driven news agendas. In this model, journalists rely heavily on accessible, high-status actors rather than diverse or grassroots voices. Consequently, Portuguese coverage demonstrates increased nominal transparency. However, it may exhibit a deficiency in source diversity and pluralism that is characteristic of genuinely autonomous journalism (Fonseca, 2024; Kaiser & Königslöw, 2019).

5.4. Terminological explanation and contextualisation: professional norms vs. systemic structures

The absence of significant differences in terminological explanation and contextualisation between UK and Portuguese coverage challenges the assumption that liberal journalism inherently prioritises audience education and interpretative depth (Brüggemann et al., 2014). A comparison of the two countries' utilisation of contextual framing revealed comparable rates. Furthermore, a parallel was observed in the clarification of specialist terminology, including "euthanasia", "assisted dying", and

"palliative care". This convergence suggests that journalistic routines related to interpretative depth may be less determined by media system structures than by topic sensitivity, audience expectations, and professional norms specific to health and bioethics reporting (Racine et al., 2008; Sarmiento-Medina et al., 2019).

Hanitzsch's (2007) theory of journalistic cultures provides a valuable framework for interpreting this finding at the meso-level. Journalists who report on euthanasia – irrespective of their national context – operate within a shared ethical and discursive domain. This domain is influenced by international medical debates, human rights frameworks, and transnational advocacy networks. It can be argued that these globalised professional norms exert a stronger influence on journalistic practices than the macro-structural factors highlighted by Hallin and Mancini (2004). Furthermore, the increasing importance of digital platforms in the dissemination of news gives rise to convergent pressures regarding accessibility, searchability, and audience engagement (de la Mata et al., 2024). Such dynamics may encourage contextual framing and terminological precision as strategies to maximise reach and comprehension.

5.5. Theoretical implications: beyond systemic determinism

The findings highlight both the value and the limits of Hallin and Mancini's (2004) framework. The polarised pluralist and liberal models remain useful for identifying broad structural patterns, such as dependence on sources, political thematisation, and institutional ties. Yet they explain less about shared journalistic routines, including narrative format, contextualisation, and transparency. This gap reflects a broader issue in comparative media research. Structural models work well for mapping macro-level continuities but struggle to capture variation at meso and micro levels. These differences often stem from journalistic choices, topic sensitivity, professional culture, and the growing influence of digital technologies (Labio-Bernal et al., 2024).

New academic work has asked for more flexible, all-encompassing models that combine systemic, cultural and digital aspects (Brüggemann et al., 2014; Papathanassopoulos & Miconi, 2023). Our findings support this call. Our research demonstrates that contemporary journalism operates at the intersection of enduring structural legacies and emergent digital possibilities. This produces hybrid practices that resist neat categorisation (Costa, 2021). Future research should prioritise longitudinal, multi-topic comparisons. Such comparisons would help to determine whether the observed patterns are euthanasia-specific or indicate broader transformations in media systems.

5.6. Limitations and future directions

Several limitations should be acknowledged. First, the study is restricted to quality newspapers with high profiles and large audiences. This focus excludes broadcast media, tabloids, and digital-native outlets. As a result, the corpus does not capture the full diversity of editorial priorities, news formats, and audience engagement that characterise the broader media landscape. These exclusions may bias results toward established, mainstream perspectives and limit the representativeness of patterns identified here. Second, compiling the dataset presented technical and practical challenges. Differences in digital archiving, paywall access, and inconsistent labelling of story types and contributors across the four platforms complicated systematic data retrieval and coding. These challenges may have affected the comprehensiveness and consistency of the corpus. Third, the analysis focused on manifest content—such as source use, thematic focus, and format. This approach does not address latent aspects of coverage, such as narrative tone, ideological stance, or rhetorical strategies. Such elements could reveal deeper divergences in the framing of euthanasia (Xu & Zhang, 2023). Fourth, exclusive reliance on quantitative content analysis meant that newsroom dynamics and editorial decision-making processes were not investigated. The perspectives of journalists, editors, and audiences also remain unexplored, yet these are essential for understanding how systemic structures translate into everyday practices.

Future research should address these gaps. Qualitative interviews with journalists and editors, analysis of audience reception metrics, and comparative studies including digital-native platforms and social media are needed (Costa et al., 2026). Comparative analysis of euthanasia alongside other ethically sensitive topics—such as abortion, immigration, or climate change—would help clarify whether the observed patterns are specific to this issue or reflect broader trends in journalism cultures.

6. Conclusion

This comparative study of euthanasia coverage in Portugal and the UK reveals both the enduring relevance and the conceptual limits of structural media system typologies. The findings corroborate the fundamental predictions of Hallin and Mancini's (2004) polarised pluralist and liberal models. The Portuguese press demonstrated a marked tendency to rely on news agencies, a pronounced focus on national and political events, and a notable degree of institutional dependence. Conversely, British journalism drew on a more extensive array of sources for each story, reflecting the liberal tradition's

emphasis on journalistic autonomy and pluralism. These differences highlight the ongoing impact of systemic structures on journalistic practices, particularly in terms of source dependency and thematic orientation.

However, the study also reveals significant convergences that challenge deterministic interpretations of media system theory. No substantial differences emerged in contextualisation or terminological explanation between the two countries. Both exhibited comparable rates of interpretative framing and clarification of specialist terms. This convergence suggests that journalistic routines tied to topic sensitivity, audience expectations, and professional ethics may operate independently of systemic structures (Racine et al., 2008; Sarmiento-Medina et al., 2019). Moreover, counterintuitive findings—such as higher rates of unidentified sources in UK coverage—complicate assumptions about transparency and accountability embedded in the liberal model. These patterns point to the mediating role of thematic specificity, legal constraints, and editorial pragmatism in shaping practices that media system typologies struggle to predict.

The study thus contributes to ongoing debates about the explanatory scope of comparative media frameworks. While Hallin and Mancini's models remain valuable for identifying macro-level continuities, they offer limited traction for understanding meso- and micro-level variation. Our findings align with recent scholarship calling for more dynamic, integrative approaches that account for journalistic agency, digital mediation, and issue-specific logics (Brüggemann et al., 2014; Labio-Bernal et al., 2024). In the contemporary global context, characterised by the transformation of production routines and the dissolution of national boundaries due to transnational networks, the field of media research must adopt a more nuanced approach. It should embrace a more nuanced understanding of journalism as a hybrid, context-dependent practice situated at the intersection of structure, culture, and technology.

From a theoretical and academic standpoint, this article advances the field by testing and challenging the explanatory capacity of classic media models. It highlights the need for hybrid, context-sensitive frameworks to better account for journalistic variation, thereby contributing to the refinement of comparative media systems theory. From a professional and practical perspective, the findings encourage journalists to reflect on how editorial routines, source diversity, and professional norms can shape—and at times counterbalance—the influence of systemic structures. The study further identifies specific domains, such as transparency in sourcing and topic-driven framing, where heightened newsroom awareness and editorial reflection can foster more nuanced and accountable reporting, particularly when addressing ethically sensitive issues.

It is recommended that future research extend this inquiry in several directions. Firstly, incorporating qualitative interviews with journalists and editors would illuminate how systemic pressures translate into daily decision-making. Secondly, an examination of audience reception and engagement metrics could reveal whether observed differences in sourcing and framing affect public understanding. Thirdly, the expansion of the comparative framework to encompass digital-native platforms, social media, and broadcast journalism would facilitate a more comprehensive representation of contemporary media ecologies. Finally, a comparison of euthanasia coverage with other ethically sensitive topics – such as abortion, immigration, or climate change – would serve to clarify whether the patterns identified here are topic-specific or indicative of broader shifts in journalism cultures.

This study demonstrates that media system typologies remain indispensable heuristic tools, but they require continuous empirical refinement. Portuguese and UK journalism exhibit both structural continuities and convergent practices, reflecting the coexistence of systemic legacies and globalised professional norms. Understanding contemporary journalism demands analytical frameworks capable of capturing this complexity, recognising that structure, culture, and technology interact in ways that defy neat categorisation.

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Contributions

Task	Author 1	Author 2	Author 3
Conceptualisation	X		
Content curation	X	X	X
Formal analysis	X	X	

Task	Author 1	Author 2	Author 3
Acquisition of funds	X		
Research	X	X	X
Methodology	X	X	
Project management	X		
Resources	X		
Software	X		
Monitoring	X	X	X
Validation	X	X	X
Visualisation	X		
Drafting: original draft	X		
Drafting: proofreading and editing	X	X	X

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Declaration of conflict of interest

The authors declare that there is no conflict of interest.

Responsible declaration of use of Artificial Intelligence

Artificial Intelligence tools have not been used.

Additional materials

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