

STATE CONTROL, PRESS FREEDOM, AND MEDIA SYSTEMS: A COMPARATIVE STUDY OF THE UNITED STATES, NIGERIA, AND CHINA

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Abstract

This paper presents a comparative analysis of the government's roles in promoting strong media systems through transparency and accountability in three contrasting national contexts: the United States, Nigeria, and China. Grounded in normative press theories (libertarian, social responsibility, and authoritarian), the paper explores how media systems function within different political environments and how they either support or suppress the watchdog role of journalism. The study adopts a qualitative research design grounded in the interpretivist paradigm, relying on secondary data to examine media-state relations across different political systems, drawing on academic literature, legal documents, and institutional reports. Findings reveal that while journalism in the United States of America thrives under a liberal democratic framework, Nigeria's media operate within a fragile democracy marked by systemic challenges. In China, state-controlled media suppress opposition and prioritise party messaging, severely limiting journalistic independence. The study concludes that strong legal protections, political will, and institutional support are essential for journalism to fulfill its governance role. Recommendations are offered to strengthen media institutions, protect journalists, and encourage press freedom worldwide.

Keywords: Journalism, Mass media, Media systems, press freedom, and governance.

Introduction

The role of the mass media in today's socio-political activities of societies is quite critical (Obafemi & Edogor, 2022); thus, the media are saddled with the responsibility of holding government accountable and providing the citizens with the information they need to participate in governance (Akingbohunge, 2025). Liu (2017) and Dauda and Moses (2024) corroborate that the media remains an important public education and enlightenment tool, and the media is used to monitor and scrutinise the activities of those who are regarded as the officials of a society. However, the political setting of a country in terms of freedom of the media is the only way through which the media can fulfill its constitutional responsibility (Danso, 2025).

Therefore, the crux of this paper is to evaluate and provide comparative insights into the way the media operate in the United States, Nigeria, and China, paying attention to how media institutions in these countries either enable or constrain the quest for governmental responsibility and transparent governance.

Globally, the United States of America is seen as a country with the most friendly media environment. The media in this country is supported by strong constitutional backing and freedom to carry out its constitutional responsibility. This implies that, in the USA, the media is actively involved in holding the government accountable to the citizens. Investigative journalism in the USA is at its peak (Henshaw, 2024). Despite the rising challenges of misinformation and media consolidation, due to the advent of the new media, the media in the USA still occupy a central position in the running of public offices and other aspects of governance (Parks, 2019).

The situation is, however, different in China. China Country Report (2023) indicates that the media in China is a state-dominated structure, where media activities are strictly under the watch of the ruling Communist Party. The media in China, according to Williams (2023), function mainly as an instrument of state propaganda, promoting national unity, ideological conformity, and social stability. No doubt that there have been some landmark achievements by the media in terms of holding government accountable through its investigative reporting, the overall environment is characterised by suppression, close watch, and a strict limitation on dissenting voices (Buckley, 2018).

The press in Nigeria is characterised by two controlling measures: there is the democratic environment and some hidden close watch tactics (Pate, 2016). Pate (2016) further argues that the media in Nigeria, since its inception, has contributed significantly to the democratic journey of the country, yet media practitioners are frequently harassed, beaten, and faced with some legal constraints, which ultimately limit their capacity to demand accountability from public officials (Pate, 2016; Obafemi & Edogor, 2022). Mimiola (2024) affirms that despite the contributions of Nigerian journalists in deepening democratic

principles in the country, the country's journalism picture remains under an unstable political and economic landscape that complicates its role in governance.

This study is therefore guided by key questions that seek to deepen understanding of the relationship between political systems and journalism. It examines how different political structures and contextual factors either support or suppress journalistic accountability, while also exploring the institutional, legal, and cultural conditions that hinder or promote media transparency. Furthermore, the study considers how insights drawn from a comparative analysis can contribute to strengthening the role of journalism in promoting accountability and democratic governance on a global scale.

REVIEW OF RELATED LITERATURE

The United States: Journalism as a Watchdog in a Democratic Society

In the United States, journalism has historically thrived under a libertarian press model supported by the First Amendment, which guarantees freedom of the press (Rahman, 2016). Major media institutions and independent journalists routinely investigate government actions, corporate malfeasance, and political corruption (Rahman, 2016). High-profile examples such as the Watergate scandal, the Pentagon Papers, and recent investigative reporting on police brutality or election interference underscore the media's ability to compel public accountability (Schudson, 2008).

Despite strong legal protections, the American media landscape is not without challenges. Media consolidation has concentrated ownership in the hands of a few corporations, raising concerns about editorial bias and commercial influence (Rahman, 2016). The rise of misinformation and partisan news, particularly on cable and digital platforms, also threatens public trust in journalism. Nonetheless, the U.S. remains a leading example of how a relatively free press can hold power accountable, shape public discourse, and inform democratic decision-making (Rahman, 2016).

Nigeria: Press Freedom amid Democratic Fragility

Nigeria presents a more complex media environment, characterised by a hybrid model that straddles social responsibility and authoritarian influences. The *1999 Constitution of the Federal Republic of Nigeria* (as amended), guarantees press freedom, the Freedom of Information Act, and the country has a vibrant and outspoken media landscape, with newspapers, radio stations, and digital platforms actively covering politics, corruption, and social issues.

Historically, the Nigerian media has been instrumental in advocating democratic change, especially during the military era and the return to civilian rule. Investigative journalism, such as Premium Times' exposés on budget padding,

electoral misconduct, and public fund diversion, demonstrates the media's potential as a watchdog (Pate, 2016). However, Nigerian journalists frequently face threats, harassment, and legal prosecution, especially under vague laws like the Cybercrime Act or Sedition Statutes (Obafemi & Edogor, 2022).

Media outlets often suffer from economic dependency on government patronage or political ownership, which can skew editorial independence. Furthermore, digital activism (e.g., #EndSARS and #EndBadGovernance protests) has emerged as an alternative form of accountability, amplifying voices the mainstream media may overlook. While the Nigerian press is capable and courageous, its effectiveness is undermined by weak institutions, financial constraints, and limited access to information (Akingbohunge, 2025).

China: Media as a Tool of State Power

China operates under a rigid authoritarian press system, where journalism is subordinated to the goals of the Communist Party. All major media outlets are state-owned or tightly regulated, and censorship is enforced through advanced surveillance technologies and ideological oversight (Zhao, 2008). While journalism in China plays a role in social management, occasionally exposing local corruption to align with central party goals, it lacks the structural freedom to serve as a genuine watchdog (Lei & Tang, 2024). Investigative journalism is only permitted when it does not challenge the legitimacy of the state or the ruling party. Major platforms like Xinhua and CCTV serve as propaganda tools, shaping narratives around national unity, economic development, and political stability. Citizens and journalists alike are subject to strict legal and digital surveillance, making whistleblowing dangerous and often impossible (Xu, 2021). Despite this, moments of civic resistance and coded digital dissent occasionally surface, but they are quickly suppressed or co-opted by the state.

Table One: Comparative Insights from Secondary Data

Criteria	United States	Nigeria	China
Press Freedom	Strong legal protections, highly independent	Constitutionally protected, but inconsistently upheld	No genuine press freedom; state-controlled
Watchdog Journalism	Active and influential, despite market pressures	Present but constrained by threats and weak institutions	Severely restricted; aligned with state interests
Media Ownership	Mostly private, with growing corporate concentration	Mixed ownership, with political interference	Entirely state-owned with heavy censorship
Legal Environment	Supports investigative reporting	Restrictive laws used to intimidate journalists	Laws prioritise censorship and ideological control
Digital Activism	Expands citizen voice and media pluralism	Vital for youth mobilisation and anti-corruption	Heavily censored; dissent is criminalised

Source: The researchers’ archival data, 2026

Theoretical Framework

To properly understand the responsibility of the media in any country or society, especially as regards holding government accountable and responsible to the people, it is crucial to understand some theoretical foundations. This implies that, in understanding the functions of media in promoting good governance, there is a need for a strong theoretical foundation rooted in political communication and media sociology. Therefore, to explain the foregoing better, that is, how media systems function in the United States, Nigeria, and China, this paper focuses on three normative theories of the press, namely, the Authoritarian Theory of the Press, the Social Responsibility Media Theory, and the Libertarian Media Theory. Moreover, some aspects of Democratic Participant Media Theory were highlighted to demonstrate the increasing involvement of citizens and civil society organisations in shaping media accountability.

Libertarian Theory

Siebert, Peterson, and Schramm (1956) are the brainchild of this theory. The theory posits that the media, especially newspapers and magazines, should operate in a free environment, serving as a channel for the exchange of ideas and as a watchdog over government actions. The press here is open to everyone to participate.

The Libertarian Theory better paints the picture of the press in the United States of America. The American media environment is one that allows journalists to freely check on political excesses. Nevertheless, some critical minds like Herman and Chomsky (1988), cited in Prat and Stromberg (2011), state that sometimes economic and vested interests can still distort media independence under capitalism, a phenomenon evident in concentrated media ownership and advertiser influence.

Social Responsibility Theory

The social responsibility theory came as a result of the libertarian theory. The theory came into existence in the middle of the 20th century. Asemah, Nwammuo, and Nkwam-Uwaoma (2017) state that social responsibility is a modern theory because it was promulgated in the twentieth century. The theory came into the limelight because the press abused the freedom given to them, which they enjoyed as a result of the free press. Under every free press objective, the flow of information ought to be which gives citizens an avenue and opportunity to express themselves as well as to air their viewpoint. But due to sensationalisation and yellow journalism, this free flow of information was deterred in the libertarian system.

Against this backdrop, social responsibility theory rests on the concept of the free press acting responsibly. The press, which enjoys a privileged position under the government, is obliged to be responsible. The theory urges media practitioners to ensure representation of all facts, not siding or becoming sensational in reportage, but being balanced and unbiased. This implies that a journalist ought to protect their image by being fair, objective, unbiased, thereby reporting events/occurrences as it happens without icing or decorating it. By so doing, a journalist is mandated to win the trust of their audience through credible and unbiased reporting.

Nigeria's media system reflects this theory in principle, especially post-independence, when the press was tasked with supporting democratic development, national unity, and public accountability. However, in practice, the Nigerian media struggles with structural issues, such as poor journalist welfare, ownership bias, and limited access to information (Ojo, 2018). These constraints often limit the media's ability to fulfill its responsibility effectively, even when legal frameworks appear supportive (Oso, 2012).

Authoritarian Theory

The authoritarian theory holds that the media exists to serve the state and should be tightly controlled to prevent dissent and maintain social harmony. Rooted in pre-democratic Europe and reinforced by regimes with centralised authority, this theory suppresses the idea of journalism as a watchdog. Instead, the press is expected to amplify state ideology and support the goals of those in power (Asemah, Nwammuo & Nkwam-Uwaoma, 2017).

This theory is most clearly represented by China, where the Chinese Communist Party (CCP) exerts comprehensive control over media institutions. The state owns most media outlets, enforces strict censorship, and employs surveillance tools to monitor journalists and online content (Zhao, 2008). While investigative journalism is occasionally permitted, especially at the local level, it is strictly confined within state-defined boundaries, serving more as a governance tool than a mechanism for independent scrutiny (Buckley, 2018).

Democratic-Participant Theory (Supplementary)

Though not part of the original "Four Theories of the Press," Democratic-Participant Theory has emerged as a vital lens in contemporary media discourse. It emphasises citizen involvement, community media, and bottom-up communication structures that support inclusive governance (Asemah, Nwammuo, & Nkwam-Uwaoma, 2017). This theory is increasingly relevant in all three countries due to the rise of digital media and social platforms, which allow citizens to contribute to transparency efforts even when institutional journalism is constrained.

In Nigeria, for instance, digital activism (e.g., #EndSARS) has spotlighted corruption and police brutality, even as traditional media face limitations (Dauda & Moses, 2024). In China, despite censorship, netizens sometimes use indirect or coded language to critique governance, while in the United States, citizen journalism and social media continue to pressure public institutions and amplify marginalised voices (Lei & Tang, 2024).

Together, these theories provide a nuanced framework for evaluating how journalism functions within different political systems. While the libertarian and social responsibility theories emphasise journalistic independence and civic duty, the authoritarian theory prioritises the media as a tool of state control. The democratic-participant lens broadens the conversation, allowing us to account for how citizens themselves contribute to holding governments accountable, especially in restrictive or fragile media environments.

METHODOLOGY

This study adopted a qualitative comparative approach to analyse how journalism functions as a tool for transparency and accountability in three distinct

media systems: the United States, Nigeria, and China. The aim was to draw informed conclusions about how structural, legal, and political factors shape media behaviour in each country investigated. This study is grounded in the interpretivist paradigm, relying on secondary data to examine media-state relations across three different political systems. The interpretivist approach is appropriate because the study sought to understand how journalism operates within varying socio-political contexts, rather than to measure variables quantitatively. Thus, the methodology is grounded in desk research, with data derived from existing scholarly literature, institutional reports, legal documents, and global press freedom indices.

The research is structured as a comparative case study, focusing on three countries selected for their distinct media environments and governance systems: the United States (liberal democracy), Nigeria (developing democracy), and China (authoritarian system). This enables an in-depth contextual analysis and comparison of how political structures shape media practices and press freedom in the countries investigated. The study employs a qualitative synthesis of existing literature and reports, allowing for the interpretation of patterns, themes, and institutional dynamics across the selected cases.

Data Sources and Selection Criteria

This study relies exclusively on secondary data, drawn from credible and authoritative sources relevant to media, governance, and press freedom. These include:

- Peer-reviewed academic journal articles and scholarly books in media studies, political science, and journalism
- Reports from reputable international organizations such as Freedom House, **Reporters Without Borders** (RSF), and the Committee to Protect Journalists (CPJ)
- National constitutions, media laws, and policy documents
- Empirical case studies on journalism practices and governance in the selected countries
- Documented examples of investigative journalism and watchdog reporting

To ensure rigor and reliability, the study applies inclusion and exclusion criteria in selecting materials:

Inclusion Criteria:

- Sources published in reputable academic journals or by recognized international organizations
- Studies and reports directly addressing media freedom, journalism practices, or state-media relations

- Materials focusing on the United States, Nigeria, and China
- Publications from recent years (with allowance for seminal older works)

Exclusion Criteria:

- Non-scholarly or opinion-based sources lacking empirical or theoretical grounding
- Sources with unclear authorship or questionable credibility
- Materials not directly relevant to media systems or governance
- Duplicative studies without added analytical value

This systematic selection process ensures that the study is based on credible evidence while allowing for an interpretive analysis of the relationship between media and governance across different political contexts.

Units of Analysis

The units of analysis are the media systems of the three countries, assessed through the following dimensions: Legal and constitutional guarantees of press freedom. The purpose of choosing this unit of analysis is to be able to establish the press function in each of the countries. Furthermore, analysing the ownership and control of media institutions, the degree of journalistic independence, level of censorship or surveillance, and the effectiveness of journalism in uncovering corruption, holding officials accountable, and influencing policy is paramount. These units of evaluation become an important signpost in the study due to the fact that the research wants to uncover the different issues that affect media practice in these countries. Also, the role of citizen journalism and digital activism has become important in today's media operations. The digital media continues to shape journalism in different countries. Citizens now have open platforms such as Facebook, WhatsApp, X, Instagram, and the like, to air their voices on various issues in their respective countries. Therefore, these units were chosen to align with both normative theory frameworks and real-world governance indicators.

Method of Analysis

A thematic content analysis approach is employed to identify patterns, similarities, and divergences across the three case studies. The analysis is interpretive rather than statistical, focusing on the qualitative dimensions of press freedom and journalistic effectiveness in promoting transparency. Normative theories guide the interpretation of these findings, linking theory to context and practice.

Analysis and Discussion

This section explores how journalism functions in the United States, Nigeria, and China in promoting transparency, accountability, and good governance. Using dimensions outlined in the methodology and guided by normative media theories, the discussion reveals how media systems either facilitate or obstruct the watchdog role of journalism.

Discussion of Findings

This study examined the role of journalism in promoting transparency and accountability across three distinct political and media environments: the United States, Nigeria, and China. Using normative media theories as a framework, the analysis reveals that journalism's capacity to perform its watchdog role is directly shaped by political ideology, constitutional guarantees, legal safeguards, and institutional independence within each society.

Findings indicate that journalism in the United States operates largely within the framework of Libertarian Theory, which emphasizes press freedom and minimal government interference. This orientation is constitutionally guaranteed under the First Amendment to the U.S. Constitution (1791), which explicitly prohibits Congress from making laws abridging freedom of speech or of the press. This constitutional safeguard has been reinforced through judicial precedents such as *New York Times Co. v. United States* (1971), where the U.S. Supreme Court protected the publication of the Pentagon Papers, affirming the press's right to publish information critical of government actions.

Empirical indicators further support this libertarian structure. According to **Reporters Without Borders** (RSF), the World Press Freedom Index (2024), the United States ranks significantly higher than Nigeria and China in press freedom, despite challenges related to political polarization and corporate media ownership.

Practical evidence of public accountability includes investigative journalism such as the exposure of the Watergate scandal by *The Washington Post*, which led to President Nixon's resignation, and more recently, investigative reports on government surveillance practices and corporate misconduct. These cases substantiate Rahman's (2016) assertion that U.S. media institutions regularly scrutinize governmental and corporate actors.

Although concerns exist regarding media conglomeration and partisan reporting, institutional mechanisms—-independent courts, freedom of information laws (Freedom of Information Act, 1966), and civil society watchdogs—provide structural support for journalistic autonomy. Compared to Nigeria and China, journalists in the United States are rarely subjected to systematic state censorship or long-term detention for investigative reporting.

The study found that journalism in Nigeria reflects a hybrid model aspiring to Social Responsibility Theory but constrained by political interference, legal inconsistencies, and economic instability. While Section 39 of the 1999 Constitution of the Federal Republic of Nigeria (as amended) guarantees freedom of expression and the press, enforcement remains inconsistent.

Nigeria enacted the Freedom of Information Act (2011), designed to enhance access to public records. However, weak compliance by public institutions and a lack of whistleblower protections undermine its effectiveness. In practice, journalists face intimidation, arrests, and violence.

For example, the detention of journalist Omoyele Sowore in 2019 on charges of treason following anti-government protests illustrates political interference. Similarly, the Nigerian Government's suspension of Twitter in 2021 after it deleted the then-President Muhammadu Buhari's tweet demonstrates the government's interference in digital communication. Broadcast stations such as Channels Television have also faced fines and regulatory sanctions from the National Broadcasting Commission (NBC) for airing content critical of government authorities.

Cases of violence further demonstrate systemic vulnerability. It should be recalled that a Nigerian journalist, Dele Giwa, was assassinated in 1986 through a parcel bomb—an unresolved case that continues to symbolize impunity in crimes against journalists. According to the Committee to Protect Journalists, Nigeria has recorded multiple cases of journalist harassment, assault, and arbitrary detention.

In comparison, while journalists in the United States may face legal suits or political hostility, extra-judicial killings and prolonged detentions are rare. Conversely, in China, state repression is institutionalized and more systematic. Nigeria, therefore, occupies an intermediate position—constitutionally democratic but operationally constrained.

Findings confirm that journalism in China aligns with Authoritarian Theory, where media institutions function primarily as instruments of the state. Article 35 of the Constitution of the People's Republic of China (1982) nominally guarantees freedom of speech and press; however, these freedoms are subordinate to the leadership of the Chinese Communist Party (CCP).

Major media organizations such as *People's Daily* operate directly under CCP supervision. The Cyberspace Administration of China regulates digital content, enforcing strict censorship policies commonly referred to as the "Great Firewall." High-profile cases illustrate this control. Citizen journalist Zhang Zhan was sentenced to four years in prison in 2020 for reporting on the early COVID-19 outbreak in Wuhan. According to **Reporters Without Borders**, China consistently ranks among the lowest countries globally in press freedom and remains one of the world's leading jailers of journalists.

While China occasionally permits investigative reporting on local corruption, such reporting typically aligns with central government objectives rather than independent accountability. Unlike Nigeria, where press freedom is legally recognized but weakly enforced, China maintains institutionalized censorship through party control, surveillance technologies, and direct state ownership of media outlets.

The comparison confirms that journalism's contribution to governance and accountability is strongest where media independence is protected by law, supported by institutions, and respected by political actors. Conversely, where the state controls or undermines the media, journalism is reduced to a mouthpiece of authority rather than a check on it. The findings of the study are in line with that of Lei and Tang (2024), which contends that while journalism in China plays a role in social management, occasionally exposing local corruption to align with central party goals, it lacks the structural freedom to serve as a genuine watchdog. The finding further resonates with the position of the Authoritarian Theory because in China, the state owns most media outlets, enforces strict censorship, and employs surveillance tools to monitor journalists and online content.

Conclusion

In the United States, the media function as the cornerstone of democratic accountability, albeit with rising concerns about polarisation and commercialism of the institution. In Nigeria, the press remains vibrant but vulnerable, frequently stepping into the watchdog role despite political and economic pressures. In China, the media are constrained within an authoritarian framework, limiting their capacity to foster transparency or challenge state power.

This comparison reveals that media governance is deeply tied to broader political structures. Where democratic norms and legal protections are strong, media practice thrives; where authoritarian control dominates, the media would be compelled to be an arm of the state rather than a check on its power.

Recommendations

Based on the results of the paper, the following are recommended:

1. Governments should create and enforce policies that promote press freedom and accountability. In the United States, this includes reinforcing anti-monopoly regulations, supporting fact-checking initiatives, and promoting media literacy to combat misinformation. In Nigeria, there is a need to reform legal frameworks that enable the intimidation of journalists, while also providing public funding for independent media and training for investigative reporting. In China, although sweeping reforms may be limited under current political conditions, sustained

international advocacy can encourage greater transparency and improved protection for journalists reporting on corruption.

2. All Media practitioners should uphold ethical reporting standards that prioritize accuracy, balance, and the public interest. There is also a need to strengthen collaborative networks, such as cross-border investigative journalism, to support reporters operating in restrictive environments. Additionally, investment in digital tools and cybersecurity measures is essential to safeguard journalists and their sources, particularly in authoritarian contexts.

3. Efforts should be made to improve media literacy among citizens to enable critical evaluation of information and reduce susceptibility to misinformation. Encouraging citizen journalism and supporting local content creators can help highlight underreported issues. Furthermore, building partnerships between journalists and non-governmental organizations (NGOs) can enhance monitoring of governance and amplify accountability initiatives.

Acknowledgements

The authors wish to use this medium to appreciate God who has guided us in the process of conducting this research work.

Authors' Contributions

Dr Ade-Johnson initiated the idea of this paper and wrote the first draft; Mr Akinwumi coordinated the data gathering and proofreading, and Mr Oluodo reworked the paper based on the comments from the reviewers.

Declaration of Conflict of Interest

There was no conflict of interest with any sources or persons from the beginning to the end of the processes of this paper.

Ethical clearance

The authors sought and duly got ethical clearance from the relevant sources used for provision of the data applied for this paper.

External Funding Sources

The authors did not receive any external funding from any organization or individuals to sponsor the cost of the field work and the publication of this paper.

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