Investigative Journalism consists of specialized news articles that serve the exposure of erroneous situations in search of the truth. It is an extremely valuable form of journalism, as these news reports are frequently controversial and inconvenient but of great public interest. More often than not, they bring to light issues that involve serious crimes, corporate wrongdoing or political corruption. This study examines and contrasts investigative journalism in Portugal, Brazil and Angola, members of the Community of Portuguese-speaking countries, by carrying out a content analysis of two investigative news articles from each country considering their codes of ethics. Complementary interviews to journalists from these countries revealed their perception of the relevance of stories in the media and compliance with the codes of ethics. This study shows that investigative journalism differs from country to country due to the political background of the country, the existence of overt or covert censorship, the working environments of the journalists and their security.

Keywords: Investigative Journalism, Code of Ethics, Portugal, Brazil, Angola.

Introduction

Investigative journalism consists of a type of journalism that entails a thorough search for hidden truths with the purpose of unveiling and changing what is wrong in society and bring to justice the wrongdoers or culprits. The objective of investigative journalism is to make those who are in positions of power accountable as it “strives to play a watchdog role, overseeing the creation of more democratic and responsible governments”\(^1\). Known as Watchdog Journalism in the United States, investigative journalism is considered essential to ensure freedom and democracy by making overt what is in the common interest. This kind of journalism proves to be expensive in time, money and human capital as it involves consulting and checking a large number of sources and complying with each country’s code of ethics. Depending on the geographic location and the topic that is being investigated, the journalist often has to use his own resources and may face political resistance and censorship.

This article analyses and compares the practice of investigative journalism in Portugal, Brazil and Angola considering their codes of ethics. It builds on previous research as all three countries are members of the Community of Portuguese-speaking countries (CPLP) and belong to the Federation of Portuguese Language Journalists (FJLP). A content analysis was carried out to six investigative news articles, two from each country: the Portuguese newspaper Diário de Notícias, the Brazilian Folha de São Paulo and the Angolan Jornal de Angola. The codes of ethics of the three countries were also scrutinized. Interviews were carried out to Portuguese, Brazilian and Angolan investigative journalists to gather their perception of their country’s reality, namely the importance of investigative news reports in their national media, compliance with the country’s code of ethics.

1. Investigative Journalism

In the 60s, Tom Wolfe, Gay Talese, Norman Mailer, Truman Capote, among others, referred the existence of a new type of journalism in the United States as journalists specializing in investigative news reports were beginning to emerge in the newsrooms (Wolfe, 1973: 12). The transition to this specialized journalism is marked by the importance given to the compliance with its own codes of ethics.
The first news reports by American journalists appeared around 1955. In 1964, *The Philadelphia Bulletin* was awarded a Pulitzer Prize for an "investigative report exposing police corruption in the city" (Sequeira, 2005: 19). A decade later, in 1972, *Watergate*, the investigation carried out by *The Washington Post* exposed the espionage plan that resulted in the removal of former US President Richard Nixon and was considered "a paradigm in investigative journalism" (Sequeira, 2005: 19). Since then, several events have generated investigative reporting in the US: the My Lai massacre during the Vietnam War, the US occupation of Iraq and prisoner abuses in Abu Ghraib, prisoners on the death row in the United States, and the failure of humanitarian aid to the victims of Hurricane Katrina.

Investigative journalism has distanced itself from conventional journalism as a form of specialized journalism with its own characteristics and the main purpose of unveiling topics or stories that are hidden, either purposely by someone in a position of power, or accidentally because they are concealed behind complex facts or circumstances. The analysis and disclosure of these facts is considered of public or common interest. The investigative journalist stands out from the conventional journalist as he devotes more time and resources to an in-depth and thorough investigation stemming from hints or tips, allegations or accusations, and used data material collected on his own initiative. Mouriquand claims that this is another type of "deeper, complex and generally time-consuming" investigation (2002: 7) as it seeks to "explain, demonstrate ... dismantle mechanisms, search what is hidden, sometimes hidden, sometimes ignored" (15). The investigative journalist either works individually or as part of a team for months or even years, on a single story or topic. There are nowadays several international organizations catering for investigative journalists: The European Investigative Collaborations, The Global Investigative Journalism Network, The International Consortium of Investigative Journalists, or The Bureau of Investigative Journalism. The investigative journalist seeks to expose and draw attention to corruption or mismanagement of governments, individuals, public or private institutions and organizations, political, economic and social entities. By disseminating what is in the public interest, investigative journalism is considered essential to ensure freedom and democracy, as noted by Unesco.

The investigative journalist is named a *muckracker* for he makes overt what is uncomfortable and inconvenient to those involved in scandals, misconduct, injustice, irregularities, violations of law and lies, either individually or in organizations. Investigative Journalism reveals scandals, and shames corrupt individuals. It unlocks secrets that someone wants to keep hidden and helps establish democracy by blowing the whistle on false information contributing to a greater social responsibility. Sometimes stories are left uninvestigated as the process involves checking a large number of sources. In Portugal in 2017, Sofia Branco, the president of the Union of Portuguese Journalists, pointed out that investigative journalism is not seen as a priority because of the scarcity of time and resources. According to Sequeira (2005: 66), what distinguishes investigative journalism is precisely the real search for journalistic truth in the selection of the topics, the in-depth analysis of events and the exposure of situations that damage society. For Mouriquand (2002), investigative journalism resides in the exhaustive search for evidences to confirm specific data instead of traditional journalism that simply provides information. Sequeira adds that it requires "techniques that are not part of the routine of present day journalists" (2005: 63). As examples, he points out the exhaustive search for allegations or tips of irregular and distrustful practices left by sources. Ricardo Kotscho claims that it is in investigative journalism that the "journalist assumes a position similar to that of a detective and must fight for analysis and depth investigation stemming from hints or tips, allegations or accusations, and used data material collected on his own initiative. Mouriquand claims that this is another type of "deeper, complex and generally time-consuming" investigation (2002: 7) as it seeks to "explain, demonstrate ... dismantle mechanisms, search what is hidden, sometimes hidden, sometimes ignored" (15). The investigative journalist either works individually or as part of a team for months or even years, on a single story or topic. There are nowadays several international organizations catering for investigative journalists: The European Investigative Collaborations, The Global Investigative Journalism Network, The International Consortium of Investigative Journalists, or The Bureau of Investigative Journalism. The investigative journalist seeks to expose and draw attention to corruption or mismanagement of governments, individuals, public or private institutions and organizations, political, economic and social entities. By disseminating what is in the public interest, investigative journalism is considered essential to ensure freedom and democracy, as noted by Unesco.

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Investigative journalism follows high standards of rigor since misconduct may harm people and institutions and lead to errors that jeopardize journalistic deontology. This type of journalism also requires compliance with codes of ethics that vary from country to country, with complex links between the media, civil society, different concepts of democracy and power, and different processes of social change. In addition, many countries have poor communication infrastructures and limited access to official news records and archives. Thus, in emerging democracies, “reporters play a critical role in development” in these territories, it is not unusual for records and files to be incomplete, unduly maintained and subject to strict official secrecy or privacy laws. It should be noted that it was only in 2012 that Brazil saw the Access to Information Act (LAI) come into force. Depending on what is being investigated, the journalist may have to use his own resources and frequently encounters political resistance and censorship.

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2. All translations of Portuguese language by authors of study
4. Progressive journalist who publicly denounces political corruption
Because it is a relatively recent type of journalism, some people consider it just good journalism. Nevertheless, investigative journalism entails a deep analysis of a story or topic of public interest, an original and proactive systematic process producing new information or collecting previously available information to reveal its true meaning. This process may have multiple sources, require more resources and involve teamwork and extra time. It is very hard, sometimes monotonous and dangerous work. Investigative journalism is public service mainly led by private means of communication (though there are examples of state press investigation) and it contributes to establishing and maintaining democracy by condemning false data. The emphasis given to its impact in society differs from country to country as the impact given to the news reports that are subject to different codes of ethics.

2. Portugal, Brazil, Angola—same language, different codes of ethics

The Community of Portuguese-speaking countries (CPLP) has a historical and cultural common root that brings together the world of Lusophony and reinforces the "cooperation at the level of civil society" (Pereira, 2009: 8). The heritage elements composing its identity (Santos, 2005: 71) are Portuguese as the mother tongue, Portuguese, Brazil, Angola, Mozambique, Sao Tome and Principe, Guinea Bissau and Cape Verde founded the CPLP in 1996. In 2002, East Timor joined and later the entry of Equatorial Guinea was official. The organization is legally and financially autonomous (CPLP, 2014) and governed by a series of objectives and principles. Marques dos Santos claims that the world of Lusophony is characterized by a common bond and cultural denominator "whose expression transcends the language and is established through the connection of Portuguese-speaking cultural elements with the specific features of each of the other cultures" (2005: 80). The CPLP has made a series of efforts to implement respect for journalistic codes of ethics among its member States.

In 2009, representatives of journalists from several member States of the CPLP established the Federation of Portuguese-Language Journalists (FNJLP), an international body for the cooperation and protection of the common interests of Portuguese-speaking communicators, as well as for the promotion of the cultural heritage of the language (FENAJ, 2009). Although the FNJLP defends the "concentration of media ownership, the precariousness of labor relations and the obstacles to the free movement of journalists" (FENAJ, 2009) as common to all Portuguese-speaking countries, the presence and prominence of investigative journalism is different in Portugal, Brazil and Angola.

2.1 Portugal

Before April 25, 1974, Portugal was under a dictatorial regime with no freedom of speech or of the press. The series of news reports by Reinaldo Ferreira, Reporter X, dating to the beginning of the 20th century were considered the first breakthrough in investigative journalism in Portugal. After the April 25th revolution that ended the dictatorship, it was believed that this journalistic genre emerged with the various news articles by José Pedro Castanheira in the weekly newspapers Expresso and O Jornal. These were dedicated to exposing the much-contested purpose of the slush funds of the State Department for Employment, which came from the European Social Funds. It was only in 1993 and long after the Salazar dictatorship ended, that the Portuguese code of ethics was approved following the restoration of post-censorship freedom and the nationalization of the media. The Portuguese code of ethics for journalists comprises a definition of the journalistic profession as well as the functions, rights and duties of the journalists, editors-in-chief, reporters and collaborators. This includes the right to freedom of speech and free access to sources, the right to professional confidentiality, the obligation to exercise the activity with respect for professional ethics, the duty to inform with rigor and exemption and last but not least all forms of accountability in case of non-compliance. Over the years, several weeklies newspapers as The Independent, Expresso, and Sol have excelled in this type of journalism. Currently, several journalists are working in investigative journalism. Felícia Cabrita reported the Ballet Rose case, the Casa Pia case, the Freeport case, the Hidden Face case and the Duarte Lima case in Brazil. Miguel Carvalho reported the Portucalense University case, the Lúcio Tomé Feteira case and the secret of White Clay case. Alexandra Borges and Judite França reported the case The Secret of the Gods. Though it is claimed that Portugal now has uncensored journalism, these two last journalists and their families were threatened and forced to call the police.

2.2 Brazil

The general overview of the press in Brazil, during the 19th and 20th centuries may be divided into three phases, the initial phase from 1808 until approximately 1880; the consolidation phase, which occurred between 1880 and the 1920s and 1930s; and the modern phase up to the present (Bahia, 1964). By the mid-1970s and after many complicated years of censorship imposed by the military dictatorship, the newsrooms were free and "it was possible to find reports in the newspapers exposing actions of the government" (Sequeira, 2005: 18). In 1976, the newspaper O Estado de S. Paulo published three reports that "exposed a life of privileges and benefits by ministers and high officials" (Viedo, 2010: 17).

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9http://sand-kas-ten.org/fjm/por/capitulo_1.pdf
Ricardo Kotscho, a Brazilian journalist received the Esso Prize, thus establishing investigative journalism in Brazil which now has "a representative and spokesman for the interests of citizens" (17). The report Desendo aos porões (Descending to the Cellars), by Antonio Carlos Fon, a reporter from Veja magazine, published in 1979, gained great visibility in Brazil for exposing "torture practices of the Geisel government" a subject that was until then censored in the country (17). In spite of all this, Brazilian journalists continue to receive tips and present facts that are not always confirmed something that can be justified by the inexistence of a school of investigative journalism in the country. The Journalists' code of ethics in Brazil was voted at the National Congress of Press Professionals in 1987 to clarify the right to information for citizens and journalists, the roles, rights and duties of journalists, their responsibilities as media professionals, their relationships with other professionals and the consequences of transgressions to this code of ethics. In recent years, several investigative journalism groups as the GD! have been created and in 2017 published twenty-two reports in six months achieving 6.6 million views on Facebook, validating its role as social responsibility.

2.3 Angola

In Angola, the history of journalism may also be divided into three periods. The initial one, considered as the "first steps of journalism" (Lopo, 1964: 39), began in 1845 with the Official Bulletin of Angola. The second, the period of the "free press" (39), is marked in 1866 by "the appearance in Luanda of the weekly The Civilization of Portuguese Africa" (35). The third, designated as the period of "industrial and professional journalism"(39), began in Luanda in 1923 with the newspaper The Province of Angola. In the 60s, the news reports by Júlio de Castro Lopo (1952 and 1964) and José Júlio Gonçalves (1964 and 1972) which were later published in books were considered milestones.

In 2010, in a seminar entitled "Investigative Journalism in the era of the National Reconstruction in Angola" that took place in Luanda and was organized by the Angolan Ministry of Social Communication, several journalists concluded that there was almost no investigative journalism in Angola. There were flaws in "the sources, the newsrooms, the research resources and the lack of time imposed by the newsrooms where journalists work" (ANGOP, 2010). Censorship and the persecution of those who dare investigate controversial stories stillexist, as is the case of Rafael Marques, the journalist imprisoned for his investigation that was the basis for his book Blood Diamonds. In this work, the Angolan journalist exposes not only the corruption schemes of the powerful politicians and police officials in Angola and of the foreign companies and entities with whom they negotiate, but also the deplorable conditions of those populations working in the diamond mining areas. This situation keeps journalists "captive in newsrooms, which hampers research work" (ANGOP, 2010). Responsible investigative journalism "helps moralize societies and promote development in a country such as Angola that has a short history of socio-economic progress" (2010) However, it has strongly conditioned "the freedom and the performance of journalists and journalism in Angola" (SJA, 2013).

Although in Angola, a Training Center for Journalists (Cefojor), a Union of Journalists, a Press Law and a Statute of the Journalist have long existed, the journalistic code of ethics only appeared in 2004. Even so, any investigation that seeks to unravel cases of "promiscuity and corruption" (Marques, 2011: 71), even if in the "legitimate pursuit of the profession", is condemned. This confirms that the pursuit of journalism has no guarantees in Angola. This tendency is aggravated whenever the interests of the political powers are at stake. The cause that originates all types of direct and indirect violence including censorship and self-censorships essentially political. Today, it strongly conditions the freedom and performance of journalists and journalism according to the Angolan Journalists Union (SJA, 2013).

For the SJA (2013), the absence of the Career and Ethics Committee has allowed for chaos. Although The Press Law (no. 7/06, May 15) of the Ministry of Social Communication states that the freedom of the press means 'the right to inform, to seek information and to be informed through the free pursuit of the press activity and business, without constraints or discrimination', in practice this is not the case. The code of ethics of the Angolan journalist (2004) actually refers the fight against censorship. It also states that it is the responsibility of the journalist to 'combat censorship and self-censorship as well as direct or indirect obstruction to the free dissemination of information', and to 'disclose offenses to the right to inform and to be informed and to expose restrictions on access to sources of information and attempts to limit freedom of speech.' In early 2018, due to an article published by the Maka Angola website and the newspaper O Crime, which disclosed the businesses of the former Attorney General, General João Maria de Sousa, journalists Rafael Marques and Mariano Brás went to trial at the Provincial Court of Luanda. Angolan historian and former Minister of Culture, Rosa Cruz e Silva, argues that journalists have to focus on investigation in order to produce cultural content of greater depth and social reach.\(^\text{10}\)

\(^{10}\)http://cdn1.portalanop.co.ao/angola/pt_pt/noticias/lazer-e-cultura/2018/2/11/Historiadora-convida-jornalistas-apostarem-investigacao.2c2d9cfe-a1a7-4cbb-84fe-2c989093c68e.html
3. The Study

A content analysis of six news reports from daily newspapers was carried out. Two from Portugal, Diário de Noticias, two from Brazil, Folha de São Paulo and two from Angola, Jornal de Angola. This analysis also considered the scrutiny of the codes of ethics of each country. The study was further complemented by e-mail and Skype interviews (January / February 2015) to six investigative journalists in order to determine their perception of the presence and relevance of news reports in the media and the compliance of the codes of ethics in their country.

3.1 Profile of reporters and newspapers

For Portugal, Carlos Rodrigues Lima and Valentina Marcelino, reporters and members of the editorial board of Diário de Noticias and José António Cerejo of the newspaper Público. Diário de Noticias (DN), a generalist newspaper based in Lisbon, "stands out as one of the most important titles in the national press" (Global Media Group, 2014). With 150 years of history (founded in 1864), the DN belongs to the Global Media Group which is present in the Media, Radio and Internet sectors. Between January and August 2014, the Portuguese Association for the Control of circulation and editions (APCT) registered an average of 17 thousand copies sold every two months and, according to a study by the Bareme Press in 2014, about 394 thousand readers in its printed format and also in its digital format.

For Brazil, Thiago Herdy, Director of Abrajiai and investigative journalist of the newspaper O Globo, Giovani Grizotti reporter from RBS TV, and Fernando Molica of the newspaper O Dia. Founded in the city of São Paulo in 1921, Folha Group is one of the main media groups in Brazil. The group founded in 1960 the Folha de S. Paulo "the newspaper with the largest circulation and influence" which has been since the 1980s "the best-selling general newspaper in the country among the national daily newspapers of general interest" (Folha, 2014), with an average daily circulation of more than 301 thousand copies.

For Angola, the journalist Rafael Marques was contacted but not able to respond as he was imprisoned in the meantime. The general daily newspaper Jornal de Angola was founded as The Province of Angola in 1923. Following several changes, it adopted in 1975 its current name. Edições Novembro, the company owner and producer since the earliest days of the newspaper, emerged from the Angolan State’s seizure of the Graphic Company of Angola-SARL (Edições Novembro, 2014). Currently, both the printed and the digital version carry the supplements Recreation, Technology and Management, Provinces and Weekend. The printed version registers 50 thousand copies (Jornal de Angola, 2014). This is a state-controlled public communication group in a country where censorship still exists.

3.2 Content Analysis

The content analysis of the six pieces of investigative journalism, demonstrates compliance with certain rules of the codes of ethics of the three countries and confirms their influence and importance in an investigative news article.

Table 1 - Influence of the Codes of Ethics

<table>
<thead>
<tr>
<th>Country</th>
<th>Journalists make an effort to comply with the code of ethics in their reports that reveals a certain influence the code in Portugal.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brazil</td>
<td>Apparently there is compliance with the rules of the code, at least in the written press. However on television, this is not always the case. It may be concluded that compliance with the code depends on the means of communication.</td>
</tr>
<tr>
<td>Angola</td>
<td>Two realities: in State controlled media the code has no influence whatsoever. Independent investigative journalists who respect most of the rules but at the same time do not take great care to follow the rules.</td>
</tr>
</tbody>
</table>

3.2.1 Portugal

With regard to the story Rui Manchete reveals top secret security information, (Diário de Noticias, October 23, 2014) and Police investigate a muzzle of connections among Judicial high officials, (December 11, 2014), by Valentina Marcelino, the two investigative news reports comply with all the rules of the 1993 journalist's code of ethics (Article 6). The journalist, wrote 'according to what Diário de Noticias learned from sources at the highest level, governmental and security forces and services' (DN, 2014), complying with the code that states that 'The journalist must use as a fundamental criterion the identification of the sources'. The journalist did not however sign her name for reasons of professional secrecy. It seems clear that in Portugal, investigative journalists consider the code when carrying out their investigations, which reveals a clear influence of this code and, consequently, the publication of news reports that fulfill their duty - to scrutinize public powers and to obey the ethical principles intrinsic to journalism. Regarding the relevance of this type of journalism, the conclusion is less positive as there is no specific online archive for counting these news reports. The interviewee who stated that there is little investment in investigative journalism by the Portuguese media confirm this.

3.2.2 Brazil

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The analysis of the two news articles Marcelo Coelho’s Question of Order, (Folha de São Paulo)2012 and The Battle of Belo Monte(2013) by Marcelo Leite reveals, in general, compliance with the Brazilian journalists’ code of ethics as the latter investigative journalist ‘exposes facts and information of public interest'. One of the news reports analyzed, a series of reports about the monthly corruption trials in the Supreme Court about the buying of parliamentary votes, was the winner of the 2012 Folha de Jornalismo Grand Prize for its relevance and public interest. Further on, the journalists claimed in the interviewee that this data does not always reflect the reality and depends on the means of communication. On television, for example, journalists often use two strategies, the hidden camera and the non-identification of the journalist, later publishing unauthorized recordings to prove a certain fact. It is possible to say that the influence of the codes of ethics is dependent on the environment where the research is carried out. Its influence is less than that shown in the Portuguese investigative news articles.

3.2.3 Angola
In Angola, since there are two very different scenarios in the country, the State controlled means of communication and the journalists whose reports are carried out on their own behalf in defense of a more liberal and transparent Angolan regime, a news report of each type was analyzed. Daddy’s Girl: How an African ‘Princess’ banked $3 Billion in a country living the $2 a day(2014), by Rafael Marques and American journalist Kerry Dolan of Forbes magazine, is a clear neglect to comply with certain rules of the code of ethics. This is clear in relation to not differentiating between what is news and what is criticism and allegation (despite the presentation of evidence) as ‘the journalist must always ensure that in the public eye, the distinction between what is news (the facts he narrates) and the opinions, interpretations or conjectures’ (Code of Ethics of the Angolan Journalists, CEJA, 2004). The same is true for Article 16 - "the journalist must safeguard the presumption of innocence of the defendants until the final sentence" (CEJA 2004), in the case of Isabel dos Santos, a prominent figure and daughter of the former President of Angola, José Eduardo dos Santos. In a country like Angola this grants her the sort of protection which means the case did not even go to court. Here, the compliance (and therefore the influence) of the code is affected, which does not mean that the evidence presented and the sources cited by the journalists are false.

The newspaper report Crisis in families leads to crimes(Jornal de Angola, 2014) by Vitorino Joaquim apparently fulfills all the CEJA rules selected for this analysis, although this agency has its own ethical conduct (as displayed on the website). An example of this is Article 17, ‘the journalist should not identify, directly or indirectly, victims of sexual crimes and juvenile delinquents, although he may name the gender and age of those involved’ (CEJA 2004), as the journalist refers to those involved as underaged youth or adolescents and indicating only their age. The report may not be entirely considered a piece of investigative journalism, as it does not fulfill the characteristics considered. Because it is a public agency and therefore controlled entirely by the State, there is no full freedom of speech and of the press. That is, the code has no relevance especially asthere are sometimes newspapers articles defending anti-censorship, clearly showing its approval by non-conservative entities.

3.3 Interviews
The interviewees responded to three main open-ended questions: definition of investigative journalism, influence of codes of ethics, and relevance and emphasis given to investigative news articles in the media. All the interviewees mentioned the importance of investigative journalism for more overt and transparent political and public administration systems. They confirmed that investigative journalism is usually initiated by allegations or tips from sources or suspicions of the journalist himself. According to Thiago Herdy, this investigation requires ‘time, money and training’. It must be thorough and ‘bring to light facts that would not otherwise be made known to the public’, thus exposing public authorities, political actors, and anyone who hides wrongful acts. Investigative journalism is the ‘scrutiny of public powers’.

Carlos Rodrigues Lima added that investigative news reports compel the journalist ‘to dedicate more time, to dedicate more knowledge, to look for other sources of information because he needs to investigate, access files and deal with frustration when the allegations lead nowhere’. These claims usually begin ‘with hints, with allegations’, or even from accusations of people involved in these acts (who were later harmed and decided to reveal the truth). However, according to Fernando Molica, with experience investigative journalist also gains perception of what could be a case of injustice or an irregularity that harms people as citizens of a given country. When questioned about the compliance of the codes of ethics by professional journalists, all journalists gave a positive response. However, some ethical questions were raised that may reveal how much or how less these codes influence the decisions of journalists during the investigation processes. The answers differ from country to country as illustrated in Table 2.
In Portugal, the interviewees referred to the code of ethics as a set of rules that good journalists must comply with. Valentina Marcelino stated that investigative journalism must always be 'synonymous of journalism'. The existence of a code governing the profession is therefore an influential factor in the work of an investigative journalist who, while tempted, for example, not to reveal his identification to gain quicker access to documents or unpublished disclosures, must respect all ethical and deontological rules so as to be considered a good professional.

In relation to Brazil, Fernando Molica stated that most journalists disregard or ignore the existence of a general code of the profession. They choose to respect what he called 'citizen's ethics', the rules of 'common sense' or even the codes of the different media, not allowing themselves to be influenced by them when, for reasons of public interest, they decide to resort to means that are often considered wrong. There is an ethical question regarding the use of the hidden camera and the disclosure of the journalist’s identity that has caused a lot of discussion, especially regarding television. Ethically condemned by many, defended by others for its importance in disclosing the truth, the hidden camera has been debated among journalists and entities responsible for complying with existing codes of ethics and laws.

According to the Brazilian Journalists' Code of Ethics, since 1987, the journalist should not publish information 'that has been unduly obtained, for example, through the use of false identities, hidden cameras or microphones, except in cases of undeniable public interest and when all other possibilities have been cleared'. The Brazilian journalists interviewed defended this exception. Giovanni Grizotti stated that when he resorts to these means, he does not feel that he is transgressing ethics, since he does so 'in the name of public interest, precisely in order to prevent an enormous number of people from falling at the mercy of gangsters (...) of corrupt politicians'. According to Fernando Molica, when it comes to 'serious information, something that affects life or public money' and there is no other way, it is justifiable, but it must not be trivialized. The decision must always be 'much talked about, (...) much discussed within the newsroom', and its necessity well justified. The influence of the code of ethics on the work of investigative journalists in Brazil is less than in Portugal, since the rules are often violated.

As far as the Angolan case is concerned, the dataless specific. As it was not possible to interview the Angolan journalist Rafael Marques, the Portuguese journalist Carlos Rodrigues Lima, who knows his work well, was questioned about the Angolan reality and this raised another ethical issue. In his opinion, Rafael Marques 'has good sources in Angola and he investigates', but he is 'both a journalist and an activist, and [...] things get a little complicated from the point of view of the analysis of the news reports he publishes'. The Code of Ethics of the Angolan journalist (2004), safeguards that 'the journalist must maintain an independent and critical attitude towards all established powers and interests, but never in a prejudiced, resentful or hostile manner' and being an activist he may infringe the code. On the other hand, the code in Angola is very badly or hardly known at all. Journalists who reveal information about certain illicit actions of politicians and other figures who hold public power are persecuted. The influence of the code is less than in Portugal or Brazil, because even though it contains several points that safeguard the protection of journalists, the freedom of the press and the duty of these professionals to reveal obstructions to this right, the security of investigative journalists is dubious. An example of this is Rafael Marques, arrested and persecuted for exposing, with evidence, an illegal situation that jeopardized Angolan citizens.

In Portugal, as José António Cerejo pointed out, there is investigative journalism, 'but very little, in relation to what would be necessary, for example, to pay attention to the responsibilities of journalists in a country with a great lack of transparency in the management of institutions and with high levels of corruption.' However, the factors that justify this scenario are often external to the journalist.
The reasons are less related to 'the actual importance and public interest of the news reports and more connected to the impact on sales and reading of electronic editions', which are also the reasons that have been destroying printed journalism in Portugal and, to a lesser extent, a little throughout the world. Carlos Rodrigues Lima and Valentina Marcelino were also positive about the presence and importance of investigative journalism in the Portuguese media, especially when it comes to 'a good piece of investigative journalism'. This is something that 'is not on the agenda, is against the tide, is not expected is and is thoroughly worked', but ends up having a significant impact on the public for 'honoring the newspaper, the journalist and journalism'. There is, however, the question of human capital within the element it do not practice real investigative journalism. For weekly newspapers, the future is brighter 'because if you invest in investigative journalism, people like it.' In the daily newspapers, there is the printed version and the website that have to be fed every day. Being a few, often one or two journalists per section, there is enough time for the 'day-to-day management', but not enough to investigate some cases in-depth, 'when the journalist may by his own means, information and work, develop' that story.

There is still a mentality in Portugal in relation to journalists’ easy access to documents: 'Although access to documents is often public and natural, when the journalist asks for it, there is always some wait, a form to be filled, a requested clearance ... '. Carlos Rodrigues Lima even stated that there is no 'culture of open access to everything', which harms and delays the work of investigative journalists who end up having to put aside the idea of reporting and investigating due to today's immediacy.

In Brazil, investigative journalism is of paramount importance. There are several well-known journalists working in this area and in the different media in order to assure a full democracy. According to Giovani Grizotti 'had it not been for an investigative, critical, and political journalism in Brazil, perhaps the country would have been transformed into a Venezuela, where the media is controlled, where justice is subjugated to power, where Parliament is completely submissive to Government'. Although there have been attempts on democracy, the media has invested heavily in investigative journalism and has succeeded in preventing their success. A lot of investment is needed to do this type of journalism in the best conditions. It is therefore difficult to find a media group that is willing to pay for investigative journalism and, in addition, to let the reporter work exclusively on his investigations without having to 'cover the facts of everyday life'. In Thiago Herdy's opinion, to add to this, there is the problem of the workforce as 'the teams in newspapers, radios and TV's are getting smaller and smaller'. There has been, in fact, some investment as great efforts are being made to ensure that the media do not become extinct by the circumstances that currently affect journalism and that are highly valued by the public as the Internet and the new technologies. Still, it is necessary to invest more and, according to Fernando Molica, 'if you want journalism in general to survive you have to make less mistakes and write better, and produce more relevant information for society'. Another problem that may undermine the importance given to investigative journalism lies in the security of the journalist himself. Much worse than what happens in Portugal where there are persecutions, threats, assaults, in Brazil, several journalists are murdered because of their investigations. For Giovani Grizotti, some journalists refuse to reveal their identification.

Angola has been at war for years. The Portuguese journalist Carlos Rodrigues Lima, believes most of the leaders are still living in a 'psychological warcontext', censoring anything that compromises their power or exposes their corrupt actions. Since this is the purpose of investigative journalism, it is assumed that its relevance in the country is little or none. Even so, journalists have joined efforts to clarify and expose the illegal acts of their rulers and other powerful personalities through their investigative news reports, even if they are later persecuted and arrested. This was the case of Rafael Marques when he published his book exposing compromising information and documents.

**Final Considerations**

The prominence given to investigative journalism differs from country to country. In Portugal, there has been a decreasing trend of this type of journalism in the national media. The declining number of journalists who are willing to do this job alone and the difficult situation of journalism in general accounts for this decrease. The lack of time and investment has made this type of journalism less feasible in a country where corruption is more visible and systematically exposed. Some Portuguese journalists, however, referred that finding sources and evidence is made difficult by the administrative and judicial mechanisms themselves. The influence of the code of ethics in Portugal is still quite significant. The 'good journalists', according to Carlos Rodrigues Lima, strive to enforce it, and those who do not implement it do not practice real investigative journalism. In Brazil, the importance attributed to this type of journalism is considerable. Although investment has declined, in all of the Brazilian media there are dozens of journalists working exclusively in this area. Being a country with a profound history of corrupt activities by politicians, companies and organizations, the investigative reports have helped in the conservation of a cleaner and fairer democracy for the citizens.
Giovani Grizotti confirmed this by stating that ‘thanks to the accusations and criticism made by the press and the television reports, Brazil today is a country that lives its full democracy.’ Even so, this study has revealed that the influence of the code of ethics is less than in Portugal since the rules are often violated. Many journalists are unaware of the rules, choosing to act according to their own values. Others resort to means considered often unethical, but safeguarding that these tips or allegations are in the public’s interest and always seeking to confirm and verify them. This is justified by the inexistence of a school of investigative journalism in the country.

It has been shown that the relevance of investigative journalism in Angola is hardly any or none confirming the information officially provided ‘there is practically no investigative journalism’ (ANGOP, 2010). Several journalists working independently have created new means of communication and carried out investigations in order to expose the illegal acts of their rulers and of other individuals in power. The existing flawshave to do ‘with the sources, the newsrooms, the means to investigate’, or the censorship and persecution of those who display an anti-corruption position. Politics has strongly conditioned ‘the freedom and the performance of journalists and journalism in Angola’ (SJA, 2013). This is also the reason why the influence of the code of ethics in this country is inexisten. On one side, the media and the journalists assume the responsibility of informing and fighting censorship but on the other, public entities are subject to the orders and control of the government. In a country where the freedom of speech and of the press are still controlled, journalists carry out their jobs in an environment where they have no legitimate rights or guarantees. It seems fair to conclude that the relevance of investigative journalism differs in Portugal, Brazil and Angola as does compliance with the national codes of ethics. It has also been shown that this is due to the political background of each country, the existence of an overt or covert censorship, the different working environments of the journalists and their degree of security.

References

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