

**DISCLOSURE AND ORGANIZATIONAL TRANSPARENCY:  
A MODEL FOR COMMUNICATION MANAGEMENT**

**Craig DuHamel MSc.**

**PhD Thesis**

**Department of Film, Media & Journalism**

**University of Stirling**

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**Declaration:**

**This thesis has been composed by Craig DuHamel. The work the thesis embodies has been done by Craig DuHamel and has not been included in another thesis.**

A handwritten signature in black ink that reads "Craig DuHamel". The signature is written in a cursive style with a large initial 'C' and 'D'.

**Craig DuHamel**

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## **ABSTRACT**

This thesis examines the optimal role for public relations practitioners to play in managing the communications of disclosure situations. The contribution to knowledge in this work is the clarification of decision-making around organizational disclosures and the role public relations practitioners play in these sometimes difficult and sensitive situations. Decision making around the disclosure of organizational information has not been given much attention in the public relations and communications management literature. While other fields such as medicine and finance have researched the merits of disclosure and transparency for a number of years, the topic has evaded in depth academic examination in communications literature. Given the involvement of public relations practitioners in organizational disclosures, it is somewhat surprising that a model for managing the communications of these situations has not been proposed previously in published research. This thesis closes this gap by proposing a normative, theoretical model that is grounded in practice, and uses ethical decision-making, to assist communicators in developing strategies for managing disclosure events and improving the transparency of their organizations to the public.

Using the Strauss and Corbin (1998) approach to Grounded Theory, this thesis explored the topic of disclosure with senior level Canadian public relations practitioners to elicit key themes prior to the development of an initial model which was then tested through further empirical research and user-group contact. The model presented in this thesis is intended to help public relations practitioners and their organizations' senior management teams, structure their thoughts about disclosing information and develop a communication strategy through a step-wise process that works to find a balance between the needs of the organization and the information needs of stakeholders to make an informed decision about the situation.

This thesis provides unique insights into practitioner dilemmas and challenges; highlights a number of important themes and conceptual issues that have not received attention to date; and offers a model for practice.

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## CHAPTER SUMMARIES TABLE

Chapter	Summary
<b>I. Introduction</b>	The aim and four research questions of the thesis and the theoretical influences are presented in this chapter in addition to the methodology used to develop the disclosure model. The introduction addresses the necessity of conducting this research and proposes the gap in public relations literature that this thesis fills.
<b>II. Literature Review</b>	In this chapter, disclosure is defined and the published research in communications, healthcare and business on this topic is explored. By exposing a gap in public relations literature, this chapter justifies the necessity for a disclosure model that public relations practitioners can use in their practise.
<b>III. Methodology</b>	The main research questions to be answered in this thesis are presented and the design and method of gathering and sorting data are addressed. The use of grounded theory is presented and a discussion of why this approach is most appropriate for the development of a model is mentioned. The justification of the sample used for this study is discussed and the limitations of the thesis are addressed.
<b>IV. Interview Data Analysis: Development of Concepts and Categories</b>	Empirical data gathered through the 22 interviews and focus groups are presented in the categories that emerged through the iterative use of grounded theory. The data presented here related to the development of the model which is first presented in Chapter VI and subsequently tested in Chapter VII.
<b>V. Towards a Disclosure Model</b>	This is a transitional chapter which acts as a bridge between the raw data presented in Chapter IV and the highly descriptive approach to explain the model in Chapter VI. In this chapter the theoretical influences on the model are discussed in more detail than they have been in other chapters.
<b>VI. An Initial Proposed Model for Communicating Disclosure</b>	In this chapter, the data and theory previously discussed culminate in the presentation of an empirical disclosure model. This is a 'step-wise' discussion of how the model works and how it was developed including references to the data and previously discussed theory.
<b>VII. Validation</b>	In this chapter, the model developed based on data from the 22 interviews is tested in a series of focus groups. The focus groups offered further suggestions on the model and provided validation for the data gathered in the interviews,
<b>VIII. Conclusion</b>	Answering the four research questions and a discussion of the implication of the thesis on practice and PR knowledge is the main purpose of this chapter. In addition, this chapter also suggests some further opportunities for research such as the quantitative testing of the model in other settings.
<b>IX. References</b>	Full list of references used in the thesis
<b>X. Appendices</b>	Appendix A: List of interview participants, invite letter, and discussion guide Appendix B: Fictional Vignettes use in the interviews Appendix C: Codes of Ethics from CPRS, IABC, and PRSA Appendix D: Focus Group Materials – invite letter, questionnaire, discussion guide, and bios of Focus Group D participants

## I. INTRODUCTION

The contribution to knowledge offered in this thesis is the clarification of decision-making around organizational disclosures and the role public relations practitioners play in these sometimes difficult and sensitive situations. By drawing on theory in communications, healthcare, business and management, and empirical data from public relations practitioners, this thesis used grounded theory to develop an original model, practitioners and their organizations may be able to use when they are confronted with difficult decision-making concerning the disclosure of information.

In addition to presenting a proposed model for disclosure, this thesis has attempted to answer four research questions:

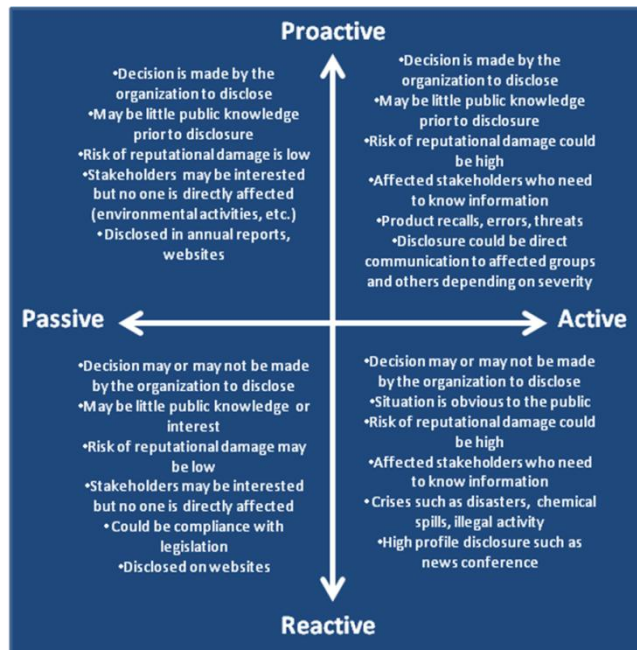
1. What types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?
2. How does the organization's culture affect both its willingness to communicate and use of specific methods or strategies to disclose information publicly?
3. What is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?
4. When involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?

To answer these exploratory research questions and to build the model a qualitative approach was taken. The adoption of grounded theory required iterative testing and adaptation of the model. The work was inductive in nature and involved gathering empirical data from practitioners through interviews and focus groups. This approach allowed me to probe various ideas as they emerged in

conversation with participants. Qualitative research derived a wide-range of categories pertaining to the field of disclosure as they arose in the data collection process.

This thesis provides rich evidence and multiple insights concerning disclosure and develops a model for application to practice. The model presented in this work builds on previous public relations planning frameworks such as RACE (Marston, 1963), RAISE (Kendall, 1992), and ROPE (Hendrix, 1995) to include insight into the ethical decision making that occurs and strategy development that takes place specific to disclosures (these planning frameworks are discussed in more detail in Chapter VI where the model is first presented). Quotes from participants in this research have been provided throughout the forthcoming chapters to offer direct evidence of how the model was developed and how the research questions were answered. These data offered excellent insight into how practitioners make recommendations about disclosure communication strategies and the sometimes difficult and ethical dilemmas they encounter in these situations.

Disclosure is a fairly broad topic and may cover a number of issues for organizations such as regulatory requirements to provide information to government, 'social disclosures' that offer detail of a company's environmental programs for example, and providing people with information about risk an organization may have created such as a product recall. The definition of disclosure is examined more thoroughly in the Literature Review (Chapter II, Section, 2.0, pp. 20-25) but for purposes of introducing the topic, the diagram provides a map of sorts to define the situations where the model developed through this thesis may be most relevant.



At the tips of the north/south line of the diagram are the words 'proactive' and 'reactive' and at the east/west points of the line are the words 'active' and 'passive'. The vertical line refers to how the organization responds to the situation, either in a manner that has the organization providing the information to its audiences before it becomes public (proactive) or having to comment on a situation that may have already been made public or is about to become public (reactive). A theme emerged among the participants in the fieldwork for this thesis that suggested they would prefer to communicate in a proactive manner to 'get ahead of the story' (see Chapter IV, p. 134). On the horizontal line, the organization may be 'passive' in its disclosure by not engaging directly with audiences by posting the information on its website or mentioning something in its annual report or it may be 'active' with its disclosure and have direct contact with stakeholders about the issue.

Disclosures may occur in any of the four quadrants. Those in the northeast that are communicated in a proactive manner (the organization releases the information before anyone else) and is active with its publics by perhaps engaging in a dialogue with those who are affected directly, may include issues such as errors that the public may need to be informed about to make a decision about how to respond. In these situations, the organization makes a decision to provide the information to at least those who are affected directly with the situation. In the southeast, 'active/reactive' quadrant, the organization may be compelled to disclose information about a situation that could be obviously public such as a chemical spill. In this area, crisis communications may be the most applicable approach for the situation. In the southwest, 'passive/reactive' quadrant, the organization may be disclosing information that it has been told to do so perhaps through legislation but it may not be required to engage directly with stakeholders as a result. In the northwest, passive/proactive area, disclosures of this nature occur as the result of an organizational decision to offer the information and it is provided in advance of anyone else disclosing it but there may not be a specific need to engage directly with stakeholders with the information. In the Literature Review (Chapter II, p. 20) Anderson and Frankle (1980, p. 467) described these types of disclosures as 'social disclosures' that include the communication and reporting of information regarding an organization's community involvement, human resources, environmental impact and product service contributions.

In this thesis, the model developed may have most relevance to those disclosures that occur in the northeast or 'proactive/active' area where the organization has to make a decision about whether or not to provide the information and a communication plan likely has to be developed to help manage the release of information publicly.

On a personal level, this thesis has been an incredible opportunity to explore many of the questions about disclosure that have kept me awake at night over the years in my practice as a public relations advisor to several different organizations in government, mining, finance, and healthcare. By developing a disclosure model through this thesis, my intention was to create something that is based in empirical evidence which would remove much of the 'guess work' out of developing solutions for such difficult situations. As will be demonstrated in later chapters (see Chapter IV, pp. 126 and Chapter V, pp. 198-200) the use of intuition to arrive at recommendations for managing the communication of disclosure situations was a theme in the data but this thesis is an attempt to fill a gap in the communications literature by proposing an empirical model that is based on the evidence provided by communicators in the field.

As will be demonstrated in the Literature Review (Chapter II, pp. 22-41), despite disclosures having a need for skillful communications, to ensure the organization maintains its reputation, relationships with stakeholders, and ability to conduct business, there is little research in the public relations literature examining the issue of how to manage these situations. Many of the articles on the topic of disclosure are found in the realm of crisis communications and do not include much direction on ethical decision making or involvement of stakeholders in the disclosure strategy (see for example Hearit 2001, Lordan 2005, Samansky 2002, and Schoenberg 2005). The bulk of public relations research into crises offers important commentary on what to do when a crisis occurs, meaning the situation is either already in the public domain or is imminent and measures are taken to put forth the company's position on the situation. The omission in the public relations literature however, is the



lack of attention paid to situations where an ethical decision has to be made by the organization about whether or not information should be disclosed.

There is a fair bit of research on disclosure in other fields such as medicine (Abadia-Barrero & Larusso 2006, Bolsin 2003, and Fallowfield, Jenkins & Beveridge 2002, Liebman & Hyman, 2004, Darr 2001 and Hebert, Levin & Robertson 2001) and business ethics including finance and accounting (Anderson & Frankle, 1980, Lev, 1992, and Roberts, 1992) and they will be drawn upon in this thesis to help build a model. In addition, an examination of the literature on the types of organizational cultures and climates that may facilitate disclosures is covered. The thesis explored how organizations disclose information and how publics and stakeholders are defined and reached by various communication methods during disclosure situations. Finally, the public relations literature in Chapter II (pp. 84-90) is examined to determine the optimal role for PR practitioners to play in making decisions and providing advice to organizations about disclosing information.

An integral part of developing the model was to gather data from practitioners on the role they believed they should play in communicating organizational disclosures. To gather empirical data for the first part of the study, a total of 22 senior communicators from across Canada were interviewed to determine the concepts and categories that were used to build the first iteration of the model (see Appendix A for a list of 22 interviewees). Practitioners operating at the senior levels of their organizations were targeted due to their knowledge of the strategic communications advice provided in these situations, which helped develop a broad-base of categories in the early stages of this research. Through the process in grounded theory known as 'theoretical sampling', new participants were asked to provide their input into the study until the subject area and relevant categories were saturated with a substantive amount of data to form the initial model. Once the first version of the model was developed, efforts were made to test it further through a website and a series of four focus groups. The results of these groups are discussed in Chapter VII.

Finally, the end product of this thesis is a model based on the feedback of the interviewees and relevant theory. The model will require additional testing to determine its effectiveness but it is a starting point that could be relevant to future academic work.

The thesis structure is as follows: will first examine the existing literature in communication, healthcare and business and finance, for examples of disclosure models and approaches to communicating sensitive organizational information (Chapter II). An explanation of the methodology used to develop the model and answer the research questions is provided (Chapter III) and then the empirical evidence gathered through interviews and focus groups is shared (Chapter IV). The theoretical underpinnings of the model such as ethical decision making and the use of moral frameworks and power relationships are explored in Chapter V. The initial version of the model which is based on the interview data is presented in Chapter VI and the modifications of the model from further testing are provided in Chapter VII. Finally, in the Conclusion (Chapter VIII), the thesis questions are examined and insight is offered into the implications of the thesis and future opportunities for research are suggested.

## II. LITERATURE REVIEW

### 1.0 INTRODUCTION

One of the most revealing findings of this literature review was the lack of attention public relations scholars have paid to the process of how to disclose sensitive information that could be damaging to an organization's reputation, its relationship with stakeholders, and its ability to achieve its mission and strategic goals. There is an abundance of articles in public relations literature dedicated to crisis communications and *apologia* strategies but they tend to focus more on the examination of case histories or planning for large scale disasters (see Hearit 2001, Samansky 2002, Lordan 2005, and Schoenberg 2005). Communications literature does not focus a great deal of attention on how public relations practitioners can manage the release of information that companies should disclose such as health hazards associated with the use of their products. There is little public relations academic work focused on understanding the decision-making that takes place in organizational disclosures. As a result, this literature review has widened its scope to look outside of public relations to find academic work on disclosure in fields that have had more experience in this topic such as finance and accounting (see Anderson & Frankle 1980, Holland 2005, Gibbons, Richardson & Waterhouse 1990, Lev 1992, and Roberts 1992) and healthcare (see Abadia-Barrero & Larusso 2006, Bolsin 2003, Darr 2001, and Fallowfield, Jenkins & Beveridge 2002, and Liebman & Hyman 2004).

In reviewing a broad spectrum of academic literature on how information is disclosed from an organization to its publics, studies examined practical strategies and tactics and explored theories of how, when and to whom communication should take place to address a corporate issue that has public consequence (see Arpan & Roskos-Ewoldsen 2005, Campbell & Beck 2004, Kaufman, Kesner & Hazen 1994). Despite these research efforts, there appears to be a lack of a comprehensive model or 'how to' guide that communicators can reference when presented with a potential disclosure issue. Given the potential serious consequences to an organization's reputation and the impact on its stakeholders if information is not disclosed effectively, there is a need to

develop a model to help public relations practitioners provide advice in these situations where there is a public need to provide people with details of a disclosure situation.

This literature review lays the theoretical groundwork for the creation of a disclosure model. This chapter is structured to examine the existing research in disclosures which highlights where gaps exist to offer further insight into the process of organizational disclosure. The most logical starting point for this review is settling on a common definition of organizational disclosure. To do this, literature from accounting, management and business ethics has been reviewed. The definition begins with Anderson and Frankle (1980) and the term 'social disclosure' and continues with Ullman (1985) and the use of the phrase 'social performance', to Roberts' (1992) work that included the idea of organizations having 'social responsibility' to disclose information.

## **2.0 DEFINING DISCLOSURE**

There are a number of different terms in academic literature that define the act of an organization 'disclosing' information to its stakeholders or publics. Authors in fields such as management, business ethics and accounting (Anderson & Frankle 1980, Ullman 1985, and Roberts 1992) use terms such as 'social disclosure' or reporting on 'social performance' or 'social responsibility' to describe the act of communicating information that could for example be damaging to a company's reputation such as providing the public with details about labour policies in developing nations. For the purposes of this thesis, 'disclosure' will refer to the information an organization chooses to communicate to stakeholders. The decision to provide this information is made through an ethical process that considers the needs of stakeholders for information and possibly the desire to engage in dialogue with the organization and potentially resolve problems.

The term 'disclosure' refers to organizational communication that is performed to allow stakeholders to make an informed decision about a situation that involves the organization. These disclosures are similar to what L'Etang (1995 p. 128) described as the 'direct responsibilities' organizations owe to

their stakeholders. She contended that organizations have a moral obligation to be open and transparent to their consumers and other stakeholders to ensure people can make informed decisions about using the products and services a company provides (L'Etang, 1995 p. 128). In this sense, organizations should disclose information that they are not only legally required to communicate but they should also consider a method for providing information based on their 'obligation' to inform the public with details about their operations that could impact people's lives.

Similar to the definition of disclosure above, Coombs and Holladay (2009) defined the concept of 'transparency' which is highly relevant to this thesis. They suggested that transparency can be defined simply as the opposite of secrecy (Coombs & Holladay, 2009, p. 6). They argued that organizations should seek to disclose rather than to conceal information but the problem is that what should be disclosed is easier to identify in the financial and political arenas where certain types of information reporting is mandated but is far less clear for social issues (Coombs & Holladay, 2009, p. 6). This thesis explores these issues through the eyes and experiences of senior public relations practitioners to understand how they, and leaders in their organizations, make difficult decisions about disclosing issues that are not mandated or required through legislation but may have an impact on society.

In the context of this research, the word 'disclosure' has drawn upon elements of corporate social responsibility, social disclosure social performance and transparency. There appears to be more similarities than differences among these terms. For example, Anderson and Frankle (1980, p. 467) explained social disclosure as the communication and reporting of information regarding an organization's community involvement, human resources, environmental impact and product or service. In addition to contributing to an organization's community, Ullman (1985, p. 543) suggested social performance refers to the extent to which an organization meets the needs, expectations, and demands of certain external constituencies beyond those directly linked to the company's products and markets. Ullman's (1985) definition alluded to the selfless nature of social performance by mentioning how well an organization meets the needs of its environment beyond the interests of its

own products and markets. Roberts (1992, p. 595) described social responsibility as activities, policies or actions which identify a company as being concerned with society related issues. In essence, all of the above terms describe the need for an organization to meet the public's desire to be informed about what an organization is doing beyond the company's core business. Making decisions about disclosing organizational activities that are 'beyond the company's core business' and may cause the organization reputational damage is a key component of what the model proposed in this thesis has attempted to help communicators do.

In situations where organizations have shareholders or may be funded by public dollars there are likely regulatory or legal requirements to disclose information. These disclosures could include providing earnings reports to shareholders or financial statements of government departments to the public. These disclosures may be routine for an organization and not require too much decision-making. The model developed in this thesis is an attempt to help make decisions around disclosures that may not be as 'easy-to-do' as providing the public with financial statements (although these may also cause controversy). To further clarify the difference between divulging information voluntarily versus complying with the law, Lajili and Zeghal (2005, p. 138) defined two types of organizational disclosures in terms of managing risk. They suggested if a risk involves a mandatory disclosure then the organization is adhering to a regulatory requirement such as principles of accounting or obligations for a security exchange. If a risk involves management discretion as to the materiality and significance of the information then it is considered a voluntary disclosure (Lajili and Zeghal, 2005, p. 138). An interesting component of the authors' description of voluntary disclosure is the concept of management discretion. Later in this chapter, the notion of management judgment as well as the role of an organization's culture in determining how, when and what information is disclosed are examined in more detail. For the purposes of building the definition, the important point to make is that there may be some level of subjectivity to disclosure, which can be dependent on a number of variables including the approach management takes to addressing these issues.

Outside of the literature in communications and business, a significant amount of work has been done in the area of disclosure in healthcare as it pertains to the disclosure of errors and adverse events. Researchers in this area have described a serious event or a situation that needs to be disclosed as, “... *an occurrence or situation involving the clinical care of a patient in a medical facility that results in death or compromises patient safety and results in an unanticipated injury requiring the delivery of additional health services to the patient.*” (Liebman & Hyman, 2004, p. 22) A definition of disclosure that seems to be consistent with what other authors in this area have described is provided by Lamb, Studdert, Bohmer, Berwick, and Troyen (2003, p. 73). These researchers described disclosure as telling patients or their families about unexpected harm that occurs as a result of care, not directly related to a patient’s illness or condition (Lamb, Studdert, Bohmer, Berwick, & Troyen, 2003, p. 73). Similar to the definitions of what organizations consider social disclosures, this definition provides information to a public (the patient or the patient’s family) that is not related to the patient’s illness. Since there is a sufficient amount of research in the area of patient safety that deals with disclosures, this thesis has drawn upon this knowledge to build a model.

At this point, it might be helpful to discuss what does not qualify as a disclosure decision for the model proposed in this thesis. For example, in the marketing and finance literature the term ‘preannouncement’ describes, “... *any action by a firm that provides a direct or indirect indication of its intentions, motives, goals or internal situation*” (Calantone & Schatzel, 2000, p. 17).

Preannouncements differ from other signal types in that they are an organization’s deliberate communications regarding its future planned action, which include news releases, web casting, speeches, interviews, and others (ibid). The distinction here is that although a preannouncement is a public disclosure that could include for example an organization’s quarterly earnings, this information is provided for the purpose of advancing business objectives such as gaining market share. The model developed in this thesis attempts to help organizations and communicators make decisions about providing information that may benefit stakeholders and potentially present the organization as being upfront and honest with the public.

Another important area of distinction worth making is the relationship between crises and disclosures. Some disclosures may result in crises but not all disclosures become full blown crises. Seeger, Sellnow and Ulmer (1998) defined a crisis as, "*A specific, unexpected and non-routine event or series of events that create high levels of uncertainty and threaten or are perceived to threaten an organization's high priority goals*" (p. 233). Pearson and Clair (1998) defined a crisis as, "*...a low probability, high impact situation that is perceived by critical stakeholders to threaten the viability of the organization and that is subjectively experienced by these individuals as personally and socially threatening*" (p. 66). Common to these definitions of crises is the element of surprise and the notion that these events are of low probability. While a disaster such as a fire or an unanticipated event like product tampering are crises and will most likely involve some form of disclosure from an organization, not all disclosures are crises that have an immediate action and in some cases, providing information may take place years after the incident. For example, more than 50-years after the transgressions occurred, Deutsche Bank revealed that some of its gold reserves could have been gained through Nazi looting during the National Socialist period in Germany (Campbell & Beck, 2004, p. 107).

Rather than addressing disasters and other forms of crises that have an immediate and obvious impact on an organization, disclosures seem to be more related to the management of issues. Heugens, Van Riel, and Van Den Bosch (2004, p. 1350) suggested there is a difference between crises and issues and they explained this through the concept of 'reputational threats' that are events or trends which could have a negative impact on an organization's relative status amongst its peers as perceived by its stakeholders, if left unattended. According to the authors, these threats usually come in two forms, crises or issues. Crises are more immediate than issues which are typically slowly evolving, relatively predictable and often highly politicized (ibid). Crises represent shocks or jolts that open up the organization to the possibility of change, whereas less immediate issues allow organizations to engage in a learning process (ibid). Disclosures may involve the immediacy of a crisis or they may have a longer lifespan before being communicated publicly such as an issue. As is



evidenced in Chapter VI, where the model is presented, the schematic borrows elements of both crisis communication and issue management.

For the remainder of this thesis, 'disclosure' will be used to describe the information that organizations make a decision to communicate publicly. These disclosures are not necessarily required by law or other regulation and they may pose a reputational risk to the organization. The motivation to communicate this information is to provide the public or a specific stakeholder group with details of a situation that is of direct benefit to the audience and could contribute to the common good of society.

### **3.0 EXPLORING ORGANIZATIONAL RESPONSIBILITY TO DISCLOSE INFORMATION**

In this section, the literature is reviewed to first, gain a better understanding of why organizations provide information publicly and what motivation exists behind these actions, and second, what disclosure communication organizations provide to their audiences, if any, and finally what differences exist among the various industry sectors with respect to the type of information that is offered to publics.

#### **3.1 Why Do Organizations Disclose Information?**

There seemed to be two general motives described in the literature for organizations to disclose information to the public, which are not necessarily mutually exclusive. The first is to ensure the organization is perceived publicly as a good corporate citizen and the second involved meeting a strategic business need of the company. For example, a financial institution provides information on its website about its many environmental and greening initiatives. This may not be linked directly to the business goals of a bank whereas an oil company that chooses to disclose its environmental track record, may be doing so to demonstrate its social conscience but also the organization may be keen to communicate this information to avoid public and political pressure. What appears to be missing from the literature is the idea of using disclosures to benefit the information needs of a

stakeholder group or the public in general. The motivations for disclosure presented in the literature seem to be more about the needs of the organization to position itself in a positive light and less about the need to create dialogue or provide information for the public.

To examine the idea of creating a dialogue or symmetry between an organization and its publics, Heath (2001, pp. 34-35) suggested a concept called rhetorical enactment theory. This concept recognizes that symmetry between organization and stakeholders is ultimately a matter of strength of each idea contested in public. A rhetorical enactment view of public relations acknowledges that everything each organization, market, audience, and public, does and says becomes meaningful because of interpretations that people place on those actions and statements. A rhetorical view of disclosures would include thoughtful dialogue between an organization and its stakeholders, rather than the simple transfer of information from one to the other (Heath, 2001, p. 32). In terms of disclosure, the motivation for a company to provide information to its publics could be to create symmetrical relationships with stakeholders to enable the organization to achieve its objectives while recognizing the information sharing needs of its audiences. Heath (2001) cautioned however that rhetoric cannot sustain itself with 'hollow words' spoken or written by persons who have no commitment to truth and no desire to help key publics make informed and ethical decisions. Organizations that attempt to use rhetoric to control and manipulate the opinions of stakeholders, risk public exposure of their tactics as well as the flaws in the content they espouse (Heath, 2001, p. 32). Essentially, according to rhetorical enactment theory, disclosures may be used to start dialogues between stakeholders and organizations but the conversation has to be free of manipulation from any party in order to create a legitimate and meaningful dialogue.

Brammer and Pavelin (2004, p. 86) suggested disclosures are a significant tool in the management of relationships between the company and its stakeholder groups. The authors claim social disclosures can be pre-emptive steps to mitigate adverse regulatory or legislative pressures (ibid). Consistent with the Grunig and Hunt (1984) concept of symmetrical public relations, Brammer and Pavelin (2004, p. 87) suggested that corporate disclosures are attempts to remove informational

asymmetries between the organization and its external agents. This may address the motive for why organizations provide information without specific business objectives in mind but it is not clear from their work why organizations would provide information to create symmetrical relationships.

An important criticism of the linkage Brammer and Pavelin (2004) made with the Grunig and Hunt (1984) concept of the two-way symmetrical model of public relations should be noted at this point. Jahansoozi (2006, p. 65) was critical of the Grunig and Hunt's symmetrical model for its focus on publics that are active and targeting the organization. The preoccupation with active publics is understandable when the public relations function is responding to crises, but in improving organizational transparency for example, it may be important to evaluate relations with non-active publics as well (Jahansoozi, 2006, p. 65) and this may be missed in a disclosure if the Brammer and Pavelin (2004) approach used the Grunig and Hunt (1984) theory as its basis.

Brammer and Pavelin (2004) found that an organization's disclosure strategy is related to the public sensitivity or awareness of the organization's activities, and that the provision of information to the public is correlated positively to its size, media visibility and social performance (Brammer & Pavelin, 2004, pp. 95-96). According to their work, large companies operating in areas that have resonance with the public such as pharmaceuticals and oil and gas are motivated to disclose information to maintain their public reputations. Unfortunately, the study only examined large, publicly listed companies in the United Kingdom and the data were found in two indices (Business in the Environment and Business in the Community) and the organizations' annual reports. There was no primary research conducted with the organizations so it is difficult to determine the underlying motivations for the disclosures and whether or not they were effective in creating a dialogue. Passive disclosures in annual reports do not necessarily help to create dialogue with stakeholders. It may have been worthwhile to examine smaller organizations as well to see how their disclosure practices may differ from those of larger company's and to look at what might drive information sharing with publics in companies that find themselves out of the public spotlight.

In a similar study, Clarke and Gibson-Sweet (1999) attempted to provide more information about how corporate social disclosures are used as a legitimacy tool by reviewing reporting of the top 100 United Kingdom companies in two areas: community involvement and environmental issues (Clarke & Gibson-Sweet, 1999, p. 7). They reviewed annual reports and community affairs reports to determine the level of disclosure of environmental issues among these 100 companies. The authors suggested that self-reporting of community involvement in companies with high public profiles helped to build goodwill in the community and it increased brand recognition (Clarke & Gibson-Sweet, 1999, p. 8). They also mentioned that social responsibility disclosures may have a positive effect on market performance and the management of organizational legitimacy, which they defined as a social contract between business and society that represents recognition of the company's moral accountability (Clarke & Gibson-Sweet, 1999, p. 5). Consistent with this approach is a concept that Tombs and Smith (1995) examined that looked at the democratization of organizations through corporate social responsibility. They suggested that the key in the development of an organization that wants to become more democratic through social responsibility must be the availability and accessibility of information and it is only a corporation which is striving towards a democratic form of corporate social responsibility that is likely to make such information available (Tombs & Smith, 1995, p.144). They wrote that a more democratic form of corporation, one which is recognized as striving towards real corporate responsibility, is likely to experience much less of a crisis of legitimacy than those corporations which are closed to potential critics and stakeholder groups (Tombs & Smith, 1995, p. 145). This is an interesting concept but what is lacking in their paper is how organizations can share information effectively and determine what information to disclose. A disclosure model may fill this gap.

Brammer and Pavelin (2004) and Clarke and Gibson-Sweet (1999) discovered that large companies are apt to report their environmental performance and community involvement through their annual reports. However, this study only examined corporate literature and did not conduct research of organizational members to determine why these disclosures were made and what the benefit may have been as a result for either the organization or its stakeholders. The research looked at

companies in the United Kingdom only and the results cannot be generalized to other cultures. Neither Brammer and Pavelin (2004) nor Clarke and Gibson-Sweet (1999) studied the impact disclosures have on audiences and what if any benefit the organization or public gained by this information. Clarke and Gibson-Sweet mentioned the potential benefit of improving market performance (1999, p.5) but there was no evidence provided about whether or not publics accessed the information, understood it, and needed it to make an informed decision about something that impacted them. The studies were one-sided and only considered the information the organizations provided and did not look for public impact.

There are scholars who have examined the potential benefits of disclosure, which might explain one of the motivations for providing information publicly. For example, in 1987, when Chrysler, an American automobile manufacturer, disclosed that it was selling cars as new, which executives previously used but disconnected the odometers to give the appearance that the vehicles had not been driven, one author reported that the company's share price actually increased (Pratt, 2004, p.16). This may have been an anomaly but Mercer (2005) conducted a study to determine the perception of credibility among managers who report bad news about their company. Mercer found that managers of organizations who report positive news are rated as having higher credibility than those who report negative news (Mercer, 2005, p. 740). The study also found that managers who fail to warn of negative news do not take long-term credibility hits compared to those who warn of bad results (Mercer, 2005, p. 741). The Mercer study was conducted on a small sample of 244 business school students, who were not invested in the company. The results are interesting but due to the lack of a representative sample of the population, it is unlikely that they can be generalized. Findings from the Mercer (2005) study may provide an indication as to why organizations have a bias toward reporting good news and the research may give insight into why companies avoid disclosing bad news. If according to Mercer's (2005) results, the credibility of management teams remain unscathed when they failed to forecast negative results then the motivation to disclose is minimal.

If organizations are interested in building trust in their communities and confidence in their institutions, disclosure may provide a path to achieve legitimacy and credibility among their stakeholders. Jahansoozi (2006, p. 80) wrote about transparency between organizations and publics and she mentioned that it is a prerequisite for other elements such as trust and commitment to occur. She mentioned that transparency provides the conditions that allow trust, accountability, cooperation, collaboration and commitment to flourish and is considered a necessity for ensuring accountability, preempting issues and averting expensive crises (Jahansoozi, 2006, p. 80). As publics are demanding ethical behaviour from organizations, transparency becomes a necessity in order for the organization to gain the trust that it is doing what society expects of it (Jahansoozi, 2006, p. 83).

Coombs and Holladay posit that: *'true transparency is reflected in the ability of constituents to identify relevant content areas, search for information about those content areas, evaluate if it is sufficient to meet their informational needs, request additional information when it fails to meet their needs, and assess the overall responsiveness of the organization. True transparency must include responsiveness by the organization to meet constituent needs'* (Coombs & Holladay 2009, p. 8).

Similarly, Rawlins (2009) wrote that transparency has three important elements: information that is truthful, substantial and useful; participation of stakeholders in identifying the information they need, and objective balanced reporting of an organization's activities and policies that holds the organization accountable to its publics (Rawlins, 2009, p. 74). These definitions and descriptions of transparency are important to the model in this thesis. The emphasis on how to meet the information needs of stakeholders is what is currently missing in the literature and the model developed through this research is an attempt to fill this gap by ensuring disclosure strategies are responsive to stakeholders needs for information.

There is interesting work related to the concept of transparency and openness in healthcare relevant to this thesis (Gordon & Daugherty 2003, Abadia-Barrero & Larusso 2006, Fallowfield, Jenkins & Beveridge 2002, Darr 2001). Healthcare scholars have been examining questions about transparency and disclosure to determine why clinicians should provide information to patients and

their families about errors and why organizations should be supportive of these activities.

Disclosures between clinicians and patients can involve providing details about errors, diagnoses and prognoses. It is intriguing to see from healthcare research that the burden of knowledge weighs heavily on clinicians charged with the responsibility of delivering specifics to a patient. It might be possible to draw a parallel here with the relationship a clinician has with a patient and the relationship between an organization and its public. It may seem far-fetched to draw an analogy between patient/physician and organization/public disclosures but it could be useful in understanding how they are performed effectively. The use of metaphors to describe organizational activity is not without precedent. Morgan (1997) explored the idea that, *'theories of organization and management are based on implicit images or metaphors that lead people to see, understand and manage organizations in distinctive yet partial ways. The use of metaphors implies a way of thinking and a way of seeing that pervade how we understand our world generally. We use metaphor whenever we attempt to understand one element of experience in terms of another'* (Morgan, 1997, p. 4).

Interestingly, both clinicians and communicators in organizations possess knowledge that if shared with a patient or public has the potential to allow people to make an informed decision. Granted, the organization may not be providing therapeutic advice to a public as is the case with the patient/clinician relationship but the principles of exchanging information between organization and public and clinician and patient may have some relevance to developing a disclosure model.

Gordon and Daugherty (2003, p. 151) conducted a study using focus group methodology with oncologists to elicit their perceptions of how they disclose prognoses to patients. The researchers surmised that patients need to be informed to make decisions about their lives and future care. This understanding can be promoted and facilitated or even created by physicians through direct communication with patients (Gordon & Daugherty, 2003, p. 143). Gordon and Daugherty found that physician attitudes toward disclosing prognoses with patients can be characterized as 'reluctant' (2003, p. 157) with respect to communicating unfavorable news. Physicians expressed concern about providing negative prognostic information for fear of damaging the physician/patient

relationship and diminishing the possibility of hope for a cure even where there may be none (Gordon & Daugherty, 2003, p. 153).

Although the sample may not be representative of opinions in the broader population, the Gordon and Daugherty (2003) study highlighted the fear among physicians of damaging relationships with patients by disclosing bad news. It would be interesting to see if organizational leaders share a similar anxiety when beset with having to communicate potentially damaging information that should be disclosed. The potential negative consequences a disclosure may have on relationships between individuals and their care-givers or organizations and their publics may be seen as an impediment to transparent communication but the necessity for people to receive information remains vital to an effective and ethical outcome of the situation. This ethical conundrum will be explored in more detail in Chapter V, section 2.0.

Evidence has shown that withholding information from patients can lead to disastrous consequences. In an ethnographic study of children living in an HIV/AIDS hospice in Brazil, Abadia-Barrero and Larusso (2006, p. 40) found that there was a complete lack of information provided to children about their illness. The study showed that in the absence of an adequate educational program about HIV/AIDS, as children in the home became adolescents they stopped believing the seriousness of their disease, which led to risk behaviours such as unprotected sex and treatment adherence problems. In a study of the treatment of palliative care patients, Fallowfield, Jenkins, and Beveridge (2002, pp. 298-299) found that failure to give adequate information about test results and inability to disclose the true therapeutic aim of care can leave patients isolated and scared thinking that nothing can or will be done for them. They suggested that there is little or no evidence supporting the contention that terminally-ill patients who have not been told the truth of their situation will expire in 'blissful ignorance' (Fallowfield, Jenkins, and Beveridge, 2002, p. 302). What is interesting about this study in relation to the development of a disclosure model is the importance of truth-telling despite how grave the information may be. The lesson for organizations from the Fallowfield, Jenkins and Beveridge (2002) study may be that withholding information could cause



more harm than good if it deprives someone of the ability to make rational decisions about their future. The notion of 'causing more harm than good' appears as an ethical question in the decision-tree of the model and will be discussed in more detail in Chapter VI (p. 222).

This section has provided some insight into the motivations behind disclosures by examining research that investigated organizational communication of information and interpersonal dialogue between healthcare professionals and patients. Based on the information presented here, it is clear that disclosures present difficult decisions for people about what to communicate and how to do so to ensure the audience, the receiver of the information, is able to feel informed and has the ability to create a dialogue with the intent of becoming better educated about the issue. Whatever the motive or reason for an organization or individual to disclose information, it would seem that the missing ingredient in the research presented thus far is for the discloser to consider or assess the information needs of the audience. In the next section, the question of what information organizations disclose will be addressed, which should provide some insight into the gap that exists between the information organizations are providing and what audiences may need.

### **3.2 What Information do Organizations Disclose?**

Information that organizations provide to their audiences and stakeholders can range from relatively benign reports about community involvement to more serious matters of describing how an error may have occurred. A prevalent theme in the literature about what organizations disclose seemed to be attempts to explain to the public the truth about something it has done, is doing or will do in the future. The model presented in this thesis is intended to help communicators and organizations make decisions about disclosures with the needs of the stakeholders in mind.

To get a sense of what organizations tend to disclose to their publics, Robertson and Nicholson (1996) examined the extent to which organizations issue general statements about corporate social responsibility compared to specific commitments companies make in this area. As discussed earlier in the Literature Review (p. 20), corporate social responsibility describes the activities, policies or

actions which identify a company as being concerned with society related issues (Roberts, 1992, p. 595). The Robertson and Nicholson (1996) research focused on the view that 'corporate social responsibility' does not dictate that an organization needs to be concerned with every element of society in which it functions but rather, the concept mandates that an organization be concerned with remedying the social problems it has caused and avoid potential problems associated with the business's day-to-day operations. The authors suggested that the focus of corporate social responsibility is the interface between an organization and its operating environment rather than between a business and society as a whole (Robertson & Nicholson, 1996, p. 1096). What is relevant about this work to this thesis is that it is one of the few studies that mentioned the notion of targeting communication efforts to specific publics rather than taking a more general approach but it did not discuss how to define or prioritize publics to receive information. The 'Disclosure Stakeholder Pyramid' which appears as part of the model in this thesis (Chapter VI, p. 215) provides a method of prioritizing audiences in disclosure situations.

Robertson and Nicholson (1996) conducted a survey with 1,000 companies in the United Kingdom that included 299 completed questionnaires and a review of supporting documents such as annual reports, mission statements, and codes of ethics (p. 1098). They found three levels of social responsibility disclosure i) corporate rhetoric, ii) specific endeavors, and iii) implementation and monitoring (Robertson & Nicholson, 1996, p. 1098). In the study, survey data combined with the corporate literature, revealed most organizations are well established at the 'corporate rhetoric' level, which means the company may have mentioned the term 'social responsibility' or like phrases but did not provide details about specific programs (Robertson & Nicholson, 1996, p. 1099). At the 'specific endeavors' level, organizations demonstrated initiatives that are tied to the organization and its operating environment such as recycling programs (Robertson & Nicholson, 1996, p. 1101). At the 'implementation and monitoring' stage, organizations are involved in annual environmental audits or reviews, and they set targets, and report publicly on the progress they have made. The authors suggested that a great many of the programs at the implementation and monitoring stage are in response to government pressure or fallout from organizational wrongdoing (p. 1101). Organizations

at the implementation and monitoring stage are likely to have made changes to their design and employee compensation and incentive systems. For example, the auto repair section of Sears, the large American retailer, disclosed that its mechanics were completing unnecessary auto repairs to gain commissions that supplemented their income. As a result, Sears discontinued the practice of incentive compensation for its mechanics (Robertson & Nicholson, 1996 p. 1101).

This study not only examined what companies disclose publicly but also puts forth a hierarchy of social responsibility that moves from the lip service companies pay to these activities to a review of actual programs. However, it would have been helpful to have some insight offered about how an organization should prioritize publics to receive disclosure information in addition to exploring communication to a more general audience. Another piece missing from the study is the impact that disclosures have on an organization and its audiences. Coombs and Holladay (2009) suggested: *'stakeholders should define what information they want from organizations and judge the organization's degree of transparency on its ability to meet their information demands. If an organization discloses a terabyte of information but it is of no interest or use to constituents, the organization is not transparent'* (Coombs & Holladay 2009, p. 5). The model presented in this thesis, includes an evaluation component that is sensitive to the needs of stakeholders (discussed in Chapter VI, pp. 243-244), which avoids a useless 'data dump' of information that stakeholders can neither understand nor use to make decisions. Thus far, the business literature has looked at the organizational role in communication and not much consideration has been provided to the impact disclosures have on audiences.

In an attempt to understand organizational risk associated with transparency, Lajili and Zeghal (2005) looked at disclosures of organizations by conducting a content analysis of the number of words and sentences used in a company's annual report that refer to specific threats to the organization. The study reviewed annual reports of companies listed on the Toronto Stock Exchange top 300. The study found the most commonly disclosed risks in annual reports were financial and of these, the most frequently mentioned is exposure in foreign markets and how the fluctuation of the

Canadian dollar might affect bottom-line results (Lajili & Zeghal, 2005, p. 131). The second most common risk they found companies disclosed is market and commodity risk, defined by the high degree of competition, which may result in losses. Responses to these types of risks included commitments to develop customer loyalty, product innovation and the skills to manage change (Lajili & Zeghal, 2005, p. 138). This study is another example of looking at data from annual reports which has a fairly narrow audience appeal. It would have been beneficial for the study to examine other avenues of disclosure such as websites, news releases and other communication to get a better sense of what organizations disclose. It would have also been helpful to survey the intended audience for this information such as shareholders and analysts to determine the value and merit of these disclosures.

Moving from the corporate sector to healthcare, a study Lamb, Studdert, Bohmer, Berwick, and Troyen, conducted in 2003, based on responses from risk managers in American hospitals, showed a total of 65% of institutions always disclose incidents of death or serious injury (p. 73). Somewhat unexpectedly, they found the potential for negative media coverage did not affect a hospital's willingness to tell patients about harm and in fact 79% of respondents to the study had received negative coverage as a result of an adverse event but still negative publicity was not a factor in determining whether or not to disclose (Lamb, Studdert, Bohmer, Berwick, & Troyen, 2003 p. 73). The authors also found that organizations were more willing to disclose non-preventable versus preventable harms (ibid). Responses to the study may have been different if the survey targeted clinicians directly involved in adverse incidents who would be open to personal liability however, it is encouraging to see that those with an organizational responsibility for disclosure seemed to favour providing as much detail to people as possible even though the information could negatively impact the institution's reputation. One of the issues that will be addressed in the disclosure model (Chapter VI, p. 239) is who should convey the disclosure message on behalf of the organization.

One of the most progressive examples in the literature of disclosing information from an organization to an audience is found in a United States Veterans Hospital in Lexington, Kentucky. Wu (1999)

wrote that the hospital has a policy of early injury review that gives a full disclosure of findings to the patient and offers fair compensation for the event. This practice has led to many settlements rather than costly litigation since its adoption in 1987 (Wu, 1999 p. 971). The hospital actually offers assistance in filing claims and interestingly, this practice has not resulted in an onslaught of lawsuits. The hospital's risk management committee has been able to negotiate settlements to many cases without involving legal counsel (Wu, 1999 p. 971). However, as Wu pointed out, the Veterans Hospital system is not representative of the entire U.S. medical system and is usually populated with patients who are older men who have limited means to pursue costly litigation. In addition, government physicians in these hospitals are not subject to personal liability and are not named in malpractice lawsuits (Wu, 1999 p. 971). Although the relative risk is not as high in a U.S. Veterans Hospitals as it might be in other organizations in terms of liability, it is compelling to see that even though the organization provides full disclosure, the resulting legal action from audiences is minimal.

In looking at the needs of an audience, Liebman and Hyman (2004, p. 22) suggested that in the case of medical errors there is a mismatch between what patients want and what they are provided. The authors found that patients and families are usually looking for basic information about the event, assurances they will not suffer financially as a result of the occurrence, an apology, and knowledge of the steps the organization is taking to prevent similar events in the future. According to Liebman and Hyman (2004, p. 22), research has found that after full disclosure of an adverse event and an apology, respondents were more trusting, satisfied and less likely to sue physicians. Liebman and Hyman (2004) observed that it is not necessarily the quality of medical care or negligent treatment per se that usually leads to litigation but rather ineffective communication surrounding the disclosure such as: the perception among patient and family that the physician was not completely honest and a sense that the physician was not listening to their concerns (p. 22). The lessons here of physicians being open and honest with patients when disclosing errors may be applicable to organizations when communicating disclosure situations with their stakeholders. The framework for disclosure that Liebman and Hyman (2004, p. 22) suggested (i.e. providing basic information about the event, assurances, and explaining the steps to prevent a recurrence) is similar to the feedback from some

of the interviewees in this research (Chapter IV, pp. 129). The data from the interviewees about the information stakeholders need to make an informed decision about a disclosure, appears as part of the model which is presented in Chapter VI (p. 247).

This section provided some indication of what types of information organizations disclose to their publics. Unfortunately, none of the studies provided advice on how to segment and prioritize audiences in a disclosure situation and the literature thus far has paid little attention to the needs of those who are receiving organizational messages. Interestingly, as pointed out earlier in this section, studies in the healthcare field have shown that the more effective the information can be provided to injured parties, the less likely they are to take punitive action toward either the person or organization delivering the information. There may be a similar lesson here for organizations. The more open they are with stakeholders, the less likely they may be exposed to public criticism. But what determines whether or not an organization will release information? In the next section, variables such as organizational size, environment and history of social performance are examined to determine their impact on the release of information.

### **3.3 Determinants of Organizational Disclosure**

What compels an organization to disclose information that may not provide any immediate fiscal benefit to the business and could possibly harm the organization? MacLagan employed rationalistic ethics and suggested that a consequentialist position requires us to consider the outcomes of an action, irrespective of the motives behind it (MacLagan, 1998, p. 26). One of the most widely discussed consequentialist theories is utilitarianism and according to this theory the morality of an action depends on its impact on the well-being or happiness of people affected and depending on the calculations involved, utilitarianism may justify harm to some people if this is outweighed by a greater good (MacLagan, 1998, p. 26). Non-consequentialism or deontological ethics includes theories which focus on the moral duty to follow courses of action which are believed to be intrinsically right such as truth telling or promise keeping and to refrain from wrong actions such as lying or breaking promises. According to this position, the consequences of an action have no

bearing on rightness or wrongness (Maclagan, 1998, p. 26). So, the question lingers, what criteria or principles should an organization consider before deciding to disclose information? Should an organization take a consequentialist approach that looks at the greater good or should it take a non-consequentialist approach and do what is morally acceptable to the society in which it operates? This question will be addressed more fully in Chapters V (p. 187) and VI (p. 221) where the ethics of decision making about disclosure will be discussed.

A decision to disclose information publicly is not necessarily made based on management discretion alone and several factors can play a role in determining whether or not an organization will communicate information to its publics. In their study of 134 companies in the United Kingdom, Brammer and Pavelin (2004) found that disclosures are positively related to an organization's size, media exposure, social performance, and are more common in industries that have a perceived association with social issues and concerns (Brammer & Pavelin, 2004, p. 89). Through their examination of several data bases which hold information about corporate community involvement and environmental activity, as well as a review of annual reports, the researchers concluded that organizations with a high media exposure and those that are large and publicly visible, face greater external pressures than smaller organizations with a lower profile and this may motivate them to make social disclosures more often to manage their relationships with stakeholders (Brammer & Pavelin, 2004, p. 91). In this study, it would appear that larger organizations, who perhaps can withstand the expense of a disclosure, take a more non-consequentialist approach to disclosures than smaller organizations that may have to consider the impact of disclosures on their livelihoods.

In a similar study to Brammer and Pavelin (2004), Clarke and Gibson-Sweet (1996) examined the annual reports of the top 100 companies in the U.K. and they found that what is reported will vary over time based on the emphasis and trends in society such as the need for information about the environment or employee safety (Clarke & Gibson-Sweet, 1999 p. 6). The authors suggested that disclosures are also dependent on the industry, for example, mining and oil companies provide environmental information to diffuse stakeholder concerns and to counter the threat of regulatory

legislation (Clarke & Gibson-Sweet, 1999, p. 6). Consistent with the Brammer and Pavelin (2004) research, Clarke and Gibson-Sweet found that size is a factor in determining the amount of corporate social reporting and that larger companies are more likely to receive attention from the public compared to their smaller counterparts (ibid).

Based on the cases presented above, it seems that a great number of corporate disclosures either benefit or do little to harm the organization and its reputation. These studies have not examined controversial disclosures such as product recalls, therefore it is difficult to determine from this literature whether or not a consequentialist or non-consequentialist approach as defined by MacLagan (1998) is the preferred method of determining whether or not to release information. Social disclosures such as discussing employee training or promoting safety and wellness are important to the organization and may provide comfort to external audiences but these types of issues may be easy for an organization to discuss publicly. The development of a model for disclosure will require a closer examination of which criteria an organization and more specifically public relations practitioners can use to provide advice on choosing a path of disclosure that is best for the organization and its publics. In addition to an organization communicating potentially damaging information, there are instances where individual members of an organization break ranks and speak outside of the organization's structure to shed public light on an issue. This is known as whistle-blowing and is discussed next.

#### **4.0 WHISTLE BLOWING: ROGUE ORGANIZATIONAL DISCLOSURES**

Miceli and Near defined whistle-blowing as: "...*whenever current or past members of an organization disclose illegal, immoral or illegitimate actions or omissions, to parties who can take corrective action against the wrongdoing*" (Miceli & Near, 1994, p. 773). Disclosures of this nature are not typically sanctioned by an organization and given their propensity to operate outside of a company's communication channels, 'whistle-blowing' activity will not be considered in the model developed through this study. The purpose of this thesis is to build a model for disclosures that an organization



and its leadership team support, however taking a brief examination of the literature in this area may reveal some of the underlying motivations for whistle-blowing activity, which could inform the creation of a model. Gaining an understanding from the literature in this area may offer some insight into what information organizations should be communicating to publics.

#### **4.1 Why do People Blow the Whistle?**

In an emotionally gripping first person account of blowing the whistle on medical staff in a British hospital who were conducting risky cardiac surgeries on children, Bolsin (2003) described his efforts to expose the situation as, "...*an extremely unpleasant experience*," that he would not recommend to others and should always be used as a last resort (p. 294). In his case, he attempted to recruit colleagues to stop the dangerous operations, tried to persuade others to his view, spoke to people who took up the cause, canvassed opinions outside of the organization and informed the department of health but the operations persisted (Bolsin, 2003, p. 294). Finally, he transferred to a hospital in Australia and disclosed the information in a documentary entitled *Broken Hearts* (ibid). It would seem from the article that there were no other options for Bolsin and the final step was for him to discuss the issue publicly. The obvious question in this situation is what else could he have done to resolve the situation? In this situation, an established and well-known method of organizational disclosure may have helped deal with Bolsin's concern and potentially have saved lives, a career, and maintained public confidence in a healthcare system.

There are a number of factors that determine the course of action a whistle blower will take in disclosing information. According to Miceli and Near (1985, p. 540), a whistle-blower's choice of internal versus external channels of disclosure is dependent on the circumstances surrounding the complaint: the more extreme the wrongdoing, the more likely the whistle-blower is to inform authorities outside the organization. Whistle blowers tend to stay inside the organization when the wrongdoing is at odds with other operations and the organizational climate is less retaliatory. When wrongdoing is serious and the organization signals that it is dependent on the wrongdoing, observers go outside of the organization to report it (Miceli & Near, 1985 p. 538). The Miceli and Near (1985)

study used data that were gathered from a survey conducted on civil servants in the United States government and the information may not be generalized to other sectors but the data provide insight into the rationale for whistle blowing behaviour and may explain why Bolsin (2003) felt that he had to disclose the situation publicly. He received little satisfaction for his concerns internally and eventually, after all avenues of appeal were exhausted, Bolsin went public and told his story on a documentary television show.

What might be particularly relevant for this research from Near, Dworkin and Miceli (1993) is their finding that legalistic actions, which organizations implement in the form of policies and procedures seem to be more effective than legislation at encouraging organizational members to come forward with issues that need to be disclosed (p. 403). This may suggest that the organization through its leadership has an influential role to play in creating a climate whereby its members can feel empowered to come forward with information that could be disclosed.

#### **4.2 Who Blows the Whistle and How do Organizations Respond?**

There were two types of whistle blowers mentioned in the literature, those who have the function as part of their role such as an internal auditor and those who do not have it as a prescribed function of their job but for whatever reason feel compelled to correct something the organization is doing. Near and Miceli (1995, p. 700) pointed out that non-prescribed whistle-blowers may be more effective than those who have the function as part of their jobs, due in large part to the fact that their actions might include extra effort and risk.

To determine the rationale for someone blowing the whistle, Dozier and Miceli (1985) asked the question, why will some observers of wrongdoing blow the whistle while others ignore it? Dozier and Miceli, looked for similarities between the characteristics of good Samaritan by-standers who intervene to prevent a crime or provide medical assistance to someone in need, and those who blow the whistle on organizational wrongdoing. They suggested that whistle blowing is not an act of pure altruism but rather is a pro-social behaviour, with both selfish and unselfish motives on the part of the

actor (Dozier & Miceli, 1985, p. 823). They also suggested there is more whistle blowing behaviour among highly moral individuals when the organizational climate is supportive of this action and when members are informed of whistle-blowing channels (Dozier & Miceli, 1985 p. 829).

Understanding some of the personality traits associated with who might blow the whistle and what the underlying motivation is for the action, will help inform the development of a model of how organizations can disclose information. The elements of someone's personality that might lead to blowing the whistle might also be reflected in the personality or culture of an organization. As Dozier and Miceli (1985, p. 829) suggested in their research, if a person with high moral standards is more likely to blow the whistle then perhaps a similar notion can be true of people in organizations where the corporate culture promotes openness and transparency both internally and with the communities the organization serves. Organizational cultures that can be described as highly moral may be more likely to disclose information than those that are not. The literature on organizational culture and climate will be reviewed in section five of this chapter (pp. 45-58) but before delving too deeply into this subject matter, it might be worthwhile to examine how organizations respond to those who blow the whistle to determine the differences in responses to unplanned disclosure.

Near, Dworkin and Miceli (1993) suggested that whistle-blowing represents an influence process in which the whistle-blower attempts to exert power over the organization or some of its members in order to persuade the dominant coalition to terminate the wrongdoing. In response, the dominant coalition typically acts in one of three ways: it may terminate the wrongdoing, do nothing, or retaliate against the whistle-blower (p. 394). The researchers found that management retaliation for whistle-blowing is more likely when the organization's culture or climate is harmed by the wrongdoing, when the initial complaint is unresolved and when low-value congruence exists between management and the whistle-blower (Near, Dworkin and Miceli, 1993, p. 403). In a subsequent study, Miceli and Near (1994) found that if the wrongdoing enhances performance or is crucial to the bottom-line then the organization may retaliate against the whistle-blower (p. 777). Meaning, the organization may be dependent on the wrongdoing and if this is the case then the act of blowing the whistle could impact

the organization and its members and would therefore result in a negative response from the management team. Alternatively, Miceli and Near (1994) found that if the organization is harmed by the wrongdoing, retaliation may be less likely because the organization could be seen publicly as a victim of the situation rather than the perpetrator and it would be less likely to be on the defensive in terms of a response (Miceli & Near, 1994, p. 777).

Whether or not an organization responds positively to whistle blowing seems to be determined by the organization's level of dependence on the wrongdoing as Miceli and Near (1994) suggested and the value congruence that the dominant coalition has with the person raising the concern as Near, Dworkin and Miceli (1993) put forward. If the organization is dependent on the action and perhaps has a set of values that is not aligned with the person blowing the whistle then, according to the research reviewed above, it may be unlikely that the efforts to shed light on organizational wrongdoing will be effective in stopping the disclosed action in the absence of legal intervention. It is conceivable however that public attention could result in regulatory action.

Based on the research reviewed here, whistle-blowing may take place when there is moral or value incompatibility between an organization and an individual and the person disclosing the information sees no other option for resolution. Whistle-blowing may also take place if there is a particularly vengeful employee who feels wronged by the organization and is bringing information to light that may harm the organization. Disgruntled employees aside, the question of organizational ethics and morals seems to be the common denominator in these cases and the need for the company and staff member to share similar views with each other and have those consistent with societal norms of acceptable behavior and responsible action.

Given their extensive research into the phenomenon of whistle-blowing, it is intriguing to see Near and Miceli suggest that many whistle blowing incidents are ineffective at creating change and in worst-case scenarios, the action benefits no one and harms many including the whistle-blower who may suffer retaliation (Near & Miceli, 1995, p. 703). In cases of anonymous whistle blowing, Miceli,

Roach and Near (1998) found that the initiative may create dissention and mistrust in an organization and that loyal employees, who are simpatico with the organization's culture would most likely not come forward for fear of upsetting the organization and its business (p. 282). Interestingly, on the topic of 'crisis prevention' Tombs and Smith (1995) wrote that almost all crises uncover pre-event warning voices which have been ignored because they come from either 'outsider' groups (such as workers, environmental or consumer groups and journalists), or individuals who are relatively marginalized within corporate structures such as safety officers (p. 143). If an organization has an effective 'early warning system' in place that is in tune with its stakeholders and employees there may be opportunity to avoid crises and whistle-blowing activity.

Although whistle-blowing is typically conducted outside of an organization's formal communication channels and is performed without the sanction of the company's leadership, this research can inform the development of a disclosure model. The research on whistle-blowing may mostly provide a cautionary tale in terms of what not to do as an organization but the examples of ensuring there are adequate outlets and communication vehicles for staff to bring issues of concern forward may be worth exploring to avoid whistle-blowing behaviour. If an employee has a vendetta against the organization and chooses to disclose private information publicly, the organization that has internal channels for bringing information forward from the front-lines to management, and has a track record of transparency, may be able to defend individual criticism based on its credible history.

In the next section of the Literature Review, organizational culture and climate will be examined to determine if they have an impact on disclosure communication.

## **5.0 ORGANIZATIONAL CLIMATE, CULTURE AND DISCLOSURE**

One of the four research questions asked in this thesis is: *'How does the organization's culture affect both its willingness to communicate and its use of specific methods or strategies to disclose information publicly?'* To help answer this question, this section of the Literature Review will first

provide a brief history of organizational climate and culture with the help of work from Ashkanasy, Wilderom and Peterson (2000). Definitions of both climate and culture are provided next with reference to the work of Hofstede (1980), Schein (1985, 2000, 2004), Schneider (2000) and others. In the final part of this section the implications of climate and culture for public relations practice and specifically for disclosure communication is examined with reference to researchers such as Sriramesh, Grunig and Dozier (1996) and Barry and Crant (2000).

### **5.1 Climate and Culture an Overview and Definition**

According to Ashkanasy, Wilderom and Peterson (2000, p. 3), a team of researchers named Lewin, Lippitt and White coined the term 'social climate' in 1939 to describe the attitudes, feelings, and social processes that they observed during experiments they conducted on groups of boys at an American summer camp. They tried to see a correlation between boys' activities as having different effects depending on the climate of leadership that each of their group leaders at the camp displayed. Leaders of the groups were told to act in democratic, autocratic, and laissez-faire styles and Lewin and his colleagues observed the reactions each of the groups had to the different styles. They found that the groups of boys reacted differently depending on the 'climate' or approach the leader of each group took (Ashkanasy, Wilderom & Peterson, 2000, p. 3). Lewin believed that leadership could influence climate and his analysis of groups at the summer camp was a microcosm of his analysis of the development of fascism in Germany (ibid). Lewin felt that fascism was a societal climate that leadership created and it was his hope to research it in an attempt to discredit it scientifically and determine that its ideology and political processes would not spread while it was being defeated militarily (Ashkanasy, Wilderom & Peterson, 2000, p. 3).

Climate research is grounded in the Gestalt psychology of Lewin. From Gestalt psychology comes the critical notion of the whole – the Gestalt – meaning that individual elements of perception are formed into wholes that represent more than the simple sum of the specifics of the individual elements (Schneider, Bowen, Ehrhart, & Holcombe, 2000, p. 22). Organizational climate is a gestalt that is based on perceived patterns in the specific experiences and behaviours of people in

organizations (ibid). When experiences and behaviours are perceived to be patterned in particular ways, the gestalt that the pattern connotes in the abstract constitutes the climate of the situation (ibid). The sense people make of the patterns of experiences and behaviours they have, or other parties to the situation have, constitutes the climate of the situation (Schneider, Bowen, Ehrhart, & Holcombe, 2000, p. 22).

Lewin unfortunately died in 1947 at the age of 56 and his successor, moved the research work to the University of Michigan where it became part of the 'Survey Research Centre' and began to develop more quantitative approaches to defining an organization's climate which were aggregates of data from attitudinal surveys (Ashkanasy, Wilderom & Peterson, 2000, p. 3). According to Ashkanasy, Wilderom and Peterson, the use of surveys became the dominant way in which organizational studies of the 1960s and 1970s provided an overall sense of the social processes within organizations (2000, p. 4). In the United States, in the 1970s and 1980s, attention began to shift from climate research to culture due to a number of factors that Ashkanasy, Wilderom and Peterson described as the priorities of some of the main funding sources for this work shifted focus and organizational researchers began to look at methods that were found in other fields such as cultural anthropology (Ashkanasy, Wilderom & Peterson 2000, p. 5). The study of culture from an anthropological perspective (such as ethnography, etc.) brought ways of thinking 'holistically' about systems of meaning, values and actions (ibid). The holistic approach to cultural anthropology research brought back Lewin's initial concept of looking at 'social climate' as a gestalt or whole that survey research may have neglected (Ashkanasy, Wilderom & Peterson 2000, p. 4).

It is interesting to see how researchers in both climate and culture have described the concepts as almost competing approaches to defining how organizations function. Schneider (2000) for example appeared to be somewhat indignant about the rise of cultural research when he wrote that there is a failure among climate researchers to adopt a more observational methodology in addition to the use of surveys to study anthropological issues of norms, taboos, myths and stories, which he suggested 'opened the door for an invasion by the younger sibling' (i.e. culture) (Schneider 2000, p. xix). Schein

wrote: *'climate is embedded in the physical look of the place, the emotionality that employees exhibit, the experiences of visitors or new employees upon entry, and myriad of other artifacts that are seen, heard and felt. It is equally obvious that climate does not explain itself. Other variables are needed to explain why different organizations feel different'* (Schein, 2000, p. xxiv). Schneider is critical of Schein's definition of climate and suggested that he has only viewed organizational climate by referring to its relationship to the organization's physical environment (Schneider, 2000, p. xviii). Schneider claims to be unfamiliar with any climate researcher who has referred to climate as the built physical environment (ibid). Schneider explained that climate causes culture but the reverse is also true and that they are two complementary ideas that reveal overlapping yet distinguishable nuances in the psychological life of organizations (Schneider, 2000, p. xxi).

Viewing culture and climate as complementary rather than competitive may be an effective approach to improving knowledge of how organizations function. This would allow researchers to use the best of both to answer questions such as how organizations can respond and adapt to technological and political change. There appears to be more similarities than differences between the two terms regardless of whether one is more quantitative or qualitative in its approach to gathering and analyzing data. As can be demonstrated from the definitions below, both climate and culture are concerned with attitudes and perceptions of members of a group and how they define norms and respond to their environment.

Ashkanasy, Wilderom and Peterson described organizational climate as *configurations of attitudes and perceptions by organization members that in combination reflect a substantial part of the context of which they are a part and within which they work. It is usually conceived of being structurally realist, deductive, and based on survey methods* (2000, p. 8).

Schein defined culture as: *'a pattern of shared basic assumptions that was learned by a group as it solved its problems of external adaptation and internal integration, that has worked well enough to be*



*considered valid and therefore to be taught to new members as the correct way to perceive, think, and feel in relation to those problems'* (Schein, 2004, p. 17).

Similar to the above description of culture from Schein, Hofstede (1980, p. 21) described culture as: *'the collective programming of the mind which distinguishes the members of one human group from another. Culture is to a human collectivity what personality is to an individual and can be further defined as the interactive aggregate of common characteristics that influence a human group's response to its environment. Culture determines the identity of a human group in the same way as personality determines the identity of an individual'* (Hofstede, 1980, p. 21).

Eisenberg, Goodall and Trethewey (2007, p. 127) suggested that organizational culture represents: *the actions, ways of thinking, practices, stories and artifacts that characterize a particular organization*. Sriramesh, Grunig, and Dozier wrote that culture is: *generally viewed as a construct that describes how people reduce ambiguity and facilitate interaction in social settings* (1996, p. 232). They further narrow the definition to organizational culture, which they described as *'the rules of the game for getting along in a firm or the so called "ropes" that a newcomer must learn in order to become accepted as a member'* (ibid).

In the definitions above, there seems to be some consistency in the descriptions of both climate and culture as referring to either the prevailing attitudes and perceptions of a group or how the 'personality' of a group is defined and characterized in relation to how the group functions and solves problems for example. What has not been described yet is how organizational cultures develop a sense of perception around ethical decision making and how a group determines what it will consider to be 'right and wrong'. For this thesis, it has been important to not only understand the concepts of culture and climate but also what constitutes the 'ethical' culture of an organization and how this may shape the process of decision making about disclosure. In a study on organizational climate, Victor and Cullen (1988, pp. 101-102) suggested that the perceptions among organizational members of typical practices and procedures that have ethical content constitute the ethical work climate. When

faced with a decision that has consequences for others, how does an organizational member identify the right alternative? What aspects of work climate determine ethical behaviour? An organization's ethical climate refers to how people typically decide what is right and wrong (Victor & Cullen, 1988, pp. 101-102). How people in an organization make decisions about right and wrong may be related to the overall culture of the group and how they have defined their sense of norms and accepted behaviours. Evidence from the participants in this research, regarding the impact of organizational culture on disclosure decision making is presented in Chapter IV (pp. 158-168).

Now that the definitions of culture and climate have been presented and discussed, the next logical step is to determine the specific 'types' of organizational cultures and climates that may be conducive to disclosure. In the next section, literature on organizational types is reviewed to get a sense of which, if any, are more prone to disclosure.

## **5.2 What Types of Organizational Cultures and Climates are Conducive to Disclosure?**

According to Sriramesh, Grunig and Dozier (1996), an organization may not have a single culture but may have one dominant culture and several other subcultures that are specific to different work groups and teams (p. 237). Schein (2004) suggested that building an effective organization is ultimately a matter of meshing the different subcultures by encouraging the evolution of common goals, languages and procedures for solving problems (Schein, 2004, p. 289). But how is this accomplished and is it possible to ensure subcultures are not operating counter to the dominant culture of the organization? The relevance of culture and subcultures to disclosure communication and decision making might be for the communicator to be aware that these exist and how they influence the development or eventual acceptance or rejection of a recommendation to provide or withhold organizational information to the public.

Sriramesh, Grunig and Dozier (1996, p. 236) mentioned that there are two views of organizational culture 'pragmatic' and 'purest'. Pragmatists contend that corporate culture can be managed or changed and they view culture as a key to organizational efficiency and profitability and argue that it

can be molded to suit organizational goals set by senior executives (Sriramesh, Grunig, & Dozier, 1996, p. 236). In contrast, purists contend that organizational culture is innate, cannot be managed, and that it is developed not by the conscious efforts of the CEO or management team but it is a collection of views that are held and formed by the majority of organizational members (ibid).

Using data collected from the multi-year study on *Excellence in Public Relations and Communications Management*, Sriramesh, Grunig, and Dozier reported the results of research to determine which cultures may be more favorable to two-way symmetrical public relations where the organization works to build mutually beneficial relationships with its stakeholders. They used a questionnaire for the study, which was administered to 4,631 employees in 321 organizations in the United States, Canada and the United Kingdom (Sriramesh, Grunig, & Dozier, 1996, p. 243). They defined two key cultural types, participative and authoritarian (ibid). Although pragmatists and purists could be found in either type, pragmatists would most likely be found in authoritarian cultures and purists might be more aligned with the participative approach to culture that is more evolutionary through involvement of many members of the group (ibid). The researchers found that participatory culture is not a necessary condition for the practice of symmetrical public relations and although it might be more difficult to practice two-way symmetrical communication in authoritarian cultures, the study showed that it is not impossible (Sriramesh, Grunig, & Dozier, 1996 p. 248-253). The study found that participative cultures value collective responsibility, holistic management, long-term employment and people are advanced based on performance (ibid). In participative cultures, there is integration of organizational members into decision-making, and they pride themselves on innovation, liberalism and working toward a compromise with publics. In contrast, authoritative cultures have individually centred values where management is conservative and works to dominate publics rather than reach a compromise on issues (Sriramesh, Grunig, & Dozier, 1996 p. 248-253).

Based on the characteristics of authoritarian and participative cultures and the finding that the two-way symmetrical model of communication can be practiced in both, it is difficult to determine which of the two would be more prone to disclosing information based on the Sriramesh, Grunig, and Dozier

(1996) paper. It is also important to recognize that the Grunig two-way symmetrical model is not necessarily the only approach for organizational communications. The Heath (2001) rhetorical enactment theory, for example, proposes that symmetry is a matter of contesting ideas in public and that reaching a compromise between an organization and public, as in Grunig's two-way symmetrical model, is not always possible. The Grunig two-way symmetrical model of public relations is predicated on the idea of reciprocal change between the organization and public, which in the case of organizational communication could be defined as between the dominant coalition and its employees. According to Everett (2001, p. 317-318) under the terms two-way symmetrical models, public relations practice is successful to the extent that the organization is capable of changing itself to accommodate the needs and demands of its operating environment or in this case the culture of its employees. In a rigid authoritarian culture that is less likely to adapt to change quickly, the two-way symmetrical model may be more difficult to practice and be less likely to embrace the need for disclosures that are brought to the attention of management from employees. Given the emphasis on a holistic approach to management in a participative culture, members of the organization may be more likely to come forward with wrongdoing and make disclosures more freely in comparison to an authoritarian culture where individualism and a closed system are valued. An emphasis on the individual in an authoritarian culture might be more prone to whistle blowing, where people, frustrated by conservatism, could look outside of the organization to bring forward information.

Barry and Crant (2000) looked at dyadic communication in organizations and found a number of factors that influence the quality of information exchange between people. Similar to Sriramesh, Grunig and Dozier (1996), Barry and Crant (2000 p. 658) found that organizational structure plays a role in determining the richness of communication. Barry and Crant (2000) suggested that in organic structures, where there are low levels of formalization, low decision-making centrality and narrow spans of management control, communication will occur with greater frequency and reflect a wider diversity of topics than in more mechanistic or authoritarian structures (Barry & Crant, 2000 p. 658). Unfortunately, the focus of this study was primarily the quality or richness of communication and not an examination of the ethical nature of the exchange or whether or not more difficult information to

disclose such as corporate wrongdoing could be discussed as easily as routine business. It is difficult to conclude from this work if an organic structure is conducive to sensitive disclosures.

In the Sriramesh, Grunig, and Dozier (1996) study, the focus of the work did not include a discussion of ethics and how decisions are made in an organization based on established institutional beliefs and management practice. It would have been worthwhile to glean from the data, information about whether or not the culture considers questions of ethics in terms of what is acceptable practice in the disclosure of information and how leadership structures promulgate a common sense of acceptable behaviour among members of the organization. The tone management sets for its employees about what is right and wrong for the organization and its environment, could be a key ingredient in how disclosures within an institution are facilitated or possibly constricted. Schein suggested that cultures spring from three sources: 1) the beliefs, values, and assumptions of the founders of the organization, 2) the learning experiences of group members as their organization evolves, and 3) new beliefs, values and assumptions brought in by new members (Schein, 2004, p. 225). Based on this, it may be the case that there are a number of factors that make up the 'ethical culture' of the organization and that it is developed not only from the top levels of management but also from the members of the group and the values and experiences new people bring to the organization. Maclagan (1998) suggested that organizational factors shape processes whereby opportunities arise for people to articulate their personal values and to share and compare views with colleagues. Significant among these factors are the style of leadership managers adopt, acceptability of moral language in organizational discourse, and the extent to which people share in moral responsibility for activities and outcomes (Maclagan, 1998, p. 13). Maclagan's (1998) ideas mention that moral responsibility can be shared throughout the organization and that the ethical tone is not necessarily solely set by management and leadership.

An interesting case of management and its influence on staff is the collapse of American energy giant Enron. Before becoming known as one of the most notorious examples of fraud and executive greed in the history of the United States, Enron was voted America's most innovative company, an

advisor to the U.S. government, a *Fortune 500* top 10 player, backed by the world's largest banks, and rated by top market analysts (Tange, Greer & Lawton, 2003, p. 5). In principle, Enron claimed to have a morally worthy set of values: Respect, Integrity Communication and Excellence. On the company's mission statement the sentence, '*Ruthlessness, callousness and arrogance don't belong here*' (Tange, Greer & Lawton, 2003 p. 10). Obviously, there was significant disconnect between corporate literature, which seemed to be laced with ethical platitudes, and what executives and other staff actually did, which led to the downfall of the company.

In a similar investigation of Enron, Seeger and Ulmer (2003) found that executives avoided troublesome knowledge and emphasis was placed on stock-values to the exclusion of all else (p. 59). Enron developed a set of norms that restricted the flow of negative information where bad news was not discussed for fear of affecting the stock price. In the wake of the company's downfall, Enron employees described an almost 'Orwellian' groupthink notion of unwitting collusion that developed as people acknowledged only the positive and never negative news. Hofstede referred to this as a 'closed system of management' that filters out deviant values and unpopular messages (1980, p. 39). The refusal to being open to problems created self-censorship and self-persuasion and even as evidence of inevitable failure was clear, employees continued to buy company stock (Seeger & Ulmer, 2003, p. 68). The deceit was so rampant that when Enron founder and former chairman, Kenneth Lay resigned, he sent staff an e-mail telling them that Enron stock was a good investment and meanwhile, he sold \$16 million of his own holdings (Tange, Greer & Lawton, 2003, p. 12).

Enron is an extreme example of corporate wrongdoing but the case provides evidence of an organization and management team that were out of control and a culture that adopted an almost Orwellian style of communication that eschewed reality or any information that could be construed as damaging to the company's market capitalization. Seeger and Ulmer (2003) suggested that management must play a fundamental role in setting the ethical tone for the organization through their communications and actions. To ensure an ethical climate and culture are created in an organization, Seeger and Ulmer (2003) proposed that management should communicate appropriate

values to create a moral climate, they should maintain adequate communication to be informed of organizational operations, and they should maintain openness to signs of problems and be open to bad news and be able to manage it (p. 59).

Barefoot (2002, p. 50) discussed the conditions senior executives create that can lead to organization members accepting rule bending or breaking as the norm. She suggested several contributing factors that can lead to this type of climate such as executives sending mixed signals on compliance issues, weakening corporate watchdogs such as compliance staff and auditors who believe they should go through the process of their duties but not make any waves, adopting corporate swagger that encourages the need to succeed above issues of compliance, imbuing 'groupthink' among employees where they are encouraged to fall-in-line rather than question practices, and treating company ethics as optional (Barefoot, 2002, p. 50). Although Barefoot (2002) discussed how management can create a climate that promotes ethical or unethical behaviour, the article did not consider other influences on how the organization's climate is formed or that there might be different ethical climates which extend beyond her focus on whether or not an organization is compliant with risk management best practice. Victor and Cullen surveyed employees in four companies to determine the sources of ethical climates and how decisions were made concerning events, practices and procedures requiring ethical criteria (1988, pp. 108-109). The study found three distinct sources of ethical climate in organizations. The first source suggested the ethical climate in the organization is reflective of the social-norms found in the environment in which the company operates and from which it draws its membership (Victor & Cullen, 1988, p. 119). The second major determinant of ethical climate may be the organizational form in terms of its complexity, size and decision making structure, whether it is centralized or decentralized for example (Victor & Cullen, 1988, p. 120). The third major determinant of ethical climate is found in organization-specific factors or unique characteristics of organizations such as their histories and experiences of individual members (Victor & Cullen, 1988, p. 122).

Considering the social-norms of an organization's environment and its form and structure could be helpful in determining how to communicate internally and externally about an issue that an organization should disclose. A communicator who is well apprised of these elements may be able to determine which strategies would be most effective in releasing information but the Victor and Cullen (1988) study did not consider issues of communication. It is not entirely clear from this research what the impact of an organization's climate is on its willingness to disclose information.

In this section, the literature provided a description of two schools of thought on whether or not a culture can be influenced, the role of management in setting the tone for the organization, the various types of climates that exist and how they might influence disclosure, and the characteristics of authoritarian and participative cultures. This research gives some indication of the ethical nature of various climates and in which cultures symmetrical public relations might be practiced, but the literature has not provided deep insight or direct evidence into which cultures and climates are more apt to disclose information. In the next section, the concept of culture and its relationship with communication will be explored further to understand how they impact each other and what this might mean for disclosures.

### **5.3 Culture and Communication: Opportunities for Change?**

If a communicator operates in an organization that is resistant to change in adopting more open approaches to communication, is it pointless for the practitioner to consider attempting to influence a change in culture that would impact the approach to communication? In their 1996 paper, Sriramesh, Grunig, and Dozier presented the idea that the relationship between communication and culture are reciprocal and that changing one will facilitate a modification of the other (p.238). In data from the *Excellence* study, they put forth the idea that not only does culture define the nature of communication but communication contributes to how organizations develop and maintain their cultures (Sriramesh, Grunig, & Dozier, 1996, p. 238). In updating this work in 2007, Sriramesh mentioned that even though societal and organizational cultures are well researched topics, the reality is that there is much more work that needs to be done to better understand the relationship



between culture and public relations (Sriramesh, 2007, p. 517) and how communications is practiced in different organizational cultures. He commented however that there is little doubt that culture affects communication and is affected by it (Sriramesh, 2007, p. 509). The interdependency between culture and communication leads to the question, can one change the other to improve how information is disclosed? According to Sriramesh, Grunig and Dozier (1996), there may be opportunities for communicators to help their organizations change culture and adopt a more open model of information sharing. They suggested that when an organization is misaligned with its environment, performs poorly, and expands rapidly or is divested, the chance arises for communicators to assist in changing that culture in order to implement an excellent model of public relations (Sriramesh, Grunig & Dozier, 1996, p. 241). Similarly, Schein suggested that if any part of the culture is going to change, the system must experience enough disequilibrium to force a coping process that goes beyond reinforcing what is already in place (Schein, 2004, p. 320). A communicator who is motivated to affect a culture change to improve information sharing between an organization and its publics, may want to be aware of shifts in either the environment or organization that could lead to the adoption of a new and more open model of communication.

It seems important that if a communicator is going to recommend to management a shift in procedure that is out of the norm found in the existing culture, the practitioner will need to be aware of how to bring forward the strategy within the current terms of the organization. As Barry and Crant (2000) discovered in their study of dyadic communication, people need to be in tune with the type of existing organizational culture to ensure messages are well received (p. 659). Barry and Crant (2000) stated as an example, an organization whose culture promotes isolated careerism and the pursuit of radical self-interest, may find itself populated with individuals who respond warily to relational messages, viewing such information as subversive rather than expressive (p. 659). It may be difficult for a culture that is hyper-individually focused to see the merits of disclosing information that does not promote their self-interest. Alternatively, Barry and Crant (2000) suggested a high-involvement culture that fosters expressive activity may have individuals perceive relational content as sincere and be predisposed to undertake shifts in the presence of relatively little evidence.

Based on the evidence in this section, it may be possible to influence a shift in organizational culture if there is a compelling need to do so such as a change in the environment or perhaps a change in the leadership of an organization. As Sriramesh, Grunig and Dozier (1996) and Schein (2004) suggested, opportunities exist for cultures to change. From a practical point-of-view, it would have been helpful for the Sriramesh, Grunig and Dozier (1996) paper to provide some weight to the criteria that could signal an opportunity to shift the organizational culture. It is unclear from their work if the misalignment of an organization to its public environment, poor performance, expansion or divestment or another situation has equal gravity in terms of promoting and effectively shifting the culture of an organization. However, it appears that there are elements that can lead to a change in organizational culture. The key will be for a communicator to recognize that these exist and to take advantage of them to influence a shift to a more open model of communications.

In this section, the literature on organizational culture and climate has been reviewed to provide some foundational concepts that will be relevant to discussion that occurs later in this thesis (pp. 158-168 and pp. 298-302). The section has mentioned the origins of culture and climate, provided definitions of both terms and has made an attempt to determine which types of cultures may be more likely to disclose information to the public. As will be seen in the presentation of participant data throughout the thesis, organizational culture has been described as an important contributor to the likelihood of whether or not an organization will disclose information and how ethical decisions about these situations are made. In the next section, a review of the literature on codes of ethics will provide further groundwork to determine the influence of culture on ethical decision making.

## **6.0 CODES OF ETHICS**

A review of the relevant literature on codes of ethics for organizations and various associations of communications practitioners may provide some insight into whether or not they provide a guide for making decisions in disclosures. This section begins with a definition of codes of ethics and how they

are developed. The question of which code of ethics someone should use in disclosure decision making is discussed in the context of organizational, professional and in some cases personal codes of ethics. In the final portion of this section, codes of ethics for various communication associations are examined to determine how they may influence public relations and ethical decision-making. The literature in this section has been drawn from management and business ethics (Bernardi & LaCross 2005, Dobson 2005, Gaumnitz & Lere 2004, Brinkmann & Ims 2003, Schwartz 2002, Fisher 2001, Kaye 1996), public administration (Kinchin 2007) and public relations (Parkinson 2001).

### **6.1 Codes of Ethics: Development and Content**

In the text box below there are two definitions of codes of ethics. The first, from Schwartz (2002, p. 28), describes a corporate code of ethics and the second, from Frankel (1989, p. 110), describes a profession's code of ethics.

*A code of ethics is a written, distinct, formal document which consists of moral and ethical standards which help guide employee or corporate behaviour. Codes of ethics, by their very definition, imply that they contain normative guidelines for behaviour. (Schwartz, 2002, p. 28)*

*A profession's code of ethics is perhaps its most visible and explicit enunciation of its professional norms. A code embodies the collective conscience of a profession and is a testimony to the group's recognition of its moral dimension. (Frankel, 1989, p. 110)*

Since the model developed in this thesis is for a group of practitioners (i.e. communicators) who work for a variety of organizations, it has been important to look at both the definition of an organization's code of ethics and that of a profession or an association. Although not considered a profession, communicators have associations and organizations which have codes of ethics that can be viewed and examined for the purposes of this research. The model developed in this thesis has included an ethical decision tree to help practitioners and their colleagues in their organizations make decisions about disclosures (see p. 222) but which code of ethics should be followed, an organization's or an association's? Another consideration is how does someone's 'personal code of ethics' influence decision-making about disclosures? As will be demonstrated in Chapter IV (p. 129) of this thesis, some of the participants in this research relied on a number of ethical references to make decisions about disclosure, which included their organizations code of ethics as well as their own sense of right and wrong.

In the definition above, an organization and a profession may be specific in their codes about what their 'moral and ethical standards' entail or have defined whatever their 'moral dimension' might be but, how do the members of a profession or an organization know if these codes are ethical?

Schwartz (2002) posed this same question and suggested despite the growth of codes of ethics and corresponding research, codes appear to have been used and discussed in somewhat of a

Proposed set of universal moral standards (Schwartz, 2002, pp. 29-30):

- Trustworthiness: including notions of honesty, integrity, reliability, and loyalty
- Respect: including notions of respect for human rights
- Responsibility including accountability
- Fairness: notions of process, impartiality, and equity
- Caring: avoiding unnecessary harm
- Citizenship: including obeying laws and protecting the environment

normative vacuum (p. 28). An assumption appears pervasive among both academics and the business community that codes of ethics are *prima facie* ethical in terms of their content and use (Schwartz, 2002, p. 28). When is a code of ethics considered

ethical? Schwartz (2002, p. 29) suggested that an initial set of universal moral standards is required by which all corporate codes of ethics can be evaluated (see text box for a list of these 'universal moral standards'). These moral standards from Schwartz (2002) may or may not be universal and applicable across cultures, borders and professions and they may not be an exhaustive list of those elements that people consider to be ethical. Fisher for example, (2001, p. 146) wrote that integrity and loyalty, either explicitly or by implication should figure strongly in organizational codes of ethics (neither of which are mentioned specifically in the Schwartz 'universal moral standards' listed above). Fisher explained that integrity is normally stated to have several components including soundness of moral judgment, honesty and a holistic unity of thought and action (ibid). Loyalty is more simply defined as faithfulness (Fisher, 2001, p. 146). However, how faithful should an employee be to an organization's code of ethics when it conflicts with their own sense of right and wrong? Brinkmann and Ims (2003, p. 267) looked at codes of ethics through a virtue ethics perspective and put forth the idea that individuals should be more than simply loyal to a code and should not stick to the code whenever this would be too narrow (p. 267). In the case of virtue ethics, Brinkmann and Ims (2003) suggested that prejudice towards codes arises from sound skepticism towards rules and regulations: good or virtuous people do not necessarily need a code, while bad people tend to twist code rules

rather than follow them loyally (Brinkmann & Ims, 2003, p. 267). Virtue ethics and the use of a person's own sense of morality is a theme that is revealed in the data gathered for this thesis and will be discussed in more detail in Chapter IV (p. 129).

To develop codes of ethics, Brinkmann and Ims (2003) proposed a Habermasian approach based on the notion of discourse ethics. They suggested that the primary issue and evaluation criterion of ethicalness of codes is whether all parties affected can articulate their needs in an undistorted communication context (Brinkmann & Ims, 2003, p. 266). Through an ideal discourse, the participants form and discover their interests and the norms that they will accept rationally as binding (ibid). Code ethicalness requires that the code is a product of and revisable by a fair and open dialogue among all parties affected and that the code furthers a communicative rather than a strategic interaction climate (Brinkmann & Ims, 2003, p. 266). Schwartz is somewhat consistent with the notion of addressing the needs of stakeholders in code documents and suggested that companies are required to address their obligations to their stakeholders in the code of ethics (Schwartz, 2002, p. 30). Schwartz added that in the creation of a code, organizations should have a moral obligation to involve employees (Schwartz, 2002, p. 32).

Involving internal and external stakeholders in code creation could be an important component to their successful use. Hofstede (1980) described the case of a Dutch company that developed a 'Social Charter' which expressed the social responsibility of the organization to customers, employees and shareholders but found that by the time it adopted the document, its values had not kept pace with the social consciousness of Dutch society (Hofstede, 1980, p. 36-37). The company became the target of a pressure group and capitulated to its demands to eliminate the use of Angola coffee in its products. The case is an example of the importance of an organization ensuring its values and principles are sensitive to those of its stakeholders.

Based on the information provided here, it seems that codes of ethics, whether they are intended for use in an organization or to guide the actions of a profession, they should not only be responsive to

the members but also be sensitive to the needs of those the organization or profession may impact or serve. It also seems reasonable that they should be developed through an inclusive process that solicits the opinions of stakeholders. This may be relevant to disclosure communication. If for example, the issue of communication or disclosure is discussed among stakeholders when developing or revising a code of ethics, a mutual understanding could be created between the organization and its publics for how information will be shared.

If a company or a profession conducts a process to develop a code of ethics, there are a number of points identified in the literature to ensure they are as inclusive as possible in their creation and in their application. The literature appears to be quite consistent on the notion of communicating the codes well to ensure adoption and use and to make certain that the code is relevant to those that they are meant to help such as employees and stakeholders.

Kinchin mentioned that writing up a code of ethics, putting it in a frame and hanging it on a wall is only half of the job and that managers must ensure that staff undertake regular training in the code of ethics and must encourage the kind of behaviour that the code espouses by being seen to be making ethical decisions themselves (Kinchin, 2007, p. 118). Schwartz would support this and suggested that companies have a moral obligation to distribute or make available to all employees their codes of conduct in addition to providing sufficient training, support and reinforcement to ensure employees understand the code and how it applies to their work (Schwartz, 2002, p. 34). Kaye wrote that codes can be effective educational tools for staff and can contribute to the shaping and maintenance of the corporate culture of the company (Kaye, 1996, p.5). Dobson commented that an organizational culture that recognizes and nurtures the drive for bonding through the implementation of an ethics code, from top management on down, is a successful one and that those guided by the code will be successful professionals (Dobson, 2005, p. 64).

This last point above from Dobson (2005) is an interesting one. He posited the idea that following an organizational code will lead to someone becoming a successful professional. It is not certain how

following an organizational ethical code will do this. It may be true that someone following an organization's ethical code will be successful from the perspective of the organization but there may be discrepancies between an organization's code of ethics and a professional or personal code. There is no advice offered in the Dobson piece to resolve these issues if they arise. The implications for disclosure could be that a professional organization's code may be quite specific about information sharing whereas an organization's code of ethics may either lack specific mention of a position on disclosure or put forth a principle that perhaps does not lead to full and open disclosure on every issue. How are discrepancies between professional, organizational and perhaps personal codes of ethics resolved?

Kinchin (2007) suggested a code must be composed in a language that the individual can relate to and more importantly can apply to day-to-day decision-making (p. 113). This would mean that the code of ethics would have to be developed with input from employees and others and be open to review on a fairly regular basis possibly dependent on the rate of staff turnover for example. Kinchin mentioned that through 'procedural fairness', which includes due process, impartiality, consistency, and a right to reply, codes provide a framework that can be followed for 'ethical' behaviour. Kinchin also offered that a code of ethics has the potential to be an extremely effective tool in ensuring accountabilities in decision-making but this effectiveness is degraded if individual human traits and values are not taken into account (Kinchin, 2007, p. 118). It is the human element of the code which refers to the internalization of the code of ethics by the individual decision-maker that will ensure accountability to its use (Kinchin, 2007, p. 118). Kinchin's idea of ensuring codes of ethics are sensitive to the needs of an individual may be consistent with Aristotle's virtue theory. Heichelbech (2003, p. 45) explained virtue theory in terms of a person's character including their actions and how someone is predisposed to respond to situations regardless of regulations or rules. Virtue theory and other moral frameworks and their relevance to disclosure decision-making are discussed in more detail in Chapter V (pp. 187-191) but for the purposes of this Literature Review, it is important to note at this point that there is evidence that individuals in an organization should participate in the

development of its code of ethics. But what if a situation arises where the organizational and professional codes of ethics do not offer guidance?

In a qualitative study that Fisher (2001) conducted on 45 financial and human resources managers, he found that respondents were aware of their professions' codes of ethics but were hazy about their content (p. 146). The interviewees in his study failed to refer to codes partly because they thought that the publication of *'banal and unnecessary codes impugned their integrity and undervalued their experience'* (Fisher, 2001, p. 146). This thought is actually shared by a few focus group participants who are referred to later in this thesis. When participants identified in this thesis were asked about their use of codes of ethics there was a mixed reaction. A few of the focus group attendees in this study, mentioned that they did not look at them and instead preferred to work through ethical decision-making with their senior teams while another comment indicated that codes of ethics may provide a helpful guide to make ethical decisions (evidence in Chapter VII, pp. 302-304).

Sherwin (1999) suggested that rather than trying to choose a single theory or moral framework to make a decision in every situation, it may be preferable to view different theoretical perspectives as providing alternative frameworks or templates for different sorts of approaches to problems (Sherwin, 1999, p. 202). Essentially, Sherwin (1999) suggested that there is more than one approach that people can take to make ethical decisions. One moral framework may apply to a specific situation and it may not in another. It might be similarly true that a code of ethics from an organization, association or a person may not provide a single guideline to an ethical decision. It may be the case that a practitioner will have to draw from various sources to be at ease ethically with a decision about disclosure communication.

## **6.2 Codes of Ethics and Public Relations Practice**

In this section, three public relations / communications society's codes of ethics are reviewed including: the International Association of Business Communicators (IABC), which had several members represented in this research, Canadian Public Relations Society (CPRS), which was



chosen based on the Canadian focus of this thesis , and the Public Relations Society of America (PRSA), which was added due to some interesting criticism that appeared in the literature around the time the association released its latest version of its code of ethics. The codes of ethics for each of these organizations were found on their respective websites. Please see Appendix C, for copies of the codes of ethics from the three groups listed above.

In the table below, excerpts from the societies' full codes of ethics have been provided. The selected points in the table below represent the specific references each of the society's codes has made to 'disclosure', 'transparency' or a stated commitment to share information with stakeholders.

Organization	Statement on Disclosure in Code of Ethics
Canadian Public Relations Society	<p><i>2. A member shall deal fairly and honestly with the communications media and the public.</i></p> <p><i>3. A member shall practice the highest standards of honesty, accuracy, integrity and truth, and shall not knowingly disseminate false or misleading information.</i></p> <p><i>5. Members shall be prepared to disclose the names of their employers or clients for whom public communications are made and refrain from associating themselves with anyone who would not respect such a policy.</i></p>
International Association of Business Communicators	<p><i>1. Professional communicators uphold the credibility and dignity of their profession for practicing honest, candid and timely communication and by fostering the free flow of essential information in accord with the public interest.</i></p> <p><i>4. Professional communicators are sensitive to cultural values and beliefs and engage in fair and balanced communication activities that foster and encourage mutual understanding.</i></p> <p><i>8. Professional communicators protect confidential information and at the same time comply with all legal requirements for the disclosure of information affecting the welfare of others.</i></p>
Public Relations Society of America	<p><i>Free Flow of Information – Core Principle Protecting and advancing the free flow of accurate and truthful information is essential to serving the public interest and contributing to informed decision making in a democratic society.</i></p> <p><i>Disclosure of Information – Core Principle Open communication fosters informed decision making in a democratic society,</i></p>

In the CPRS code of ethics the only specific mention of 'disclosure' is the practitioner's obligation to provide the names of their employers or clients *for whom public communication is made*. The Society does not mention in its code why this is important but it may have to do with declaring any conflicts of interest in representing clients who may be competitors for example. The personal obligation for a practitioner to avoid a conflict of interest by disclosing their clients seems to make sense but it is not really consistent with the intention of disclosure in this thesis, which is helping an organization

improve its level of transparency with the public. Articles two and three of the CPRS code of ethics states that members shall deal *'fairly and honestly'* with the communications media and the public and that the *'highest standards of honesty, accuracy and truth'* shall be practiced. In the more detailed description of these clauses, they appear to deal with ensuring practitioners do not provide gifts to unduly influence media or members of the public, rather than improving the transparency of their organizations or clients with the public. It may have been more helpful to mention something about providing information in a timely and concise manner to ensure stakeholders and the public can make an informed decision about the information being provided.

Unfortunately, the CPRS code of ethics does not seem to provide much direction for practitioners who are encountering situations where an ethical decision has to be made about disclosing organizational information. There are mentions of being fair and honest and maintaining 'integrity' and 'truth' and to avoid disseminating false information but while these mentions may be helpful in determining messaging around disclosures, they do not address issues where a practitioner may experience conflict between what an organization wants to do and what its public may need to make a decision about how a disclosure situation impacts their lives.

In the IABC Code of Ethics for Professional Communicators, articles 1, 4 and 8 seem to be the most relevant to the issue of disclosure decision-making. It is mentioned in the first article that communicators should practice *'...honest, candid and timely communication and by fostering the free flow of essential information in accord with the public interest.'* Article 4 has reference to communicators engaging in *'fair and balanced communication activities that foster and encourage mutual understanding'*. Article 8 includes the word 'disclosure' but it is mentioned in the context of the legal requirements an organization or person may have to provide information to the public. The language used in the IABC code is helpful in terms of making an attempt to ensure the practitioner is communicating with the public interest in mind and is trying to foster a 'free flow' of 'essential' information between the organization and public. This is consistent with the intention of the

disclosure model in this thesis that helps guide the practitioner to work in the interests of the organization and its stakeholders when making decisions about disclosure communication.

There are two areas of the Public Relations Society of America Member Code of Ethics that relate to disclosure communication relevant to this thesis. The first is a 'core principle' about the 'free flow of information' that is in the 'public interest' that contributes to informed decision-making and the second is similar but mentions the word 'disclosure' specifically in the context of open communication to inform decision-making. These principles seem to be consistent with the intention of the model in this thesis that prompts practitioners, through a series of questions, to consider the interests of their stakeholders when communicating disclosure information. The model will need to undergo extensive testing to determine if in actual practice it does in fact help practitioners consider the needs of the public but the intention is to consider the information needs of stakeholders in addition to the strategic needs of the organization (for example reputation management) when disclosing information.

Parkinson (2001) was quite critical of the PRSA Member Code of Ethics and he suggested that authors were more concerned about the perception of external publics than they were concerned about admonishing practitioners to meet legitimate professional obligations to their clients (Parkinson, 2001, p. 29). He wrote that there are several reasons a requirement to act in the public interest is not properly part of a code of professional ethics (Parkinson, 2001, p. 30). His main claim was that practitioners are not aware of the public interest and '*...when we attempt to act in the public interest, since there cannot be adequate data for any empirical identification of the public interest, we tend to act emotionally rather than logically.*' (Parkinson, 2001, p. 30) He also wrote:

*'If public relations is to become a profession we must find some way to comfortably accept our roles as advocates. To do this we must develop faith in the decisions of the publics whose opinions we seek to influence. As a first step we must accept the reality that we cannot know what is in the public interest, rather we must present information to the publics on behalf of our clients and let those publics decide for themselves what is and what is not in their interest'* (Parkinson, 2001, p. 31).

It is unclear from the article why Parkinson stated that determining the public interest is impossible to achieve. By identifying and defining publics through a process of segmentation and then working to build relationships with them, why would it be impossible for public relations practitioners, or anyone else, to determine what information might be in the interests of publics? It may be impossible to determine or even meet the information needs of every individual in a public but it may not be unreasonable for public relations practitioners and their organizations to attempt, through consultation with audiences, to provide information that publics will at least find useful and help them make a decision about a situation.

In the three codes of ethics from communications and public relations organizations that were examined here, they all made mention of upholding the truth in communications. Both IABC and PRSA were more specific in their mention of creating a 'free-flow' of information that considers the communication needs of stakeholders. As mentioned previously, communicators who participated in research for this thesis were mixed in their opinion of whether or not they referred to codes of ethics in their decision-making about disclosure. As Brinkmann and Ims (2003, p. 267) suggested, people may want to avoid sticking to a single code of ethics if it is too narrow for the situation. Professional societies and organizations may spend a considerable amount of time consulting with stakeholders and drafting and redrafting their codes of ethics, but it is conceivable that they may not be exhaustive documents that offer guidelines for every situation. It may be that codes of ethics provide a starting point for discussions about ethical decision-making for disclosures and that achieving strict adherence to one or more codes may not be possible. In the next section of the Literature Review, research will be examined on how organizations disclose information, which will provide greater insight into how disclosure decisions are made.

## **7.0 HOW DO ORGANIZATIONS DISCLOSE INFORMATION?**

This section focuses on literature from public relations and communications (Meisenbach 2006, Arpan & Roskos-Ewoldsen 2005, Lyon & Cameron 2004, Pratt 2004, King 2003, Coombs & Holladay

2002) business ethics (Campbell & Beck 2004) business, management and finance (Kaufman, Kesner & Hazen 1994, Lev 1992) and healthcare (Liebman & Hyman, 2004) to examine how organizations disclose information and how they make decisions about whether or not to provide information to the public. The question of what full disclosure means to an organization and whether or not this approach is an effective strategy to communicate with publics is explored as well as how organizations should segment audiences when presented with a situation that should be disclosed. In the final section, the question of how organizations can ensure their responses are meeting the needs of stakeholders is examined through a case that employed an ethical framework for managing disclosures.

### **7.1 Strategic Disclosure of Information**

When organizations are presented with a situation that should be disclosed to its publics how do they communicate information and what factors determine their strategy? The public relations, business and financial literature presents a couple of themes that basically can be summed up as either the organization deals directly or indirectly with the situation through a full, partial or non disclosure of the information to its audiences.

In what might be one of the more proactive forms of disclosure, Arpan and Roskos-Ewoldsen (2005) suggested a full-disclosure approach they called 'stealing thunder', which involves communicating potentially negative information before it is acquired or released by another entity (p. 426). Based in the legal field, trial attorneys have used this strategy for years when representing a defendant whose weakness is apparent and known to an opponent. In mock-jury trials, those who disclosed information about themselves received more favourable verdicts than those who did not (Arpan & Roskos-Ewoldsen, 2005, p. 426). In the context of disclosing information, stealing thunder involves the admission of a weakness before it can be announced by the news media or another interested party (Arpan & Roskos-Ewoldsen, 2005, p. 427) thus giving the organization an element of control over the messaging and timing of releasing information.

To test a hypothesis that releasing information before it can be leaked will earn an organization more credibility with the public and media than if they held onto it, the authors sampled 134 undergraduate students who were provided with a mock crisis situation (Arpan & Roskos-Ewoldsen, 2005, p. 427). In the study, the situation is disclosed by the company and in another scenario by the Centers for Disease Control (Arpan & Roskos-Ewoldsen, 2005 p. 429). The researchers found that when the organization disclosed the information the subjects reported the crisis was less severe and they felt the company acted more responsibly than if the situation was disclosed by a third party. The study concludes that stealing thunder is an ethical and effective communication strategy for organizations that need to disclose information publicly (Arpan & Roskos-Ewoldsen, 2005, p. 430-431).

Arpan and Roskos-Ewoldsen (2005) tested the stealing thunder theory on a collection of undergraduate students who were asked to respond to a mock-situation and the results may have been different if the respondents had real life experience with the disclosure and had been exposed to more intense media and public scrutiny that would undoubtedly accompany such a situation. The results were interesting but the study did not go far enough in terms of providing communications professionals with advice or a set of criteria that would guide practitioners about when to employ the stealing thunder strategy and when full disclosure of information may not be the best option. There is also no discussion of how organizations should segment or target specific publics through their communication efforts to manage the situation.

Using a similar study design to Arpan and Roskos-Ewoldsen (2005), Lyon and Cameron (2004) subjected 80 participants to fictitious news stories to test the response to a disclosure situation (p. 214). Full disclosure was provided in the study but the variables tested audience reaction to companies with good and bad reputations that respond to a situation with either a defensive posture or an apology (Lyon & Cameron, 2004, p. 214). The study attempted to understand why people feel less favourable toward companies with a bad reputation who employed an *apologia* response compared to those who have good reputations and are able to achieve benefit of the doubt from the public (Lyon & Cameron, 2004, p. 214). Lyon and Cameron (2004) found that participants in the

study preferred companies with a good reputation compared to those with bad reputations. Participants preferred management styles, ethical standards, and were more likely to invest in or buy products from companies with good reputations (Lyon & Cameron, 2004, p. 226). Research participants equated an *apologia* response with a greater perception of the company as being ethical (Lyon & Cameron, 2004, p. 227). They also found participants rated the company that apologized as more intelligent, virtuous, and sincere than those that took a defensive posture (Lyon & Cameron, 2004, p. 228).

As with the Arpan and Roskos-Ewoldsen (2005) work, the Lyon and Cameron (2004) study has some limitations. The sample in the Lyon and Cameron (2004) study was a collection of undergraduate students and members of the community. This sample may not be representative of the broader population. However, based on these works, it would seem that when organizations are confronted with an ethical situation that needs to be clarified or discussed publicly, the best response strategy is to disclose it before the information can be provided by someone else. These approaches represent disclosure of the incidents as the best course of action but the studies do not provide an account of when to employ the strategies and when it may not be in the organization's best interest to communicate directly about a situation.

*Apologia* strategies as mentioned in the Lyon and Cameron (2004) study have relevance for this thesis in terms of how to disclose information. According to Hearit (2001, p. 502), an *apologia* strategy is not an apology per se but rather, *apologia* is a response to criticism that seeks to present a compelling competing account of organizational actions. Corporate *apologia* are a response to ethical charges in which organizations have as their primary motive the defense of their reputations and to which they offer discourse in self-defense that explains, denies or justifies their actions (Hearit, 2001, p. 502). Hearit suggested that there are four contexts likely to result in an apologetic response (Hearit, 2001, p. 502-503):

- Accidents describe those one-time events that typically occur with little warning and count innocents as their victims.

- Scandals and illegalities characterizes the context that surrounds the disclosure that a company makes when it intentionally engages in unethical or illegal acts that bring damage to its reputation and often result in social sanction
- Product safety incidents that tend to emerge over time as evidence from variable sources begins to appear
- Social irresponsibility or those situations where a company violates current social and community norms.

Unlike the Arpan and Roskos-Ewoldsen (2005) research on stealing thunder, the Lyon and Cameron (2004) study and Hearit (2001, p. 502-503) use of *apologia* seems to be used as a reactive strategy rather than a proactive measure from the organization to address the situation. In public relations and communications literature (Marsh 2006, Hearita & Brown 2004, and Coombs 2004) *apologia* appears to be mostly applied when the issue is already in the public domain and the organization is compelled to respond. There is an opportunity for communications research to examine the use of *apologia* and the stealing thunder approach when an organization is presented with a disclosure situation that it chooses to make public rather responding to an issue that is already or about to be revealed publicly.

Following an *apologia* strategy ensures an organization offers *mea culpa* or admission of guilt, which is one possible approach to managing a disclosure but Campbell and Beck (2004) looked at the idea of whether or not organizations directly or indirectly addressed charges levied against them publicly. They examined eight organizations that had a public allegation of an ethical nature made against them (Campbell & Beck, 2004, p. 100). In looking at their subjects' corporate literature and web sites they found that companies either deal directly with the allegation or indirectly by addressing the broader issue and not the specific charge (Campbell & Beck, 2004, p. 104). For example, the study examined the Dutch energy company Shell and how it managed environmental disclosures and how the company addressed the issue directly and thoroughly and was cited as an effective example of managing the situation (Campbell & Beck, 2004, p. 107). In other cases such as McDonald's and its ethical treatment of animals, specific allegations were not addressed directly but the issues were discussed more broadly on the corporate web sites (Campbell & Beck, 2004, p. 108).



From this small study, Campbell and Beck (2004) provided evidence that it is best for companies to deal directly with a specific allegation made against the company rather than avoiding responding to detailed charges and choosing instead to address the broader issue. This seems especially relevant when the organization is responsible for the transgression or is the only one implicated in the wrongdoing. Building on the Arpan and Roskos-Ewoldsen (2005) study and Lyon and Cameron (2004), a suitable response for a specific accusation against a company is for the organization to disclose whatever information it has about the situation to the public and eliminate the opportunity for another party to bring it forward and perhaps distort the message.

Liebman and Hyman (2004) presented an approach for healthcare workers to provide details to patients when errors occur. The parallel between an organization disclosing information to its publics and a clinician providing sensitive and potentially damaging information to a patient is a relevant comparison. Both the organization and clinician have sensitive information to communicate and if it is not managed properly, both could face serious and costly consequences. Interestingly, the authors suggested it is not the quality of medical care or negligent treatment that usually leads to litigation but rather ineffective communication including the perception that the physician was not completely honest, the inability of family members or patients to get anyone to tell them what happened and a sense that the physician was not listening to their concerns (Liebman & Hyman, 2004, p. 22). They recommended that 'Disclosure Conversations' occur between clinician and patient when an adverse event takes place. Liebman and Hyman (2004) advised that disclosure conversations should follow a process that is responsive to the needs of the patient to have accurate and timely information, include an apology, provide assurances that steps have been taken to prevent others from being similarly harmed, and offer fair compensation where appropriate (p. 22).

One of the pieces missing from the studies is an indication of how much information is too much information and is it possible to disclose too much? Kaufman, Kesner, and Hazen (1994) described full disclosure during a crisis as conveying all information about the event in a complete and timely manner and ensuring questions are answered without delay and when an accurate response cannot

be provided immediately the organization should provide one as soon as possible (p. 30). An assumption Kaufman, Kesner and Hazen (1994) made about the full disclosure process is that all information will eventually be revealed and they recommended that it is best if communication about the situation comes from the organization rather than someone else (p. 30). They suggested that in addition to avoiding adversarial relationships between an organization and its constituents, full and immediate disclosure may help the public forgive the company for its role in the crisis (Kaufman, Kesner, & Hazen, 1994, p. 30).

Kaufman, Kesner, and Hazen (1994) admitted that full disclosure is not a *panacea* for all crisis situations and they propose a number of weaknesses in the strategy. The underlying assumption that all information will come out in due course may not be entirely true. They suggested that some organizations facing a crisis can reveal information that might shock its constituents such as the now infamous case of Ford Motor Company's handling of the Pinto automobile issue in the 1970s (Kaufman, Kesner, & Hazen, 1994, p. 33). In the Ford Pinto case, a study found that the location of the gas tank could cause the automobile to be engulfed in flames if the car was involved in a rear-end collision. Ford revealed that it calculated the cost benefit analysis of an approximation for the cost of consumer deaths at \$200K per person and determined that this outweighed the legal liability. Ford was vilified for this disregard of human life despite the fact that the study was mandated and funded by the United States National Highway Traffic Safety Administration (Kaufman, Kesner, & Hazen, 1994, p. 33). Regardless, Ford's decision to act on the results of the study casted a heavy ethical cloud over the company but the researchers raised an important point about how much information is too much information. In disclosure situations, companies may be able to define how much is too much information by conducting some research to determine the needs of their audiences for information and gauge their messaging strategies accordingly. Determining how much information to disclose is a theme that was raised in the data collection for this thesis which is discussed in Chapter IV (p. 144).

In the finance literature, Lev (1992) advised companies to conduct a cost benefit analysis of a disclosure strategy to consider the effects of communication on all of the organization's major stakeholders and constituencies including government and regulatory agencies (Lev, 1992, p. 16). The motivations expressed for disclosure in the Lev (1992) article are clearly directed at increasing the company's value among investors. Companies are however in the business of increasing their value so although the rationale for Lev's (1992, p. 19) recommendation to provide an even flow of credible information, as opposed to infrequent releases of highly surprising news, is geared toward generating profit, the notion of communicating frequently with an organization's stakeholders is a good one. The question though that Lev does not address is what to do with negative news and how it should be disclosed to publics, including investors.

In contrast to the notion of a constant flow of good news that Lev (1992) advised in the management and finance world, public relations author, Pratt (2004) examined how companies develop key messages and he presented the idea that the value of communication from organizations tended to be downplayed by receivers if they perceive the information as an outpouring of self-serving good news (p. 19). This notion may provide guidance for the content of Lev's (1992) proposal to communicate often with stakeholders rather than infrequent releases of information. While the frequency of communication is important, as Lev (1992) suggested, the content of the message must also avoid self-serving disclosures as Pratt (2004) mentioned. Communication presenting both sides of an issue may turn the tide of discontent among hostile publics and credible messaging that recognizes the full breadth of an issue can engender confidence among organizational publics (Pratt, 2004, p.19).

Based on the information presented thus far from Pratt (2004) and Lev (1992), communicating often with stakeholders and providing realistic and truthful messaging may help an organization instill goodwill among its publics. Arpan and Roskos-Ewoldsen (2005) provided advice on the concept of timing a disclosure to be made before another organization can leak the information and Lyon and Cameron (2004) and Campbell and Beck (2004) suggested that dealing directly with allegations and

avoiding a defensive posture is more effective than side-stepping the charges. These articles provided insight into the strategic approaches used to disclose information but they fall short of answering the question of when these options should be triggered. Kaufman, Kesner, and Hazen (1994) attempted to provide an answer to when organizations should disclose information, by posing five questions practitioners can ask before deciding to communicate publicly, which are represented in the table below (Kaufman, Kesner, & Hazen, 1994, pp. 35-37).

- |   |
|---|
| <ol style="list-style-type: none"><li>1. <b>Could non-disclosure be fatal or lead to further injury?</b> If yes, then full disclosure must take place as soon as possible. If the crisis can be regarded as a “time-bomb” then disclosure must be made quickly and accurately to remove the danger.</li><li>2. <b>Is your organization the culprit or the victim?</b> An organization facing a crisis of its own doing versus one where it is a victim is in a different position. Victims can disclose more openly than an organization that has responsibility for the situation.</li><li>3. <b>Are fictions surrounding the crisis worse than the facts?</b> Rumours about a crisis can be more damaging than the facts. A full disclosure can alleviate a situation if the facts are less serious than the rumours.</li><li>4. <b>Can your organization afford to respond after the crisis?</b> Large corporations are able to manage the costs of corrective measures whereas most companies cannot so they continue to operate.</li><li>5. <b>Can your organization afford not to respond to the crisis?</b> There are costs associated with not responding and reassuring the public and clearing the company’s name could be essential to long-term survival.</li></ol> |
|---|

These five questions provide some direction for professionals to consider in preparation for executing a disclosure strategy. It would have been helpful for Kaufman, Kesner and Hazen (1994) to subject these criteria to academic rigour however and have them validated with empirical data. From their article, it appeared the questions have been derived through the authors’ collective experience, which is a valid opinion but the questions could benefit from more intensive investigation. Another shortcoming of the five questions might be the lack of consideration for stakeholders in determining the response strategy. Apart from the first question, which asks if not-disclosing the information could be fatal, the questions seemed to be organization-centric and do not provide the organization with any sense of how to prioritize publics. A more thorough examination of the questions, through a vigorous research effort, could reveal other criteria that are relevant to the audiences and can help a company determine its response strategy.

King (2006) and Coombs and Holladay (2002) offered further evidence that could help organizations determine their disclosure strategies. Both studies look at responses to crises rather than an organization choosing to disclose information but the principles they present could inform a communication plan that would guide the ultimate decision to release details of a situation.

In a case study that examined the response of Brown and Williamson tobacco company to an incident of a former employee blowing the whistle on the organization's alleged attempts to stifle the creation of a 'healthier cigarette', King (2006) recommended that senior officials who respond to allegations of wrongdoing should consider the characteristics of the situation and measure their response accordingly to avoid an overreaction or appearing defensive (King, 2006, p. 135). The author suggested that senior officials of an organization should use caution in adopting a defensive strategy in response to ensure they are not perceived publicly to be less concerned with victims and more focused on the long-term financial impact of the wrongdoing (King, 2006, p. 135).

Consistent with the advice of King (2006), Coombs and Holladay (2002, p. 165) presented a situational crisis communication theory that matches the organization's response to the level of responsibility attributed to the event. They suggested that managers should select a crisis response strategy that most appropriately addresses the potential for reputational damage that a crisis might inflict on an organization (Coombs, Holladay, 2002, p. 166). The stronger the potential for reputational damage to an organization, the more the crisis response strategy must try to accommodate the victims (ibid). Similar to what Liebman and Hyman (2004) suggested earlier for clinicians to disclose medical errors to patients, Coombs and Holladay (2002) advised organizations that are responding to adverse incidents, to assess the organizational level of crisis responsibility including the severity of the incident and then communicate corrective action to audiences to ensure the incident does not happen again and when responsibility for the issue rests with the company, the authors proposed the organization offer an apology (Coombs & Holladay, 2002, p. 167).

These studies and those presented earlier in this section, offer helpful information about how an organization should disclose details about an issue that would generate public attention. What the studies seem to be missing however is the presentation of a process model to assist in disclosure decision-making that considers the needs of an organization's public for information. The information needs of the public and stakeholders in a disclosure situation are only given palliative interest in the articles covered here. A closer look at how to reach audiences in these situations might help

organizations develop precise methods of communicating with audiences and ensure that the messages from the organization are meeting the needs of intended publics. A discussion of defining and communicating with publics in the context of disclosure situations is examined next.

## **7.2 How Do Organizations Define Publics in Disclosure Situations?**

When an organization is presented with an issue and has decided that information about the situation must be communicated, a logical next step is to determine who needs to receive the messages. Defining audiences may help tailor organizational messaging to the specific needs of different stakeholders and it might ensure that organizational information about the disclosure is received. Having a specified list of stakeholders may also help the organization reach out to various publics to create a dialogue about the situation.

In the 1992 *Excellence in Public Relations and Communications Management* study, Grunig described the process of segmentation as simply: dividing a population, market or audience into groups of whose members are more like each other than members of other segments (p. 129). Moving beyond separating groups into publics, Grunig and Hunt (1984) proposed situational theory, which contends that communication behaviours of publics can be understood by measuring how groups perceive situations in which they are affected by organizational consequences (Grunig & Hunt, 1984, p. 148). The theory provides three variables to enable organizations to map their stakeholders and prioritize them by their ability to first recognize a problem or issue they may have with the company, second, recognize the level of constraint they have to act against the situation, and third, understand the level of involvement the public has with the issue (Grunig & Hunt 1984).

As mentioned earlier in this chapter (p. 27), a criticism of the Grunig and Hunt situational theory is the reactive nature of the approach and its focus on active publics. Jahansoozi (2006, p. 65) mentioned that Grunig's approach to identifying and rank ordering publics based on their three criteria of problem recognition, constraint to act and level of involvement, fixates organizations on seeking compromises with active groups at the expense of working to build strategic relationships

with non-active publics. Placing attention solely on publics that are targeting the organization can be a missed opportunity to create allies and partnerships in the environment to help the organization achieve its goals and potentially minimize the tyranny of a vocal minority that can be found in single-issue publics. Practical application of situational theory may help an organization in the short-term at dealing with an immediate issue but its long term and strategic benefits seems lacking at identifying groups who could be supportive of the organization and its mandate but who have not yet been cultivated through public relations efforts.

To further examine the use of situational theory and its relevance to managing publics, Berkowitz and Turnmire (1994, p. 105) attempted to use the process to segment audiences based on an emerging issue by asking publics about their cognitions and attitudes rather than sorting groups by demographic data such as age and gender (Berkowitz & Turnmire, 1994, p. 109). To test this notion, the authors conducted a study to determine the potential 'issue groups' that would form around a hypothetical proposal of foreign investment in a small-mid-western community in the United States. They surveyed 60 people about the fictional scheme and formulated issue groups about whether people were in favor of, opposed to or indifferent about the concept of foreign investment (Berkowitz & Turnmire, 1994, p. 111).

Based on their study, Berkowitz and Turnmire (1994) concluded that segmenting on the grounds of issue groupings can detect public opinion before it turns into active organized opposition, enabling an organization to take a proactive approach to managing the situation (p. 122). One of the key points missing from the study and its practical application is a discussion of how issue defined publics can be identified into groups that the organization can reach out to with information and possibly create a dialogue about the issue. While this method provides a descriptive analysis of the issues that may exist in an environment, this study does not provide any indication of how to target or identify publics that might galvanize around an issue. Despite trying to use situational theory to rank groups, the researchers prioritized a list of issues and how people might form around them. The Berkowitz and Turnmire (1994) study seemed to accurately describe a collection of target markets

that can be reached through mass advertising campaigns rather than defining actual publics that an organization can contact to create some form of dialogue.

In 1992, Hamilton tested the Grunig and Hunt (1984) situational theory during a gubernatorial election in the United States. He conducted a telephone survey with 226 randomly selected voters to identify three levels of communication activity and interest in the race (Hamilton, 1992, p. 126-127). Hamilton concluded that situational theory can be a predictor of communication activity among publics. These results provide some confirmation that Grunig's (1992, p. 125) classification of groups into non-publics, latent, aware, and active publics has merit and can be used to help organizations prioritize their efforts in managing relationships with stakeholder groups but determining level of interest in an election through a random sample of eligible voters does not necessarily provide the campaign with sufficient map of stakeholders and publics that can be approached with information from the campaign and potentially influenced to provide voter support for a candidate. The Berkowitz and Turnmire (1994) and Hamilton (1992) quantitative studies both failed to gain a qualitative understanding of the needs and motivations of specific publics. Instead, their studies reflect the results of public opinion polling which is important to understand how audiences might respond to an issue but it only represents a preliminary step in defining a more robust strategy that can define specific stakeholders and audiences who can be approached for support of an organization. Specifically identifying groups and gaining the qualitative knowledge of their attitudes and opinions may have helped these research efforts conclude more precisely what a public relations strategy would look like for managing an issue or provide some insight of how to disclose information.

As stand-alone approaches, the theories and results discussed above have short comings for use in disclosure situations but the notion of segmenting and providing some level of priority to audiences may make sense in a disclosure. Prioritizing audiences may help the organization execute a controlled communication strategy that informs stakeholders about the disclosure situation in a step-wise manner. This could allow the effective management of the situation and ensure the organization is as prepared as possible to manage the communication concerns of its audiences.



In looking at the concept of symmetrical communications between an organization and its publics as a method of building relationships with publics it is important to realize that there are alternatives to Grunig's (1992) two-way symmetrical model. In Grunig's two-way symmetrical approach to working with publics, the main objective is to reach a mutual understanding or consensus with active publics and this may not always be achievable. For example, Holtzhausen (2000) suggested that the understanding of consensus and symmetry in public relations is unlikely and that seeking consensus implied seeking an unjust settlement in which the most powerful, usually organizations, get their way (Holtzhausen, 2000, p. 106). Through a postmodern position of public relations, Holtzhausen contended that consensus is impossible because the power of an organization and its resources is a barrier to efforts aimed at resolving differences and explaining events (Holtzhausen, 2000, p. 107). She also suggested that consensus represents an unjust outcome because a resolution that satisfies both parties is impossible (Holtzhausen, 2000, p. 107). Heath's (2001) rhetorical view of public relations and symmetrical communications, organizations and publics engage in dialogue to co-create or co-define meaning through the rhetorical processes of statement and counterstatement. In Heath's (2001) rhetorical enactment theory, one side of the debate, organization or public, wins because its arguments are more compelling. This view of symmetry assumes each public has an equal opportunity to speak and be heard but does not presume that all points of view are equal in rhetorical potency and through persuasion and counter-persuasion, it is recognized that some ideas win and others lose (Heath, 2001, p. 35). The notion that Heath (2001) put forward of addressing active publics without the explicit intent of both sides achieving some form of agreement or compromise may be more realistic in practical application than Grunig's (1992) normative approach to two-way symmetrical communication. Even though Heath's (2001) assumption that there is a level playing field may not be accurate, the rhetorical approach importantly recognizes that there is inequity among arguments.

Thus far, the literature has not revealed what, if any, value audiences place on various organizational communication activities. To gain a better understanding of the information needs of various publics

and to propose an ethical model for disclosing information, Meisenbach (2006) explored the practicality of Habermas's concept of discourse ethics in a case that examined the American Red Cross and its establishment of a "Liberty Fund" following the terrorist attacks on the United States in September 2001. The case details the difficulty the American Red Cross had in making ethical decisions about the disbursement of the dollars raised and managing public expectation for how the fund would be allocated. Confusion swirled around whether or not the funds would be used for the victims of 9/11 exclusively or for future victims of terrorist attacks.

In using Habermasian discourse ethics, Meisenbach (2006, p. 40) suggested that the approach provides an inter-subjective procedure for developing norms of behaviour through reasoned public communication. Meisenbach (2006 p. 40) suggested that the Habermas theory provided us with the notion that through competent speakers, speech acts raise the validity of claims from audiences to truth, rightness and sincerity and that these claims can be challenged, rejected and accepted, in discourse by other listeners and speakers.

In examining the American Red Cross case, Meisenbach (2006, p. 46) proposed five steps for enacting discourse ethics:

1. *The speaker generates an utterance that contains claims to normative validity of the situation.*
2. *The speaker determines everyone who is potentially affected by the enactment of a particular claim.*
3. *The utterance is articulated to all parties identified in step two, which can take many forms as long as it reaches the intended audiences and there is ability to respond.*
4. *All parties debate the consequences and their acceptability*
5. *The participants make a judgment about whether or not the claim and its consequences are acceptable to all affected and are therefore deemed ethical*

The major assumption of this process is that an agreement can be reached among publics who may be quite disparate in their opinions and motives toward an issue and it is impossible to accommodate and be inclusive of everyone affected by an issue. The practical application of the Habermasian approach may be difficult given the need to identify everyone potentially impacted by an issue and

reach consensus among them. It is also not clear from the five steps how disagreements between audiences are resolved. Despite some of the challenges with the approach, the idea of involving stakeholders in the resolution of an issue may have some application in the disclosure model that is presented in this thesis, which attempts to encourage organizations to consider the information needs of audiences when making decisions about communication strategy.

In addition to the approach above from Meisenbach (2006), Drew, Nyerges, and Leschire (2004) suggested organizational decisions need to be transparent and integrated into the broader context of the environment to ensure publics understand the impact of an organization's action upon them (p. 1647). The authors proposed that the organization's decision process must be fully laid out and disclosed and all relevant information to the issue should be transparent (Drew, Nyerges, & Leschire, 2004, p. 1647). Henschler (1996 pp. 324-325) argued that organizational transparency means different things at different phases of a decision cycle. During deliberation and discussion of an issue, Henschler suggested that all points for and against different actions should be made available to relevant publics and once the decision has been made, a record of the debate should become public information. In the implementation phase, feedback mechanisms should be transparent and stakeholders should have access to key people in the organization to discuss an issue (Henschler, 1996, pp. 324-325). To further emphasize the point about the involvement of stakeholders in the transparency of organizations, Coombs and Holladay (2009) suggested that transparency should be viewed as a process driven by constituents who should define what information they want from organizations and judge the organization's degree of transparency on its ability to meet their information demands (Coombs & Holladay 2009, p. 5).

What is common to the theories and strategies presented in this section is the recognition of the need to engage publics to help the organization achieve its business and communication goals. There may be some logistical or practical challenges in the approaches that have been described in this section, such as identifying and allowing all publics to voice an opinion and ultimately achieve consensus among their views as in the approach Meisenbach (2006) described but the point is clear

that to be effective in communication, organizations need to find some method of involving stakeholders in developing and executing strategy. This literature has informed the development of the disclosure model that will be presented in this thesis. The model has attempted to include the concept of communicating with the interests of the stakeholder in mind and where possible, ensuring that practitioners work with audiences to develop and implement disclosure strategies.

In the next and final section of the Literature Review Chapter, the research on the role public relations practitioners play in disclosures will be explored.

## **8.0 PUBLIC RELATIONS PRACTITIONERS AND DISCLOSURE DECISION-MAKING**

Two of the research questions that have been posed in this thesis are related to public relations practice and the role communicators play in organizational decision-making and in providing advice to their clients and senior leaders in their organizations about managing disclosures. They are:

- What is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?
- When involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?

Data from the participants in this research relating to these questions are shared in Chapters IV (pp. 169-183) and VII (pp. 296-298) but for the purposes of this Literature Review, research and commentary from primarily the communications field is examined in this section but reference is also made to business management literature to provide the basis for one of the roles communicators may perform in an organization. In addition, the issue of practitioners as ethical watchdogs for their organizations is reviewed with specific mention of whether or not this role is appropriate for the public relations function.

Before exploring the question of what the optimal role is for public relations practitioners in disclosure situations, it might be prudent to determine what is in the literature concerning the most appropriate role for public relations in organizations.

Heath (2001, p. 46) wrote that public relations practitioners enjoy an ideal position to counsel executives on which values fit best with the interests of their markets, stakeholders and publics through relationship building with audiences. He mentioned that by building relationships with audiences, communicators can assist individuals and organizations in making enlightened choices, which can reduce uncertainty among decision-makers by providing them with an understanding of the external environment (Heath, 2001, p. 48). Hofstede (1980) made a similar recommendation resulting from a case study involving a Dutch company that had been pressured by an outside organization and members of society to change its practices. He wrote that corporations may need a modern equivalent of the 'medieval king's court jester', a person on the team with direct access to the highest decision makers, whose institutionalized role is to challenge values and be involved in environmental scanning, in meeting people from different walks of life, in moving outside of the closed inner-circle of the corporate decision makers (Hofstede, 1980, p. 39). The purpose of this role would be to provide the company with a voice that may be representative of those external to the organization or perhaps may be counter to the prevailing culture in the organization.

Aldrich and Herker (1977) put forth a concept that is consistent with Heath (2001) and Hofstede (1980) when they discussed the role of a 'boundary spanner' in an organization. They mentioned that there are two classes of functions performed by boundary roles: information processing and external representation (Aldrich & Herker, 1977, p. 218). They wrote that information from external sources comes into an organization through boundary roles and boundary roles link organizational structure to environmental elements, whether by buffering, moderating, or influencing the environment (Aldrich & Herker, 1977, p. 218). Leifer and Delbecq (1978) argued that the importance of boundary spanning is to ensure that information about environmental contingencies needs to reach organizational

decision makers to ensure the appropriate decisions relevant to environmental conditions and contingencies may be made (Leifer & Delbecq, 1978, p. 40). They mentioned that activities such as reading magazines and newspapers, receiving governmental reports, compiling reports from available data, and interacting with the individuals external to the organization might be considered as organization environment exchange activities (Leifer & Delbecq, 1978, p. 42).

Heath further suggested that as a management function, public relations helps to adapt organizations to people's interests and people's interests to organizations by co-creating meaning and co-managing cultures to achieve mutually beneficial relationships (Heath, 2001, p. 36).

Developing relationships with key audiences and understanding the inner-workings of a public, may help PR practitioners provide advice to an organization on the best approach to disclose information. An existing positive relationship between audience and organization may minimize the potential negative impact on the organization in a controversial or sensitive disclosure situation.

Another view of the role of the public relations practitioner comes from Holtzhausen (2000), who from a postmodern perspective, suggested that the role of PR should be to demystify the organization and its practices and transform it into a more democratic institution for both its internal and external publics (p. 105). Providing stakeholders with an opportunity to affect change in an organization is not without its challenges and Holtzhausen offered that public relations practitioners who seek to implement symmetrical communication practices face a balancing act between management practices, based on modernist principles of command and control, and the postmodern expectations of those people who constitute the organization's multicultural, multiethnic, and gendered internal and external publics (Holtzhausen, 2000, p. 93). Despite practitioners' efforts to implement participatory and ethical practices in organizations, barriers still exist that make adherence to the true spirit of symmetry difficult if not sometimes impossible (Holtzhausen, 2000, p. 93). A postmodern approach toward symmetry would not be to address it at a macro or all encompassing level but to address it in particular situations by focusing on what is right and just in those situations (Holtzhausen, 2000, p. 97). The concept of addressing situations on a case-by-case basis is

compelling for ethical decision-making in a disclosure model. As was demonstrated in the Code of Ethics section of the Literature Review (pp. 64-68), Sherwin, (1999, p. 202) suggested that there may be multiple moral frameworks that can be referred to when making an ethical decision and a 'one-size-fits-all' approach may not be the best approach. In the postmodern perspective of symmetry that Holtzhausen (2000, p. 97) referenced above, 'new meaning' or a new approach to decision-making in disclosure situations may be developed as situations arise for the organization and its stakeholders.

Holtzhausen argued that the role of public relations practitioners is to identify 'tensors' between the organization and internal and external publics and to create situations in which new meaning is produced (Holtzhausen, 2000, p. 107). Lyotard (1993, p. 54, cited in Holtzhausen, 2000, p. 107) described 'tensors' as: '*events that have the potential to involve intermingling or opposing and different forces.*' A disclosure situation may present an organization with an event that has opportunity for differences of opinion between an organization and its publics such as the demand for information from audiences outweighing the willingness of an organization to provide it. The challenge for practitioners will be to straddle the line between what the organization wants to achieve and what the demands of stakeholders may be for information from the organization. If disclosure is going to represent an opportunity to create or maintain symmetry between an organization and its publics, then the organization may have to be open to inviting change to occur as a result of demands from its audiences. Balancing the needs of an organization and its audiences is a research question this thesis will explore in more detail in Chapter IV (p. 153).

Working with publics to create shared meaning and build a better understanding of the organization and its issues is indeed important strategic work of communicators but there are organizational constraints on practitioners that impact the effectiveness of the communications function and could determine the role communications will play in the disclosure of information. Ryan (1987) articulated four areas that affect the ability of the communications department to be valuable to the organization including access to management, the manner in which the department collects information from

publics, the dissemination of information from the department, and finally the public relations mission and whether or not it is a strategic element of the organization (pp. 473-482).

In a 1994 study, Sweep, Cameron, and Weaver-Lariscy (1994), conducted a survey of communications professionals to test Ryan's (1987) theory of organizational restrictions on public relations practice. Interestingly for this study, they found one of the constraints to practice that did not appear in Ryan's (1987) work is the issue of information disclosure. Their results showed that while public relations practitioners are expected to provide candid, timely disclosure of information about the organization to its stakeholders, top management mainly views communication as one-way, and responsible for manipulating a range of publics (Sweep, Cameron, & Weaver-Lariscy, 1994, pp. 326-327), which stands in direct conflict with the Holtzhausen (2000) view, Heath's (2001) rhetorical approach and the ideas Grunig (1992), and Grunig and Hunt (1984) have suggested. The findings of the Sweep, Cameron, and Weaver-Lariscy (1994) suggested that management does not recognize the work public relations practitioners do to build trust with publics (p. 327). Instead, the study suggested that management defines PR as spin rather than a function capable of generating dialogue with publics (p. 327). It is important to note however that the questionnaire, Sweep, Cameron, and Weaver-Lariscy (1994) used in their study was only administered to communicators and the findings reflect a perception of management opinion on behalf of the communicators who responded to the survey and not actual comments of senior leaders in an organization.

Based on the information presented in this section thus far, it would seem that an optimal role for a public relations practitioner in an organization is to provide advice on how to communicate with stakeholders and to provide the management team with intelligence on publics in the environment. The challenge for practitioners may be to balance the needs of the organization, who is their employer, and the interests of the stakeholders with whom the organization may be dependent upon to operate as a business or public service (such as positive relations with customers, government, voters, tax payers, etc.). How does a practitioner balance these needs? How do practitioners provide



advice to their organizations on managing disclosure situations with stakeholders in an ethical manner? Should this be their role?

L'Etang (2003) and Bowen (2008) explored the notion that public relations practitioners should act as the 'ethical guardian' or 'corporate conscience' of an organization. L'Etang (2003) examined the literature on the subject from authors such as Seib and Fitzpatrick who wrote a 1995 book entitled *Public Relations Ethics* that suggested PR practitioners can be the organizational ethical steward due to their role as serving the public interest in the company rather than playing the role of manipulating the environment in the interests of the organization (Seib & Fitzpatrick 1995, cited in L'Etang, 2003). Although Seib and Fitzpatrick suggested PR people can act as an organizational conscience, the concept seems beyond the scope of communications professionals and could be insulting to other members of the organization. What makes the ethics of PR professionals any better than the values and beliefs held by other responsible members of the organization? L'Etang (2003, p. 64) offers similar criticism of the role of PR as ethical custodian, when she argued that communications professionals do not necessarily have the training to lay claim to this role and the reasoning that PR practitioners are responsible for 'reputation management' so they must also be accountable for ensuring 'ethical decision-making' in the organization is not entirely accurate. 'Managing reputation' and 'ethical decision making' are not synonymous terms. One can manage the reputation of an organization without making ethical decisions. Bowen (2008) suggested that although there is a need for organizational ethicists, some PR practitioners are reluctant and not properly trained for this role (p. 290).

If public relations practitioners are ill equipped or improperly trained to be an organization's conscience should they be involved in ethical decision-making? Can communicators take an ethical stand in their organizations and advocate for the stakeholders' 'right-to-know' information? In Chapter IV (p. 179) of this thesis, there are examples of participants in this research who have become advocates for the information needs of their audiences and have experienced varying degrees of success. In the model presented in this thesis, an ethical decision tree is proposed to

ensure the organization is making-decisions in the best interests of stakeholders but to do this, the organization or practitioner will have to have some knowledge of the publics' interest. One way to achieve this might be to ensure the practitioner plays a 'boundary spanner' role and is not merely gathering intelligence on publics for the sake of manipulating them to achieve some business objective but is making a genuine attempt to understand the needs of audiences for information and to create a dialogue with the organization if it is so desired.

## **9.0 CONCLUSION**

In conclusion, this literature review has explored the themes how organizations and in particular public relations practitioners manage issues that are disclosed publicly. Based on the work presented here, there are disparate elements in the business ethics, management and accounting, medical and public relations literature that provide influences for a disclosure model. There is a lack of comprehensive guidelines for PR practitioners to assist them in managing these situations and this thesis aims to provide a model grounded in practice from which further theory may be developed and tested. The model developed in this thesis may represent an original contribution to the public relations body of knowledge on this subject.

### **III. METHODOLOGY**

#### **1.0 INTRODUCTION**

This chapter explains the research questions, the research focus, the choice of research paradigm, and overall research strategy and research techniques. It thus presents the technical rationale for the empirical project which forms the basis of this thesis.

#### **1.1 Research Aim and Questions**

The primary aim of this thesis has been to develop a model for disclosure communication and to understand the role public relations practitioners play in making decisions in these situations. The model created in this thesis may be a guide that practitioners can refer to when confronted with disclosure situations.

The absence of disclosure research in public relations represented an opportunity for this thesis to make an original contribution to knowledge in communication management. The model developed through this research and the questions presented in this thesis, have provided some insight into how disclosure decisions are made and the role communicators play in helping their organizations manage these situations. Disclosure is a fairly broad topic that could have presented a number of avenues of inquiry but to keep this study focused on its aim of developing a model specifically for public relations practitioners and their involvement in organizational disclosures, the main research questions were:

1. What organizational situations or events merit public disclosures in the minds of communication practitioners and how are these communicated?
2. How does the organization's culture affect both its willingness to communicate and use specific methods or strategies to disclose information publicly?

3. What is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?
4. When involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?

Furthermore there was the objective to elaborate the practitioner perspectives on issues to do with disclosure into a model for practice. The nature of these questions is exploratory and since this topic is virgin territory for public relations research, the adoption of the qualitative paradigm was appropriate.

### **1.2 Qualitative Versus Quantitative Research Design**

Based on the inductive rather than deductive nature of the four research questions, this work has used a qualitative methodology to gather and analyze data and draw conclusions. There was no hypothesis to test and the purpose was to build the early stages of a model that could be tested in other settings outside the scope of this thesis. A quantitative approach at this early stage of development would have been too restrictive to follow the data and dive deeper into subjects and concepts as participants brought them forward. A survey questionnaire for example would not have allowed me to explore concepts as people brought them up in their discussions about their personal experiences with disclosures.

Data collection and analysis using qualitative research techniques enabled me to uncover themes as they emerged through the gathering of data in the research participant interviews and focus groups. According to Denzin and Lincoln (2005), qualitative research involves the use and collection of a variety of empirical materials including case study, personal experience, introspection, life-story, interview, and observational, historical, and visual texts that describe routine and problematic moments and meanings in individuals' lives (p. 3). This description is perfect for the subject matter that this thesis has explored. Disclosure events can pose highly stressful situations for organizations

and communicators that may force them to question their personal ethics and values against those of the organization. The qualitative methods of gathering data that Denzin and Lincoln (2005) have described, allowed this study to probe peoples' thoughts about disclosure and the rationale for the decisions they made to communicate when their organizations were presented with a situation where there was an ethical discussion among the institution's leadership about whether or not to provide information to affected publics.

In developing a model, the exploratory nature of a qualitative design enabled me to examine the many aspects of disclosure that have presented themselves in the participant interviews and focus groups. This approach has provided me with the flexibility in data collection to help answer the four main research questions. The model presented in this study was not measured quantitatively as Denzin and Lincoln (2005) described in terms of quantity, amount, intensity or frequency (p. 10). This study relied on the point-of-view of participants. Denzin and Lincoln (2005, pp. 11-12) suggested both qualitative and quantitative researchers are concerned with the perspective of participants but qualitative investigators believe they can get closer to the actors through detailed interviewing. This study adopted a qualitative method to allow me to get close to the participants through discussion and uncover their honest thoughts about a sensitive topic. Denzin and Lincoln (2005) proposed that: *qualitative researchers are more likely to confront and come up against the constraints of the social world that quantitative researchers abstract from and seldom identify directly* (p. 12). This thesis attempted to understand the constraints that exist for communicators who are presented with the challenge of disclosing organizational information.

In this thesis, it has been important to understand the confines that exist in the social world that might restrict an organization or more likely its players from releasing information. A qualitative approach to gathering data such as open-ended interviewing and focus groups, have provided the freedom to explore concepts in more detail and have helped me understand the underlying causes for decision-making at a highly personal level, which has been helpful in the development of a disclosure model.

Strauss and Corbin (1998) suggested that: *qualitative methods can be used to obtain the intricate details of phenomenon, through processes and emotions that are difficult to extract or learn about through more conventional research methods* (pp. 10-11). The field work for this thesis needed the latitude afforded in a qualitative design to investigate the reasoning people used to make decisions about either releasing or withholding organizational information. Quantitative methods did not seem to provide enough leeway to uncover emerging concepts that could come from conversations with participants therefore, it made sense that a qualitative research design would have been the most prudent approach to answer the research questions and achieve the intended aim of this thesis.

## **2.0 GROUNDED THEORY: A METHOD TO BUILD A MODEL**

### **2.1 Background to the Approach**

Once the decision was made to pursue a qualitative research approach, a paradigm had to be selected to guide the field research and data analysis. As evidenced in the Denzin and Lincoln 2005 text, there are many avenues of exploration available to qualitative researchers. The challenge is to find an approach that will structure the gathering and analysis of empirical evidence to arrive at a conclusion and provide answers for the research questions. Since the aim of this research was to develop a model, an interesting methodological fit is the approach Glaser and Strauss (1967) developed called *Grounded Theory*.

First published in 1967, grounded theory represented a reaction against extreme positivism that permeated most social research at the time according to Suddaby (2006, p. 633). When sociologists Glaser and Strauss introduced grounded theory, it was an attempt to find a compromise between empiricism and relativism by suggesting a middle ground in which data collection could be used to develop theories that address the interpretive realities of people (Suddaby, 2006, p. 634). Since the introduction of grounded theory, Bryman (2001, p. 390) suggested that the method has become the most widely used framework for analyzing qualitative data and that the original Glaser and Strauss

(1967) work has become one of the most frequently cited books in the social sciences. Interestingly, despite the popularity of the approach, following publication of their seminal book in 1967, the two researchers continued to develop the theory along different paths and Glaser felt that the approach to grounded theory that Strauss was promoting was too prescriptive and over emphasized the development of concepts, which are the building blocks or smaller components that are assembled through data collection, rather than bigger picture theories, which are based on a number of key categories that emerge as recurring themes in the data (Bryman, 2001, p. 390).

Strauss went on to evolve the approach throughout his career and in 1998, two years following his death, his collaborator Juliet Corbin published the second edition of *Basics of Qualitative Research: Techniques and Procedures for Developing Grounded Theory*, where the authors defined grounded theory as: *the development of theory that is derived from data, which are systematically gathered and sorted into concepts and categories which are analyzed through the research process* (Strauss & Corbin, 1998, p. 12). There have been expansions of the definition of grounded theory and various applications of the approach such as Partington (2000) and Locke (2001) who adapted the method from its sociological roots to use it in the development of management theories. Charmaz (2005) explained that grounded theory methods consist of simultaneous data collection and analysis, with each informing and focusing the other throughout the research process (p. 508). This was performed in this thesis by collecting and analyzing data to develop initial concepts for the model which were then validated and tested against focus groups. Charmaz, built on the Strauss and Corbin (1998) definition of grounded theory and suggested that the approach refers both to a method and a product of inquiry that offers flexible analytical guidelines that enables researchers to focus data collection and to build inductive theories through successive levels of data analysis and conceptual development (2005, p. 509). In an earlier work, she mentioned that: *'grounded theory methods consist of systematic, inductive guidelines for collecting and analyzing data to build middle-range theoretical frameworks that explain collected data'* (Charmaz, 2000, p. 509). This was achieved in the research for this thesis. The 'successive levels of data analysis' occurred through the

development of categories and the subsequent comparison of these in further interviews and focus groups provided data to develop a model.

## **2.2 Grounded Theory Process and Addressing Issues of Personal Bias**

*'There is no such thing as objectivity in the study of social reality. We will always be subjective but we may at least try to be inter-subjective, pooling and integrating a variety of subjective points-of-view of different observers. When we try to understand social systems we use models. Models are lower level systems which we can understand better and which we substitute for what we cannot understand.'* Geert Hofstede (1980, p. 15)

In the quote above, Hofstede was writing in defense of social science as it was described at the time as being a 'not-yet' science that was incapable of the same level of precision as the physical sciences (Hofstede, 1980, p. 15). His comments on objectivity and modeling are relevant to this research. The latter part of the above quote relates directly to the model developed in this thesis which helps to explain the decision-making that takes place around disclosure situations in organizations. The first part of his quote is interesting from the perspective of trying to maintain a purely objective stance in gathering and analyzing data. The topic chosen for this thesis is a personal one for me and maintaining pure objectivity around it has been a challenge. Strauss and Corbin (1998) addressed the issue of bias and they suggested that: *'It is not possible to be completely free of bias.'* (p. 97). They caution that researchers should be aware of their own biases and try to take a 'step-back' and ensure we are examining data as objectively as possible (Strauss & Corbin, 1998, p. 97). I bring my own set of experiences with disclosure to the research and have attempted to not let them cloud the collection or analysis of data. I have tried to let the data guide the development of the model. In fact, there are elements in the final model presented in this thesis that I do not agree with personally but the data have left me no choice but to include them. It would have been misleading as a researcher to include only the elements of the model that I believed would work. The model is not based on my experience. It is based on those who have participated in this research.



Charmaz mentioned that grounded theory methods offer legitimacy for conducting research including explicit strategies, and procedural rigour but her constructivist interpretation eschews the objectivist, positivist assumptions in earlier formations of the method (Charmaz, 2005, p. 509). Charmaz put forth the idea that a constructivist approach emphasizes the notion of researchers locating themselves in the realities of their work. She offered criticism of the Strauss and Corbin (1998) views on objectivity and suggested that grounded theory research cannot occur in a social vacuum and that researchers bring their own experiences and interests to the process (Charmaz, 2005, pp. 509-510). These two points are highly relevant to this research. My thesis has followed the Strauss and Corbin (1998) structure of grounded theory but as explained above, the necessity to remain purely objective has been a challenge. However, rather than seeing objectivity as a hurdle to overcome, my work experience was helpful in establishing a relationship with the participants in the study. By drawing on my real-life examples of disclosure situations, the participants in the study were better able to understand the purpose of the research and the information needed to help construct a model. My professional background was useful in establishing a rapport with interview participants and we were able to share common experiences about managing disclosure situations such as the difficulty in achieving consensus on messaging with multiple people involved in a disclosure.

Overall, the structure that the Strauss and Corbin (1998) approach to grounded theory provided was a benefit to me as a novice researcher and it assisted me in achieving the objective of developing a model. Even though the approach has received criticism for its complexity in terms of the fixation on coding and developing categories (Partington, 2000, pp. 94-95) grounded theory provided a qualitative method for the development of theory. The step-wise approach of grounded theory that Strauss and Corbin (1998) suggested, gave me a 'methodological check-list' that could be used to provide some structure around the collection and analysis for data. For example, the requirement for constant comparison forced me to examine my notes after each interview to determine where concepts and categories were emerging and how they could be explored further in subsequent conversations with interviewees. Once the model was developed, a further application of the

constant comparison requirement helped to provide validation for the model by testing it through a series of focus groups.

This thesis focused on organizational communicators and public relations practitioners with the hope that the result will have resonance with their work. As Strauss and Corbin (1998) suggested, most researchers using grounded theory expect that their findings will have direct or potential relevance for both academic and non-academic audiences (Strauss & Corbin, 1998, p. 6). Collecting data from those close to the subject matter to assist in the development of a theory is more likely to resemble reality than theory derived from putting together a series of concepts based on speculation according to Strauss and Corbin (1998, p. 12). They proposed that grounded theories are likely to offer insight, enhance understanding and provide a meaningful guide to action because they are derived from data (Strauss & Corbin, 1998, p. 12). The idea of providing a practical theory aligns well with the intention of this work.

Charmaz (2005, p. 527) provided some support to the practicality argument that Strauss and Corbin (1998) mentioned, when she wrote that *'...grounded theory must fit the empirical world it purports to analyze, provide a workable understanding and explanation of this world, address problems and processes in it and allow for variation and change that make the core theory useful over time.'*

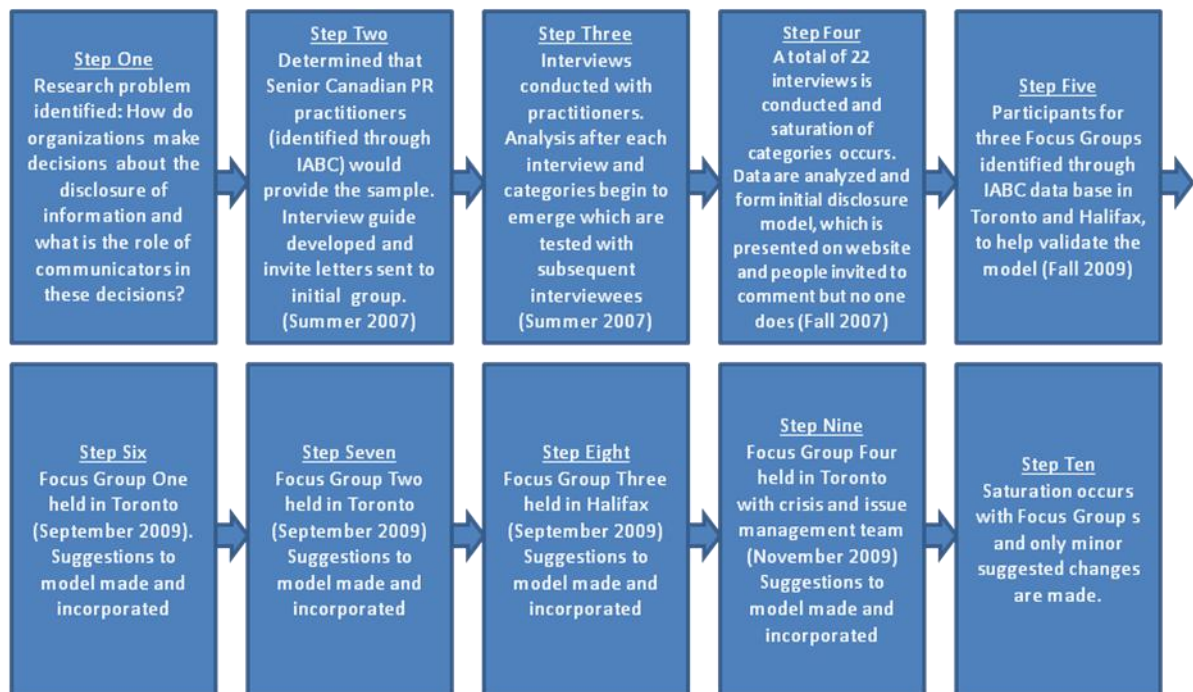
Charmaz agreed that grounded theory contains tools to study how processes become institutionalized practices (Charmaz in Denzin & Lincoln 2005, p. 529). Ideally this work could help communicators change or improve existing practices to ensure their expertise is used to contribute to the management of disclosure situations. The model generated through this work may provide a starting point for communicators to strategize about how to manage public disclosures.

### **3.0 RESEARCH PROCESS**

When using grounded theory, the researcher does not begin a project with a preconceived theory but rather the study is initiated with an area of interest in mind and the theory is allowed to emerge from

gathered data (Strauss & Corbin, 1998, p.12). In the case of this thesis, there is no hypothesis to test but the main research questions point to the challenge of gaining a better understanding of how communicators assist their organizations in managing disclosures. The schematic below outlines how the research process was conducted including sampling and the iterative nature of comparing concepts and categories and validating the model. The steps that took place throughout this research, as pictured below, will be described in this section.

### Research Process



Bryman (2001, p. 393) provided a helpful overview of grounded theory and its various steps that lead to theory building. He suggested that researchers begin with a general research problem, which is defined in this thesis as public relations involvement in decision-making about organizational disclosure (shown in step one above). As a next step, Bryman noted that relevant people and or incidents are theoretically sampled, data are collected which are coded into concepts, then through a constant comparison of concepts, categories are generated until they are saturated and relationships between categories are explored and theories about connections between categories emerge, and further data are collected by theoretical sampling to eventually form theory (Bryman, 2001, p. 393). These are represented in steps two through ten above.

Subsequent sections of this chapter will examine more closely how this thesis followed the steps outlined above, including the rationale for who and what will be sampled and how data were gathered, coded, analyzed and finally sculpted into a model.

### **3.1 Sample: Who and What will Provide Empirical Data?**

Grounded theory uses a concept called 'theoretical sampling' to steer the gathering of data which leads to the development of theory. Glaser and Strauss (1967, p. 45) defined the process as data collection for generating theory whereby the analyst jointly, collects, codes, and analyzes data and decides what to collect next to develop theory. In their evolution of grounded theory, Strauss and Corbin (1998, p. 201) added to the 1967 definition of the data collection process by providing more prominence to the creation of concepts that lead the researcher to broaden the sample until ample information has been gathered. Strauss and Corbin (1998, p. 201) stated that theoretical sampling is: *'data gathering driven by concepts derived from the evolving theory and is based on making comparisons, whose purpose is to examine places, people or events that will maximize opportunities to discover variations among concepts and populate categories'*. Strauss and Corbin (1998, p. 203) mentioned that theoretical sampling is cumulative and that each event sampled builds from and adds to previous data collection and analysis. Sampling becomes more specific with time because the researcher is directed by the evolving theory. In the beginning stages, the researcher is interested in generating as many concepts as possible and as these emerge, the samples populate categories to the point of saturation (Strauss & Corbin, 1998, p. 203).

Strauss and Corbin (1998, p. 204) offered some considerations for choosing a sample such as ensuring the groups chosen best reflect the research problem and are able to provide insight into the research questions. In the first stage of research for this thesis, a total of 22 Canadian public relations practitioners from across the country and from various public and private organizations were interviewed for about 45-60 minutes each (four were conducted in person and the remainder over the phone). Please see the table in Appendix A to see a list of the participants. A series of four focus groups were conducted to validate the model and themes identified through the interviews

(discussed in section 3.3, p. 107-109 of this chapter). Each of the interviews and focus groups were recorded digitally and then transcribed and used in the analysis. The interviewees were invited via e-mail and selected from the International Association of Business Communicators (IABC) database. This is one of the largest databases of communicators in the country and using it allowed me to involve an adequate number of participants to gather data and saturate categories to help build the model. The method of recruiting people for this phase of the research was consistent with what Strauss and Corbin (1998, p. 206) described as a method of sampling by going from one person to another on a list. They wrote: *'selection of interviewees or observational sites is relatively open in the sense that one could choose every third person who came through the door or could systematically proceed down a list of names, times, or places'* (Strauss & Corbin, 1998, p. 206). They justified this approach by suggesting that differences in data often emerge as a result of this process due to variations found in the experiences of participants (Strauss & Corbin, 1998, p. 208).

Senior level practitioners were required for this research to ensure those who would be involved in disclosure decision-making in their organizations were providing input. Those with the title of 'director', 'chief' or 'vice-president' were invited to participate. An attempt was made to attract people from various industries however, 55 per cent of the participants were from health-related organizations (two pharmaceutical companies, six hospitals, two health authorities, one health research lobby group, and one health-related charity) and the remaining were from universities (five), government (one), crown corporation (one), a non-governmental organization (one), and two other corporate (insurance and retail). Women represented the majority of the interviews at 73 per cent (16/22). The interviewees were promised anonymity and therefore their names and organizations were not used. The topic of disclosure seemed to be a sensitive one and to encourage an open dialogue, providing assurances of confidentiality seemed to put people at ease and allowed them to open up about their experiences. Specific demographic data on the interviewees were not gathered.

### ***Use of Vignettes***

Vignettes have been used by researchers from a wide range of disciplines to explore diverse social issues and problems (Barter & Renold, 2000, p. 308). Barter and Renold (2000) used vignettes in their research to explore the topic of violence that young people and children experience. They presented young people living in group homes with vignettes to illicit responses about their experiences with violence and found that this approach was helpful in exploring sensitive subject matter due to the dissociative nature of the vignettes from the actual experience of the children (Barter & Renold, 2000, p. 313-314).

In the research for this study, vignettes were used to stimulate discussion with each of the interviewees. Each of the participants was provided in advance via e-mail a fictional vignette that was based loosely on an experience that was in the news from the past year concerning their sector of employment. A simple Google search was used to find examples of disclosure issues. Search terms such as 'privacy', 'retail', 'insurance', 'hospital', 'pharmaceutical', 'government' and 'university' were combined with the word 'disclosure' to yield ideas. The vignettes were fictional and did not make reference to any specific case (please see Appendix B for the fictional vignettes used in the interviews). In total, six vignettes were created. It was encouraging to see how relevant the scenarios were to the interviewees as demonstrated by the comments below from different participants:

*I took a look at the at the scenario and I kind of looked at the questions and it's interesting that these are...the scenario rings true on a on a number of levels for someone like me*

*Well I looked at what you had provided and I mean it seemed so real... to the actual point where I've actually done with this particular thing with this particular problem before.*

Using vignettes was incredibly helpful in stimulating the conversation which moved beyond the fictional situations and into the participants' experience. This allowed me to develop a rapport with the interviewees by sharing my own experience with similar situations and it opened the door for me

to pose more intimate questions about the ethical rationale for why or why not an organization may choose to disclose information.

An outline of the questions or a 'discussion guide' was provided and the objective of the work was explained in the correspondence. Data were examined following each of the interviews and as concepts and categories began to emerge, further invitations were sent to ask others to participate in the study to validate the concepts and categories. As Charmaz (2000) pointed out: *'Throughout the research process, grounded theorists develop analytic interpretations of their data to focus further data collection, which they use in turn to inform and refine their developing theoretical analyses'* (p.509). When concepts emerged during the interviews, notes were made and these concepts were brought forward in subsequent interviews. A commitment was made to provide the participants with the model once it was developed. This was done via the development of an interactive website which walked people through a schematic of the model. It was hoped that this would offer an opportunity to validate the model. Unfortunately, there was no feedback received on the model. The web address was e-mailed to each of the interviewees, thanking them for their participation and they were invited to provide feedback on the model either anonymously on the website or directly to me via return e-mail. It is unclear why there was no feedback provided but this presented a serious challenge to complete the research. There was a need to validate the model but going back to the interviewees to do this did not seem viable given their reluctance to provide feedback on the website or send a reply e-mail. The model was eventually validated through a series of focus groups. This process is discussed in section 3.3 of this chapter.

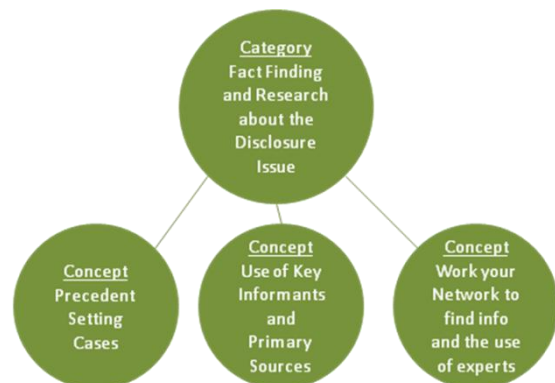
### **3.2 Interviewing and Coding**

In the Denzin and Lincoln text (2005) authors Fontana and Fray (p. 696) presented a novel method of data gathering called 'empathetic interviewing' which is directly relevant to this study. They write that empathetic interviewing takes a stance contrary to the scientific image of interviewing, which is based on the concept of neutrality. Fontana and Fray argued that interviewing is not merely the neutral exchange of asking questions and getting answers but rather it is a process that involves two

or more people in a dialogue where their exchanges lead to a collaborative effort that produces information and ideas (Fontana & Fray, 2005, p. 696).

I was able to share my experiences with disclosure during the interviews if a suitable opportunity for expressing empathy for a situation presented itself. This happened mostly with people who worked in healthcare. One person shared her experience when she acted as an advocate to disclose an issue but was met with some resistance from her management colleagues. I was able to share a similar situation. This seemed to help move the conversation along knowing that I had dealt with something similar. The interviews for this research followed a similar approach to what Fontana and Fray (2005) described as empathetic conversations that were open-ended with participants and relied on a discussion guide rather than a list of formal questions (see Appendix A for the Discussion Guide). Keeping the sessions open and avoiding a rigid structure of questioning allowed me to delve into thoughts and ideas that the interviewees raised. The interviews and the line of questioning were loosely structured around the research questions but had the flexibility to gather data and flesh out concepts and categories as they came up during the interview.

There are a number of important terms in the Strauss and Corbin (1998) approach that require some further explanation. Strauss and Corbin described 'concepts' as the building blocks of theory and 'categories' as concepts that stand for phenomena (1998, p. 101). Bryman (2001, pp. 391-392) described concepts as labels given to discrete phenomena which are produced through open coding, which is the process of breaking down, examining, comparing, conceptualizing and categorizing data. This process of coding yields concepts which are later grouped and turned into categories. He described categories as concepts that have been elaborated to the point of representing real world phenomena. A category may subsume two or more concepts and as such, categories are at a higher level of abstraction than





concepts (Bryman, 2001, p. 392). In the diagram above, one of the categories from this study is shown with its subsequent concepts.

Interviews with study participants were recorded digitally and data transcripts were analyzed until theoretical saturation occurred when there was little new information coming forward to formulate concepts and populate categories. According to Strauss and Corbin, a category is considered saturated when no new information seems to emerge from the data gathering process (Strauss & Corbin, 1998, p. 136). Saturation is a matter of reaching a point where collecting additional data seems counterproductive and anything else that is uncovered does not add much more to the explanation (*ibid*). As a result of the need to reach theoretical saturation, it was difficult to specify from the outset how many participants would be required for the study but a total of 22 interviewees helped achieve a sufficient amount of information where any further data collection seemed to be redundant. The information from the 22 sessions provided enough information to form the model.

Once interviews began and data were collected to form concepts and categories, there were two types of coding used to organize and sort information, 'open' and 'axial'. In the initial stages of data gathering and analysis from participant interviews, open coding was employed, which Strauss and Corbin defined as the analytic process through which concepts are identified in data (Strauss & Corbin, 1998, p. 101). During open coding, data are broken down into discrete parts, closely examined and compared for similarities and differences (*ibid*). Events and actions that are found to be conceptually similar or related in meaning are grouped under more abstract concepts and 'categories' (Strauss & Corbin, 1998, p. 102). As Strauss and Corbin (1998, p. 113) suggested, grouping small concepts into larger categories helps to reduce the number of units or themes in the data into a more manageable number and allows the process to turn its attention to explaining what was emerging in the information, which led to the development of theory.

When the open coding revealed a number of categories, the analysis moved to an axial approach to coding that was able to sift the data further to identify central themes. Strauss and Corbin (1998, p.

123) defined axial coding as the process of relating categories to their subcategories by examining how categories crosscut and link. They suggested the purpose of axial coding is to begin the process of reassembling data to form more precise and complete explanations about phenomena (Strauss & Corbin, 1998, p. 124). When analysts code axially, they look for answers to questions such as why or how come, and in so doing they uncover relationships among categories (Strauss and Corbin, 1998, p. 127). In this study, axial coding helped assemble portions of the model such as identifying themes in how public relations practitioners facilitate and advise organizational leaders on managing the communication of disclosures.

Both open and axial coding methods were performed on the transcript of each of the 22 interviews conducted in the study. The transcripts were reviewed for key concepts, which were highlighted electronically into different colors representing early themes that were emerging. These concepts were then reviewed and collapsed into broader themes or categories, which were also highlighted via color coding (yellow for issues relating to culture, red for data relating to the response of the organization to the situation, pink for segmenting publics, green for information about the role of the communicator in the disclosure, blue for decision-making about when and how to provide the information, etc.). These multi-color coded transcripts were then sorted electronically into their corresponding topics and then themes were identified (by repetition and consistency in responses from interviewees) from each of these sections, which began to shape sections of the model. These main categories and concepts are represented as headings in Chapter IV where the data are analyzed and discussed in detail.

Once the data were collected and categories were saturated, the foundation was set for the construction of a model. Strauss and Corbin (1998, p. 146) explained that the crucial first step in this portion is deciding on the central or core categories, which represent the main themes of the research. The central categories consist of all of the products of analysis condensed into a few words that seem to explain what the research is all about (Strauss & Corbin, 1998, p. 146). Defining the central categories in this work were consistent with the criteria Strauss and Corbin (1998, p. 147)

suggested: all other categories must be related, the core categories must appear frequently in the data, the explanation that evolves by relating the other categories is logical and consistent, and the concept is able to explain variation as well as the main point made by the data. There were actually four main central categories that emerged in the study data: weighing and understanding the disclosure issue, generating the organization's response to the situation, organizational culture and disclosure, and the role of public relations practitioners in disclosures. These will be discussed in great detail in the next chapter.

In subsequent steps, consistent with the Strauss and Corbin method (1998, p. 156) the smaller categories under the main themes were refined further by reviewing the data for consistency and poorly developed categories were either used to populate related areas or they were trimmed from the data. One of the benefits of using grounded theory is the requirement of 'constant comparison' of data between concepts and categories. Strauss and Corbin suggested that validation is built into every part of the analysis and sampling process (1998, pp. 211-212). The 'constant comparing' of concepts and categories was conducted, which allowed me to include in the model only those concepts and statements that were mentioned consistently throughout the interviews.

### **3.3 Validating the Model**

There were a number of steps used to validate the model that emerged from the interviews. The first attempt included the use of a website blog (<http://blogs.sunnybrook.ca/disclosurestudy/>) to solicit the opinions of those who were interviewed. Interview participants were sent an invitation via email to provide feedback on the model but unfortunately no comments were provided. Since this step failed, an additional step was needed.

To achieve validation of the model, focus groups appeared to be an effective method of gathering data that would provide a different perspective than individual interviews. According to Kamberelis and Dimitriadis (2005), focus groups have also allowed researchers to explore the nature and effects of ongoing social discourse in ways that are not possible through individual interviews or

observations (p. 902). Individual interviews strip away the critical interactional dynamics that constitute much of social practice and collective meaning making (Kamberelis & Dimitriadis, 2005, p. 902). Focus groups facilitate the exploration of collective memories and shared stocks of knowledge that might seem trivial and unimportant to individuals but come to the fore as crucial when like-minded groups begin to revel in the everyday (Kamberelis & Dimitriadis, 2005, p. 903). Focus groups often produce data that are seldom produced through individual interviewing and observation and that result in especially powerful interpretive insights (Kamberelis & Dimitriadis, 2005, p. 903).

Invitations to participate in a focus group were sent to members of IABC in Toronto and Halifax for the first three groups. The first location was chosen out of convenience and the second (Halifax) was selected to try to keep the 'national' focus of the research and to avoid making it too Toronto-centric. Once again, senior communicators were targeted but an attempt was made to avoid people who work in healthcare. This was done to broaden the sample from the previous stage of research where more than half of the participants were from healthcare backgrounds. The first two groups in Toronto were held on September 16 and 17, 2009, at the offices of NorthStar Research. The first group had five members and the second had six. The third group, held in Halifax on September 24, 2009 at Mount Saint Vincent University, had three participants and a planned fourth group in the same city had only one participant. The data of the 'fourth group' were excluded since one person does not constitute a focus group.

Each of the focus groups was recorded digitally and data from these groups were summarized at the end of each session and transcripts were coded and categorized. The first three groups were each shown the version of the model that was developed from the interview data. A final fourth group was held in Toronto, on November 16, 2009, which was somewhat different than the first three. This group was provided with a version of the model that was based on feedback from the first three focus groups. This fourth group was selected specifically for their expertise in crisis and issue management. I wanted to have a group of consultants who spend their days advising people on how to manage sensitive disclosures, crises and other issues, provide input on the model. Six people

participated in this group who were all former political operatives (Chiefs of Staff, etc.) at the municipal, provincial and federal levels of Canadian government. The feedback from this and the other focus groups is discussed in detail in Chapter VII (pp. 248-307).

Feedback from the four focus groups was helpful in making adjustments to the model. People had wording suggestions and a few boxes were added and others moved around for the sake of clarity and process but since these were essentially minor tweaks, after four focus groups I decided that based on the minor changes being suggested, there was no need to gather further data. Based on the feedback from the four focus groups, another website was set up to again try to solicit open feedback from communicators (<http://blogs.sunnybrook.ca/disclosurestudy/>). Email messages were sent to IABC and the Canadian Public Relations Society in November 2009, to ask them to share the website with their entire membership. Unfortunately, there was no reply received from either organization and as a result, this step was abandoned.

#### **4.0 LIMITATIONS**

Limitations of this study include the sole focus of the sample on Canadian public relations practitioners, the absence of data from stakeholders who may have been impacted by the disclosure scenarios as well as the lack of organizational perspective from people other than the study participants such as members of senior management teams. However, the purpose of this research was to provide a model for public relations practitioners and although the input of others may have offered an added dimension to the data, the objective of the research was to learn from communicators. Future studies may examine the opinions of others to create a disclosure method that might have broader application.

To understand the relevance of the model in other settings, it will need to be applied in various other sectors and cultures to determine if there is any validity beyond the sample chosen for this research. The participation of a wide-range of public relations professionals, representing varied backgrounds and experiences will improve the likelihood of this work having some usability in practice but the

limited scope of the sample and qualitative approach means the results need broader testing with groups in different countries to be generalized to a larger population of communicators. In addition, the participants in this research were senior level practitioners and were members of IABC. Their opinions may not be consistent with junior practitioners. Academically, this research effort could lead to other investigations such as the direct involvement of internal and external stakeholders who could provide input on how disclosures impact them and how communication efforts might be improved.

A final limitation on the results of this thesis may be my personal bias. As addressed earlier in this chapter (p. 96), Strauss and Corbin (1998, p. 97) suggested that it is not possible to be completely free of bias. In a couple of interactions with participants for this research, I have had to exercise restraint and avoid injecting my own opinion into a conversation. My personal experience with disclosure situations has provided me with a passion to conduct this research but I have kept my personal opinion to myself in interviews and focus groups when people have shared something that is contrary to my perception of how to handle a situation. My experience has allowed me to demonstrate empathy for a situation a participant may have relayed but I drew the line at expressing my opinion about suggestions people have put forward to change the model. This has been difficult. After putting so much personal effort into this work, you cannot help but become emotionally invested in the thesis to the point where you have to consciously avoid taking ownership over the model and making changes based on personal opinion of what might work and might not work in a practical situation. The biggest challenge has been to simply allow the data to speak for itself *res ipsa loquitur* and there are pieces of the model that are not necessarily relevant to my experience in disclosure situations but my history with these issues is certainly not representative of how they should be managed across sectors and cultures. The model presented in this thesis is an amalgam of comments made from the participants and may not even apply directly to their own situations but it may provide an opportunity to start a further discussion about disclosures and about how they may be managed in different settings. The model cannot be generalized to broader application but it does present opportunity for future research.

## **IV. INTERVIEW DATA ANALYSIS: DEVELOPMENT OF CONCEPTS AND CATEGORIES**

### **1.0 INTRODUCTION**

In this section, data gathered from the 22 participant interviews that were conducted in the summer of 2007, are presented, analyzed and discussed consistent with the approach to grounded theory that Strauss and Corbin (1998) described, where key categories were developed based on the most prevalent themes that were revealed during the collection of information. The purpose of this portion of the thesis is to identify the emerging concepts and categories that led to the development of the initial model that is tested later in the thesis in Chapter VII. The concepts and categories presented here were developed through an iterative process that compared data from each interview to uncover consistencies in how practitioners would manage disclosure situations. In addition to the procedural steps of decision-making and communicating about the disclosure several other concepts were identified that do not lend themselves to boxes on the model schematic but relate directly to the four research questions for this thesis. Data that support the research questions are also presented in this chapter.

Feedback from study participants that appears in the following chapters is based on their personal and practical experiences and their responses to fictional vignettes that were sent to them prior to the interview (please see Appendix B for a full list of the fictional vignettes used in the study). The scenarios were used to elicit their reactions to hypothetical disclosure situations. These data are rich and move beyond the reaction to the fictional vignettes. Participants were generous with their feedback on the topic and the information provided here has laid the groundwork for the model, which is tested further in Chapter VII. The participants covered a wide range of topics during their interviews, which are presented in this chapter as headings or sections representing the four core categories or central themes that emerged in the data. These core categories were developed based on the constant comparison method in grounded theory and the saturation of categories:

- Weighing and Understanding the Disclosure Issue
- Generating the Organization's Response to the Situation
- Organizational Culture and Disclosure
- Role of Public Relations Practitioners in Disclosures.

Each core category represents a theme that was derived by finding consistencies in similar sub-categories and smaller concepts. These will be illustrated with a helpful diagram at the beginning of each section. The diagram includes the core category, sub-categories and the smaller concepts that make up each. Data from the participants are provided in tables and are discussed in relation to their relevance to the model and research questions.

## **2.0 WEIGHING AND UNDERSTANDING THE DISCLOSURE ISSUE**

In this core category, there were a number of categories that emerged from participant comments that centred around the notion of how communicators in the study would become informed about the issue, including how they would learn more about it and what processes they would go through to better understand the situation and assess its potential impact on the organization and its publics. Data provided in this section relate to research question one: *What types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?* Evidence will be shared from participant data that make up five main categories for this section:

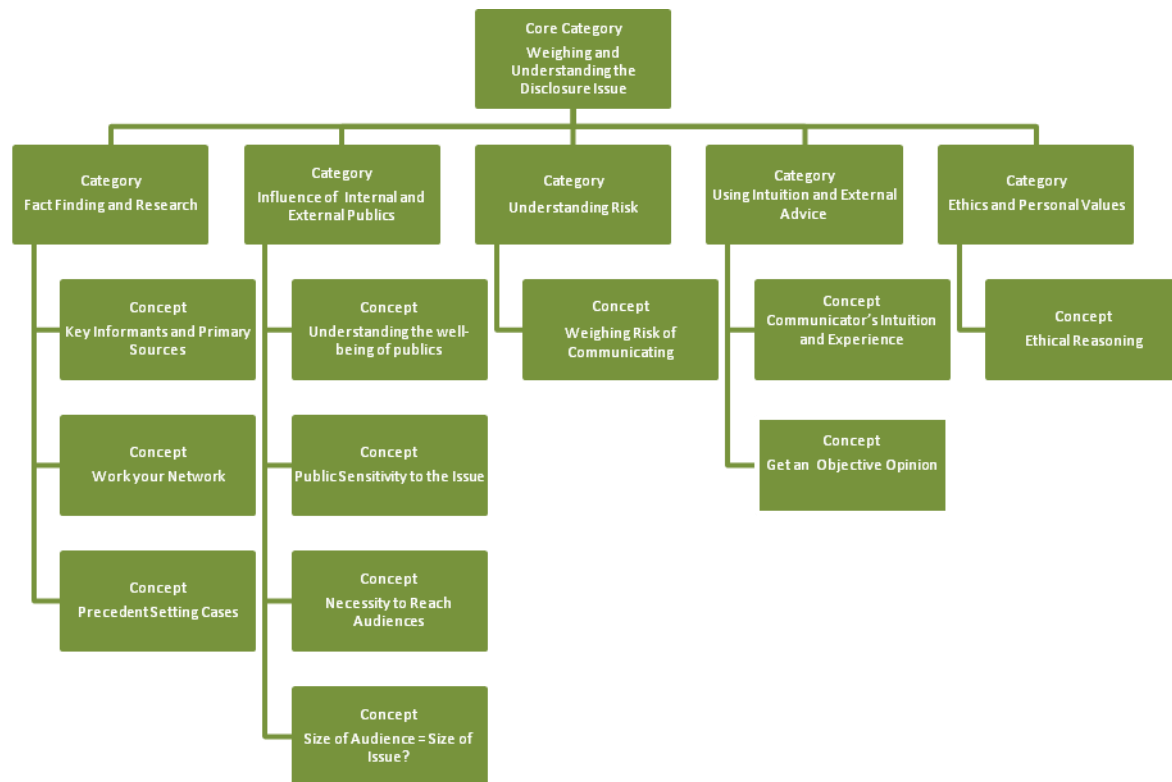
- 1) Fact finding and Research
- 2) Influence of Internal and External Publics
- 3) Understanding risk
- 4) Using Intuition and External Advice and
- 5) Ethics and Personal Values

This is a logical starting point for the development of a model and in fact data from these categories have led to the creation of steps one through seven of the model that requires the practitioner to



gather information, understand the gravity of the situation by determining a number of issues such as who is involved, and make a series of ethical decisions about whether or not to disclose the information. At this stage, the interviewees described their decision making process for how they would eventually develop a formal strategy or action plan that they would recommend to the management teams and governing bodies of their organizations. Evidence from the interviewees for this core category is presented in quotes throughout this section.

**Schematic of Core Category One: Weighing and Understanding the Disclosure Issue**



**2.1 Fact Finding and Research**

In this sub-category, there were data provided on the importance of getting to the source of information as quickly as possible to find out the facts from those who are closest to the situation. In the table below, comments from the participants demonstrated that disclosure types of issues land on their desks from a variety of sources. There was a need identified to sort through rumour or misinformation that may have come to them from the initial notification of the disclosure issue and the best way to do this was to identify those who have an intimate knowledge of the situation and

those who may be able to provide further interpretation for any of the facts that practitioners are able to gather.

**TABLE 1: Key Informants and Primary Sources**

*I think one of the first things that you immediately think about is, where...how do I get the right or the best information. What (sic) are the people that I need to talk to? Who do I need to interact with? Because sometimes someone who's flagging it, you know somebody else said it to someone else to someone else and you're just trying to make sure that you've got the right person. In that initial interaction you're asking them all the right questions, and then trying to figure out where the holes are or where the gaps are that you need to fill. Director of Communications, University A, Ontario*

*I think that speaking to the right people...there may be the physician who's the closest to the patients, and not just the lead; the pharmacist who's closest and most knowledgeable about the medication; there may be sort of a manager that understands the systems approaches, trying to not have extremely lengthy conversations but have good prepared questions ahead of time to ask them the right things. And I would ask, probably from the pharmacy level, what...to send actual protocol and systems documents, because there must be policies and things written down as to what you're supposed to do make sure something's not mislabeled. So you want to just look at those and understand, yes we do have a standard or a policy, or things that are in place. Chief of Communications, Hospital A, Ontario*

*I thought the first thing that I would do is, because the scenario says I heard it through the grapevine...the first thing I would do is try and confirm. And I'm just thinking...yeah, so the first thing I and I'm...the first thought that went through my head is the hospital's probably not going to tell me anything that the residents should know. And so my first call would be to the residents. Vice President Communications, University, Alberta*

*You know you've to be the barometer of this is going to be okay. So I find that actually sitting people down and saying: "Let's just document the information that we know as cleanly and clinically dare I say as possible," and then I think you look at worst case scenarios. Vice President, Communications and Marketing, Hospital D, Ontario*

*I think then you'd probably want to talk to the Head of Pharmacy, just to get a feeling of what's going on within the team. Usually things like this are systems errors, so you have to be really careful not to try and make it seem as though you or any of the senior team are out on a witch hunt. So it's just trying to understand better, what may have actually occurred to create the problem...to actually make something be labeled incorrectly. And get as clear an understanding as you can, what processes are really in place to make sure that doesn't happen. They don't happen every day, so usually...what might have been the misstep that made that process go off the rails. And then what individual, sort of the lead already thinking about in terms of making sure it doesn't happen again. Vice President, Communications, Hospital F, Ontario*

Interestingly, although it was mentioned in the data that it is important for communicators to get to the source of information quickly to ascertain what happened, there was acknowledgment of the importance of avoiding the perception of a 'witch hunt' in pursuit of the facts (as evidenced in the final quote above from the hospital vice president) . There seemed to be caution expressed by the practitioner to avoid being viewed an emissary of management who is sent in to find out what happened and pass along the bad news to those in power who can take punitive or disciplinary actions upon those connected to the situation. Throughout this chapter, concepts are discussed that may not necessarily be specifically represented on the model schematic but are important themes that will inform the development of the model. Two examples of this are the softer concepts of appreciating the emotional turbulence of those directly involved in the situation and understanding how they may perceive senior communicators as agents of management. These may not necessarily

lead directly to a step in a decision-tree on the model but this information could be seen as an important cautionary piece of advice for communicators when dealing with these situations.

Beyond speaking to those who have first-hand knowledge of the situation, it was mentioned in the interviews that communication practitioners should use their internal network of contacts to broaden the scope of their information gathering (see table 2 below for evidence). Expanding internal networks could ensure the communication strategies and tactics are based on the most complete and accurate information. These comments suggested the importance of communicators staying in touch with what is happening in their organizations through both formal and informal networks. One of the themes expressed in the data was the need to build contacts regularly so when disclosure issues present themselves, there is some efficiency in knowing who to contact for more information when it is needed most urgently. The quote from the participants in table 2 illustrate this point as they spoke directly about the importance of talking to people about their role in the organization and creating a network of people who can be relied on for information. The Director of Communications for the Pharmaceutical company, quoted below mentioned how liaising with other members of the management team and those in the field can be beneficial to obtaining further background on the issue and how wide-spread it might be in the organization's external environment.

**TABLE 2: Work your Network**

*I would liaise with...let's say it's VP of Marketing and Sales, I would see if there was really some kind of low level intelligence gathering that we could do through the sales force. And maybe not widespread, but maybe speaking to a couple of Regional Managers to see if there are other things that we should be aware of that are of a similar nature, or what have they heard. Are there things happening in their markets? Again, just very low level...just to get that intelligence if you will. Director of Communications, Pharmaceutical Company A, Ontario*

*So I would get in touch with all those people who I've...who are sort of my normal contacts, and both with the Student Health Center, the Medical Director, whoever the medical leadership is over there, to find out what the status of the situation is. With the senior residence folks, to find out what's going on over there, in terms of what they know about the students who've come down with it. Are there other residence buildings where they've got some kids that may be presenting, or feeling the same kinds of symptoms that haven't presented yet to the health center that they should be. Vice President, Communications, University, Alberta*

*So every day that I'm making good contacts around my institution with people who may not be, kind of related to the day to day stuff that I do, but I'm keeping good working relationships going. That's like money in the bank. Whenever stuff like this happens, and it does, in places that you and I work right now, you've kind of got those relationships. You know that you can call up that person, they can call you. Director of Communications, University A, Ontario*

*I would be talking to the doctors, making sure I've got my...I've got the information accurate. I would be talking to our infectious disease people to make sure that I've got that information accurate. And I would be using our university registration system, make sure that I have...not that I'm not publicizing the student's names, but in my back pocket, I need to know all the details about these students. And so their name, what faculty they're in, what program they're in, what age they are, what hometown they're from, all these sorts of things. So I would have that in my back pocket. Chief Communications Officer, University, British Columbia*

Seeking the help of experts was a theme in the fact finding process as evidenced above in the final quote from the Chief Communications Officer (and in table 3 below). Experts are not necessarily those closest to the situation but there seems to be a need to discuss the facts objectively with a trusted advisor who may or may not be a part of the organization but who can offer an unbiased opinion about what is taking place. Consulting an expert provides the communicator with an additional source of information that can validate or possibly reject the information that has been uncovered about the situation. The opinion of this person can be critical to providing perspective on the situation by being a secondary source of information for the communicator to ask any follow-up questions about the situation and possibly the expert can offer an opinion on the actual level of risk involved with the directly affected audiences. Hofstede (1980) suggested that the use of experts, who may be in-house specialists or outside consultants is an 'uncertainty avoidance ritual' that organizations may use to reduce the ambiguity of a situation (p. 118). He commented that whether or not the expert can apply more information, insight or skill to solve the problem is often immaterial as long as the organization sees the expert as transforming uncertainty to certainty (Hofstede, 1980, p. 118). The concept of using experts to act as a spokesperson may be relevant for the disclosure model when the organization is trying to organize its plan, assess risk and find spokespeople for the issue. Talking to an expert close to the situation may help the communicator make a judgment call

on the level of reputational risk the organization is exposed to as a result of the situation. 'Gut instincts' and 'judgment calls' are discussed more thoroughly in the next chapter and later in this section (p. 127).

Building on the theme of expert opinion, one of the fictional scenarios used in the study helped draw out how the participants relied on the advice of others who specialize in an area. In the vignette, a small group of students appeared to have contracted a highly contagious gastrointestinal virus (please refer to Appendix B for a full list of the vignettes used in the study). As evidenced in the quote in table two above from the University Vice President and University Chief of Communications, some of the participants presented with this issue believed that it would be essential to consult with medical specialists to ensure the information gathered was as precise as possible and to get a thorough understanding of the situation.

In tables 1 and 2 above, there is evidence that the importance of gathering information is seen as an essential step in gaining knowledge of the situation, which will ultimately assist in making a decision about how and when to communicate. But another concept that emerged under the fact-finding category was the notion of looking for precedent setting cases that could guide or inform how to respond to the current set of circumstances facing the organization (see data in Table 3 below). This information included talking to people in the organization to see if any institutional memory may exist regarding similar situations the company may have experienced and how these were managed.

**TABLE 3: Precedent Setting Cases**

*Just because it's an incident, it's not necessarily a crisis, but it is an incident, or an adverse event, in our case. And then, again for me it would be gathering all the facts, taking a look at the previous product history on this thing, and issues around the product.* Director Communications Pharmaceutical Company, Ontario

*I'd certainly want to know immediately the last time we had something similar like this how did you handle it? Did that work, didn't it, what did we learn from it and so how do we think that should inform what we want to do going forward?* Director Communications and Marketing, Retail Chain, Ontario

*What I was trying to mean by that was, what would the current cultural issues that would be occurring. So, in other words, if there had just been another extremely big identity theft issue with another company that had backfired, or it had gone negatively, how...what could we learn from that?* Chief Communications, Lottery Corporation, B.C.

*I would definitely look at precedent, and see how has the organization handled this kind of problem before, and look at the method and the approach and the tools that they used and the style that they used to address the issue. I would listen very carefully for what the CEOs reaction was, if I even had access to him, because a lot of junior folks don't even have access to the big guy. But I'd listen very carefully and watch to see the signals that come from that office in terms of how to deal with the issue.* Vice President Communications, University, Alberta

*I probably...usually what I do is a little bit of Googling as well to see what sort of benchmark's been set by other people in similar situations as well. To see if there are things that resound, but mostly I tend to do those things internally, and fortunately or unfortunately, based largely on my own experiences and intuition.* Director, Public Affairs and Communications, Lobby Association, Ontario

*I would go to obviously senior people at the university and address that question of precedent and talk about what we did last time on a comparable incident and then have a discussion about whether we think that it's on all fours with the current situation, whether the times have changed or the circumstances are different enough and so that would be the first people that I would go to really discuss it with them.* Vice President Public Affairs, University C, Ontario

*I would look at past learning and experience. I would absolutely look at the legal stand on it as well and past models. What models have been used in the past? What has this company used in the past, and what have other companies used in the past?* Vice President, Corporate Affairs, Insurance Company, Ontario

In the quotes in Table 3 above, the participants illustrate the importance of searching for examples to help guide the development of a communication plan or recommendation. In the fifth quote, from the Director of the Lobby Association, there is a nice reference to the person's method of seeking out advice that combines using a network of people who may be able to add an opinion and the use of technology such as the internet search engine Google, to see if there is anyone else who has had a comparable situation occur. Later in the chapter, there will be discussion of how communicators use technology as tactics to reach audiences but this response may suggest how the internet is playing a role in early strategic decision-making.

In the fourth quote in Table 3 from the University Vice President, what is particularly compelling is the emphasis the interviewee places on reading and watching the initial reaction of the CEO to the situation. The influence of management and leaders on communications will be discussed more thoroughly in section 4.0 of this chapter, but it was interesting to hear the participant raise the notion of looking at the CEO for clues about how to respond to the situation. This may imply a power

relationship that exists between the President and CEO and communicators. It may also be a reference to how this communicator senses the severity of a situation by looking at the reaction of others. The relevance of this to the development of a model may allude to a step that requires communicators to take their best read of situation based on the reaction of those involved, possibly starting with the CEO.

In this next section, the idea of considering the impact of the disclosure situation on internal and external stakeholders will be discussed in greater detail. This will help reveal the role audiences play in determining organizational action when confronted with a communication decision that could lead to publicly discussing sensitive information. Whenever disclosures occur there are a number of risks organizations should consider such as the power this information will have on immediately affected audiences and residual groups.

## **2.2 Influence of Publics and Risk on Disclosure Strategies**

In the discussion of this category, there is more of an emphasis in the data on the criteria involved in decision-making about disclosures than in the previous section. In the previous section, evidence was provided to demonstrate how communicators are informed of the situation and the steps they took to begin to understand and assess the situation, but in this section some of the criteria and further influences on disclosure decision-making are revealed such as the level of harm that has occurred. There are four main concepts covered in this category: i) understanding the well-being of publics, ii) public sensitivity to the issue, iii) necessity to reach audiences and iv) size of audience and the size of the issue.

In Table 4 (below) the quotes from the participants show that they would examine the situation based on the level of emotion involved, the information that publics may have already about the situation, and the level of harm that may or may not have occurred with the affected group. Some of their criteria for understanding the situation and its impact on those involved are analogous to the criteria that Kaufman, Kesner, and Hazen (1994, p. 35-37) mentioned that were discussed in the Literature

Review (p. 73). They proposed a number of criteria to determine the severity of the situation and posed a number of questions that were fairly organization-centric with the exception of the first criterion that asked whether or not publics were in immediate harm by not knowing the information. The issue of ‘harm’ with respect to disclosure decision-making is discussed in the presentation of the first iteration of the model in Chapter VI (p. 222).

**TABLE 4: Understanding the well-being of publics**

*The level of emotion would be one of the criteria I would think about. And then again, for XXXX, it would be Health Canada's adverse event reporting criteria because they have pretty strict guidelines for this kind of stuff, and so does XXXX. We have a whole, sort of bureaucratic process to go through, which is nice. In this case, it's nice.* Director of Communications, Pharmaceutical Company A, Ontario

*So I would probably just try and understand...I mean there is quite a bit of information here, but what do these patients know? Has anybody communicated anything to them, because staff can always start speaking to people out of turn. You just want to know what information is out there already.* Vice President, Public Relations, Health Authority A, British Columbia

*The patients weren't harmed, and trying to keep it in perspective, and not going sort of on and on and on. You kind of need to accumulate all the detail at the beginning so you fully understand it. You make sure that there isn't something dug in there might be a real problem that you need to know about. Whether there was gross negligence or something really awful that you at least need to uncover.* Vice President Public Affairs and Communications, Hospital C, Ontario

*So I guess the first thing is, I'd like to try and figure exactly the specific direct impacts on the patients. I mean there's sort of a general note that some worse nausea, and sort of...everything, I'd like to make sure that there isn't anyone out there who's had a major adverse impact or incident, that might actually trigger something much bigger. So getting some details, or so what actually happened. And then trying to find out pretty quickly from...whether it's the Head of Oncology as it was in this case, I think as it was described, just let me look at the note...what were the immediate steps that we did to rectify it. Did we pull all of the meds, did we...what did we do in the short-term right away, as soon it was discovered. And then, have a look at what are the likely next steps.* Vice President Communications, Hospital F, Ontario

*Nobody died. It's a significant number of people, and it's an issue that affects a huge percentage of the population directly or indirectly, so, yeah I would think that in this case the breast cancer oncology overdose, yeah, that's got some news value. And from there, you can sort of weigh out is this going to be something massive. I mean if these 250 people, if half of them died, then this is massive. We're bringing out the big guns and hosting a news conference, and we're going to do the whole shooting match. In this case it's...there was no great harm, but I think we can get out in front, we can rehab the image.* Director of Public Relations, Health Authority B, British Columbia

In the quotes in Table 4, the interviewees mentioned the importance of finding out what information is generally known about the issue, which indicated an attempt to understand the volatility of the disclosure issue and how quickly the messaging could spread uncontrollably from the organization. One of the themes that is discussed in the next core category ‘Generating the Organization’s Response’ is the notion of ‘proactive communication’ and the need to ‘get ahead of the story’ but the mention in the quote above from the Health Authority Vice President, about trying to understand what information is out there already is an attempt to assess the level of knowledge the public may have about the situation which could impact the speed of reaction from the organization and the need for basic messaging to explain the situation. Although in the quotes above, the responses indicated that they are still trying to understand the issue and assess the gravity of the situation,



there appears to be a perception that this information would be used to keep the situation in context. Two of the participants above mentioned that no one in their fictional scenario was harmed or died and two of the interviewees said that depending on the level of harm involved, the communication response may be more robust such as hosting a news conference.

In Table 5 below, the comments again included evidence of assessing the situation as best as possible to gauge the level of response from the organization. In these quotes, the interviewees look outside of their organizations to determine what might be in the 'environment' or of interest to local media that might give the issue more profile.

**TABLE 5: Public Sensitivity to the Issue**

*And if they're on a mission to...and I mean it can happen that people are so angry that...I think our...I always say to people here, "Look, it doesn't matter what might happen in the media. The first thing you have to do is decide clinically what you need to do. And then we will deal with whatever happens. Vice President Communications, Hospital F, Ontario*

*It has to be a priority so whether or not action is actually taken is maybe the second question but the first one is you know let's get through it, let's understand it and let's make informed choices about how to move forward and that's the priority. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*Competitor issues around this kind of product, and again, the media environment. Has there been stuff in the media? Has the media heard about this? And I think, again, for us specifically, the criteria for assessing the situation from a communications perspective would for me be very much dependent on the level of risk assessed by our medical folks. I think the other thing about the messaging though goes back to like kind of what's the environment around this product? Does anybody know about it? Is it in the media? Is there a lot of attention? Are there issues around it? Because if no one's ever heard of it, it's not being used, it's not on the radar, that's going to influence a) the extent of your communication and b) the messaging. Director of Communications, Pharmaceutical Company A, Ontario*

*It depends on the gauge that I have already established with what is of interest to the community. What is of interest to the local media? Chief Communications Officer, University, British Columbia*

*I once read a case about Dow Chemical, which decided to report every chemical spill they ever had in Sarnia. So finally, when they really had a big one, pretty much people kind of ignored it because they'd been telling them all this time about it. So I think, I mean, you know this as well as I do, sometimes when you put it in a news release, it automatically becomes less newsy, right? Because journalists think, "Well, if I didn't discover it, then if they're telling me, how can this possibly be important?" Vice President, Public Affairs and Communications, Hospital C, Ontario*

*Well, I think you want to consider what's going on within an industry or a sector. Are there any political or economic factors at play? For example, six months ago was another company involved in a similar situation and they didn't...and depending on how that company responded they were subject to criticism, and so it's shone a negative light on the whole sector. Well, maybe that would prompt our company in this case, to be more proactive in certain strategies. Director of Communications and Marketing Corporate, Retail, Ontario*

*If I'm guessing that, "Yeah this is going to be a story", and someone else is saying, "No, no one's going to care, no one's going to raise it. Why would you raise it for them?" And that's a battle that you have to have. But health is certainly...certainly it's Canadians' favourite blood sport. They love to kick it around. So there's very little that doesn't get leaked out there in some way, shape or form. So I'd...I like I said again, I keep coming back to, I'd rather be in front of it than reacting to it on the backside. Director of Public Relations, Health Authority B, British Columbia*

Interestingly, there was little or no fear expressed in the quotes above about the situation gaining media attention. Participants above were sensitive to media coverage but did not seem daunted by it. These findings are consistent with a healthcare study from Lamb, Studdert, Bohmer, Berwick, and

Troyen (2003), which demonstrated, through a survey of risk managers in a sample of American hospitals, that the potential for negative media coverage was not a deterrent for hospitals to disclose adverse events to patients and their families. In the first quote above, the priority for the Hospital Vice President was to provide reassurance to the clinical team that regardless of what the media might think or report, it is critical to ensure the safety of patients first and foremost.

In the quote above from the Vice President of Hospital C, that makes reference to Dow Chemical, the communicator put forth a compelling notion that a constant stream of disclosure seemed to desensitize an audience to the information. She mentioned that if an organization actually puts information in a news release that reporters may not believe it is a serious situation. She speculated that unless reporters believed somehow that they have uncovered something that no one else has, there would be little news value to the story. The level of interest in a disclosure issue may be dependent on the level of interest the public has in the story. If a community is perhaps uninterested in chemical spills then maybe the organization does not have to put too much effort into communicating them. In Table 5, the quote from the Director of the Health Authority, the interviewee mentioned that healthcare is '*Canadians' favorite blood sport*' and that issues arising from this sector may generate greater public attention than others. This is similar to the idea that was raised in the Literature Review (p. 122) where Brammer and Pavelin (2004) found that disclosures are related positively to an organization's size, media exposure, social performance, and are more common in industries that have a perceived association with social issues (Brammer & Pavelin, 2004, p. 89). It may be beneficial for public relations practitioners to be aware of the public sensitivity to their organizations and how issues or disclosures have been received publicly in the past when they have been communicated. Knowledge of this may contribute to the disclosure decision-making process.

To further determine the weight and severity of the issue with respect to the role of the audiences involved in the situation, one of the areas of discussion that emerged among the interviewees was the necessity of reaching an audience to communicate the disclosure. In the table below, data from two of the hospital communicators showed that as the number of people involved increases, they

considered increasing the level of communication activity to reach broader audiences than those who are impacted directly. Using a greater number of communication tactics to reach people, as described in the table below, could be a function of the need to reach people such as using a public service announcement (PSA) on local media to inform people about a situation, when registered mail may not be as effective in terms of timing.

**TABLE 6: Necessity to Reach Audiences**

*So, there's kind of not a question about whether we will or we won't. Usually when it comes up, it's a matter of how will we disclose, and whether we will publicly disclose because that will allow us to access people who we've lost track of and so, I think when we look it, it's kind of can we get to all those people. Well, the other question is, is there any remedial action that needs to be taken right, and if there is, how quickly does it have to be taken?* Vice President, Public Affairs and Communications, Hospital C, Ontario

*So if you're talking about two patients, I'm sure there's stuff that's happened that I've never heard about. When you're talking about 250 patients, somebody from my team or I would be involved. I mean 250 people is a lot. Without having the expertise of the clinical team, I don't really know what they'd decide... I doubt very much that they would do a mailer.* Vice President Communications and Marketing, Hospital D, Ontario

*If we thought we couldn't get hold of all the affected patients that would be one reason. If we decided that we were going to do registered mail delivery of materials that would be another. So, the moment it moves from a discussion between a healthcare provider and a patient in a room, as it...then the moment you start putting material out there, we would probably start regarding those really as public documents. And then, it's really a matter of...if it's 800 people, we might put out some kind of PSA announcement. I don't know at 250, depending on what the clinical team thought.* Chief Communications, Hospital A, Ontario

In Table 7 below, the data show the size of the audience involved in the disclosure may influence the communication response from the organization but the caution from several of the interviewees quoted below seemed to be to avoid causing unnecessary panic by communicating too much when it is not required to reach the audience. In the fifth quote below, from the University Director, the respondent mentioned that there is no 'line in the sand' about how far to go with the tactical response in terms of informing just the audience or also bringing media attention to the situation. In the final quote in Table 7, the Vice President of Hospital F mentioned that his organization had disclosed that it had compromised the personal health information of 5,000 people and no one contacted the media. Had the decision been made to release the information to the press, it may have caused unnecessary reputational damage to the organization. It seems, based on the data here, that there may not be a single rule about when to contact stakeholders beyond those who may be immediately impacted with the situation. It would be interesting to test this concept further in a study that can yield some statistically significant results to see if there are consistent 'guide-posts' people may use to determine how far and wide to share their organization's disclosure information.

**TABLE 7: Size of Audience = Size of Issue?**

*I would say if we were to look at this scenario, I think we've sort of...we've gone into an issue management mode. I don't believe that this is a crisis yet, but it's definitely something that we want to be on top of. We want to be prepared. And that's sort of the perspective that I would be taking at this time, based on what we know. So in terms of communicating I would then start using that...start small. And I would be looking to establish some lines of communication with the regulatory bodies about this. Director Communications, Pharmaceutical Company A, Ontario*

*In this particular situation, given that there are just four students, that there hasn't been a complete diagnosis yet on what's going on, I would see that putting something out mass communication wise, that has all these suspected things in it...unless there's a rumour mill that's pretty active, I would see that would actually be quite irresponsible. I would see that that would be creating panic and possibly risking the reputation of the university by getting out there that we suspect that there might just be something going on. Vice President Public Affairs, University C, Ontario*

*Another thing that we'd probably look at in terms of assessment is what's the scope and magnitude. So in this case, if we've got six calls...is it used by only six million or is it used by 6,000? So there would be a bit of a notion around what's the scope. Not so much because we would...if it was too small a scope we wouldn't do anything. But just to really try to decide on how quick, how could this get out of control; I guess that's what it would be. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*I certainly wouldn't wanna go and start communicating broadly about the fact that we've got this problem, until I understand in my own mind the dimensions of the problem, and just how extensive it is, and how serious it might be, how many people are involved. So, once you can get a sense of the dynamics of the problem that ultimately helps to inform whatever strategy you're going to take. And here is an example, just looking at the case that you've sketched here, where let's just say you kind of overreact the other way and say, oh, let's air in the efforts of being transparent and ethical and all that kind of stuff, we're gonna issue a press release. Well, I mean you can just imagine the fallout from that, right? You're gonna attract huge amounts of negative attention, and for what? How does it help the organization, when it's only a very small group of patients that have been affected? So you're gonna cause all kinds of reputational problems, you're gonna undermine confidence in the clinicians, etcetera, etcetera. So yeah, you can easily over-communicate it. Chief of Communications, Hospital B, Ontario*

*I don't know necessarily there's a line in the sand, an either/or option. I think it's probably to recognize that there may be a parallel program to do where you know it's behind the scenes, where having you know good communication or dialogue with audiences you know outside of the sort of grand public discussion. But at the same time you know maybe you're ready and willing to be very public should the situation call for it or for that matter, should the media call for it. I don't think there's yes or no, either/or, now's the time to do one or the other but often they're blended and sometimes overlapping approach to it. Director Public Affairs, University B, Ontario*

*In fact, we just disclosed to almost...almost 5,000 people that we had, through a process, compromised their personal health information and you know not one person called the media. Not one person has signaled taking action against us from a legal point of view. Vice President Communications, Hospital F, Ontario*

This section has provided some insight into the various indicators this sample of communicators examined in disclosure situations to determine their recommendations to their organizations about how to respond to a situation. In the preceding data tables they queried what level of knowledge publics may have about the situation and attempted to understand the numbers of people involved in the situation to determine the response. In the next section, further data are provided, which examine how decisions are made about disclosures with respect to the level of risk involved as it pertains to the organization and its business and reputation.

### **2.3 Understanding Risk**

In the four quotes in Table 8 below from the interviewees, they discussed the issue of risk as it pertained to balancing the needs of the organization and its audiences, attempting to deflect

controversy by providing less than full disclosure and weighing the actual level of risk to the health of those involved in the situation.

**TABLE 8: Weighing the Risk of Communicating**

*I think, the bottom line is, again as a communicator, my sort of litmus or gut would be balance, balancing the risk of communicating, and balancing customer needs, but also communicate. Like, you know, you do say something. Even if you don't know everything, you have to say something, and I would err on the side of disclosure. Director, Public Affairs, University B, Ontario*

*How do we see this happening? Given everything that I know, and understand about the environment around us, about what's happening in the world, in the country, in the province, in the city...given all those things, which sounds like a lot, but as somebody who's in this field, you know that goes through your head in a moment. You think, okay, how is this going to play out, how is that going to play out. So my responsibilities are to me, to my employer. If there's a way that I can get a portion of the information out, a minimum amount of information out, and I hate to say this...distract the audience with other information...then I will do that. Vice President Corporate Affairs, Pharmaceutical Company, Ontario*

*So there are all those factors at play, in terms of deciding what you need to do. So in some cases, when there have been minor, the risk has been so low to be non-existent, and there's nothing that can be done anyway, we have chosen to disclose at the next appointment. If we think we can't find people, then we have chosen to public...you know, to disclose to who we can, and then go public looking for those people. Vice President Public Affairs and Communications, Hospital C, Ontario*

*You're probably going to take into account the legal risks and do that assessment and you're probably going to acknowledge all of that and you know cover off those bases as quickly as possible but you're probably not going to dwell on that as much as you dwell on the fact that your customers are going to lose faith in you and that you have to do the right thing and if they decide...and the question is not if we don't say anything will we get away with it. That's one question you can ask. Customers or organizations that are truly driven as customer focused will probably ask the question if we don't tell customers won't it be worse if they find out about it from someone else versus us. Director Communications and Marketing, Corporate Retail, Ontario*

In these four quotes, there is no strong consensus that emerges about how to determine when to disclose information based on the risk to the organization and its audiences. In the first quote, the University Director said he would err on the side of disclosure versus not saying anything about the situation. In the second quote, the Pharmaceutical Company VP seems beholden to her employer and will actually attempt to deflect criticism of the disclosure by presenting another issue. In the third quote, the Vice President of Hospital C suggested that her decision would be predicated on the level of risk that has been assigned to the situation likely by the clinical team. The Director in the fourth quote seemed to want to understand the legal risk and then 'do the right thing' in terms of meeting the customers' needs for information. It may be difficult to determine how the practitioner balances the needs of the organization and those of the public. Ultimately, the communicator may be an employee of the organization and if the will of management is to not disclose, then the practitioner can choose to advocate further to release the information or accept the decision and move on to the next issue. An optimal method of finding a balance may not present itself in this research and the

decision could remain specific to the situation and the purpose of posing the question about the needs of stakeholders in the model may be to ensure that the discussion at least occurs.

## 2.4 Intuition and External Advice

A theme that came forward in the interviews but will not likely make its way into the model is the concept of relying on 'intuition' or 'gut instinct' to make decisions about disclosure strategies.

**TABLE 9: Intuition and Experience**

*If I say something, if we don't say something and what are the possible fallouts. So I kind of have to run through it, run through the scenario in my mind from multiple perspectives but I mean it is intuition. It's your sense of right and wrong, it's your gut reaction in some of these situations where you have no time to really thoroughly analyze every possible variation.* Director of Public Affairs and Communications, Lobby Association, Ontario

*I mean it's very much a gut check. I think I think PR professionals need to have a, what I call a street level, an insight into what's going on at the street level and I think that's one of the biggest things...one of the best qualities that they can bring to the job.* Director of Communications, NGO, Ontario

*Listen to your instincts. Go with your first instincts. I can tell you every time I haven't gone with my first instinct, not every time, but when I've gotten into trouble is when I haven't listened to that little inner voice.* Director of Communications, Health Based Charity, Nova Scotia

*I tend to use my intuition an awful lot. So I think experience kind of counts when you've got things like this that are kind of emerging or where at least...for me I call it my spider sense. You sort of get, there's something in you that tingles that says, from an issues management perspective, this needs my attention.* Vice President, Communications and Marketing, Hospital D, Ontario

*Well, it's...I guess it's...intuition's probably a fairly good way of putting it. Sort of having a look at what's happened in the past with these types of issues, and there really isn't a cut and dried thing to say if it's X number of patients, and Y impact, then we will do A, B, or C. It's sort of going on a gut feel. With the number we're talking about, 250 patients, being something...cancer is...everyone knows someone who's been through this. It's in everyone's family or friends, so there's a lot of general public interest. So this is one of those things where, going on gut feel I'd say, "Yeah, this has got some potential to go somewhere, so I'd like to sort of take it up the next notch." And it really is sort of a blend of intuition and experience right at this...Director of Public Relations, Health Authority B, British Columbia*

*I think the sense of intuition comes from knowing the business. So I think one of the things...one of the reasons I think that seasoned communicators seem to have better intuition is because if they're good at what they do, and if they've been with the organization and they're at a good level, they understand the business. So I think that one of the things about how would you would decouple that intuition is really very much about understanding the business itself, and also I would say, understanding the people, like the actual stakeholders.* Vice President Corporate Affairs, Insurance Company, Ontario

Based on the feedback from the interviewees in Table 9, the use of an 'inner-voice' or what Bourdieu (1990, p. 66) described as a 'feel for the game', appeared to be vital to working through these issues but describing this on a model may not be possible but it is important to note that this is part of the decision-making process communicators use in these situations. One solution to the illustrative challenge of demonstrating the concept of 'common-sense' may come in the second portion of this section that mentions the significant value communicators in the study placed on contacting colleagues for a 'second opinion' or the need to have an objective opinion of someone who is removed emotionally and professionally from the situation. Although the notion of relying on an

intuitive sense may seem abstract and difficult to quantify, it is not without precedence. There has been interesting research and commentary on the idea of using intuition in professional practice. Indick referred to 'gut instinct' as the use of 'non-empirical approaches to arguments' (Indick 2002, pp. 26-27) and Bourdieu (1990, p. 66) discussed the idea of 'practical sense'. In both examples, the authors explain how professionals draw on their experience to make quick decisions about situations without the aid of comprehensive research or other data to assist them in making choices about a situation. Instinct is discussed in more detail in Chapter V, (p. 199).

In the final quote from the insurance company VP, the respondent explains that having experience in the industry and familiarity with stakeholders as two of the factors that lead to not only hearing your inner-voice but having the confidence of listening to it to guide practice. Rooting the decision-making inklings of communicators in their level of knowledge with their employer's or client's business may be the best way to describe the inner perception the people in this study mentioned as being critical to their handling of disclosure situations.

In addition to listening to their 'inner voice' for guidance, some of the interviewees also mentioned the importance of getting an objective opinion from a trusted advisor or an outside source to provide further validation for their gut-feelings (see table below).

**TABLE 10: Get an Objective Opinion**

*You know if you've not done it before or you're facing something that you know you could use some sober second thought about or whatever it is I think you need to tap into that. I think that's why in our profession the value of the network of similar kinds of professionals can be so valuable. There's always someone who's done it before and there's always someone who has been challenged with similar things and even if that's not the case a different kind of perspective can help guide the process. Vice President, Health Authority A, British Columbia*

*You know there's been lots of times when I've called people external to the organization when something's playing out or even if we're preparing for something and say: "How does this sound to you," or "How might that play if we do it this way or have you seen it done before?" And that's always a very helpful thing the outcome of disclosure is really a win/win in the sense that the ethical accountability of doing the right thing plays out but you know the knee jerk of oh no, we're going to get the terrible headline or the lawsuit or whatever does not play out and that's typical. Vice President Communications, Hospital F, Ontario*

*My litmus test a lot of times is my husband who's not in the communications business. He's your average person who's out there in the marketplace listening to everything coming at him and you know often times I'll bounce things off of him. Director of Communications, NGO, Ontario*

*You know I'm sure there...one of the things that I think is really important to have in this business is mentors and I've certainly had them over the years and I bounce stuff off of them all the time. I've mentored people and I get calls from them all the time asking how would you do this or what do you think about this and some of them who've been in the business for quite some time but just because it is such a tricky situation it never hurts to get a second or third opinion from others to say how you know how would you handle this. You don't have to go into a huge amount of detail or break any confidences but certainly they'll understand the gravity of the situation and I just think you can't go wrong seeking advice from somebody who's you know who's dealt with similar situations. Chief Communications Officer, University, British Columbia*

In the four quotes above, the interviewees mentioned that they look from a variety of external sources such as spouses, mentors and colleagues. As a step in the model, it might be appropriate to include a section where the communicator is prompted to contact someone external to the organization to determine the validity of their recommendation and strategy. This could involve checking the messaging to ensure it is sensible and is free of corporate jargon for example. It could also involve some reassurance from a colleague that what the communicator is recommending in terms of a strategy seems to resonate with someone with an objective opinion.

Deciding what to do when presented with a disclosure situation involves a number of inputs from a variety of sources. As demonstrated thus far, communicators look to primary and secondary sources, they consult expert advice and listen to their 'inner-voices' and seek collaboration with colleagues and in some cases friends and relatives to determine the best course of action. According to data in this thesis, gathering information from a number of areas can assist the organization in making a decision about the best direction to take with the disclosure. In addition to the importance of having the necessary facts, figures and 'gut-checks' about what to do when confronted with disclosure situations, making a choice about pursuing a disclosure strategy can include questions about the



ethics and values of the organization and those involved. In the next section, the feedback from interviewees about the role ethics plays in decision-making is presented.

## 2.5 Ethics and Personal Values

There were a number of responses interviewees provided when asked about ethical decision-making and the factors they would use to contribute to their processes of providing a recommendation about communicating the disclosure situation. As seen in Table 11 below, participants seemed to draw on several moral frameworks to make decisions about disclosures.

**TABLE 11: Ethical Decision Making**

*So if there's a medication error for example, or some other kind of medical error, we absolutely...our principle is to disclose to the patient. We would not necessarily disclose publicly, because there's...what's to be gained from that? If there's a particular incident that happened and it has, say a very negative outcome of an individual. That individual has the right and needs to know about what happened. Does it serve any greater public good for the whole world to know about that? I would suggest, in balance, not necessarily.* Vice President, Communications and Marketing, Hospital D, Ontario

*So, from my perspective...and it would help by the fact that we actually have kind of a vision in it, and a mission statement. But for us, our guiding principle in this would be to actually do the right thing for Canadians. And so, we do actually have that kind of the guiding principle.* Director Communications, Pharmaceutical Company A, Ontario

*But if there's one principle I'd always, it would always be that question to say okay you know six months from now at the traditional inquiry and I'm sitting on the stand and they say you know, "What did you know and when did you know it and what did you do about it," am I going to be able to answer that in a way that you know that personally you feel good about but also balance that against what was best for the institution and the organization?* Director Public Affairs, University B, Ontario

*Or, would I prefer a physician to come to me and say, XXXX, look, we made a mistake, you know, we're really, really sorry, it's just one of those things that happens but be reassured it's not gonna affect your treatment, or it's not gonna harm you in any way. It was just a little hiccup, and, you know, this is what happened, this is what we're doing about it, and, you know, we just apologize for that. So, would I prefer that approach or for the hospital never to have even told me about the mistake? And I think I would prefer, for me personally, I would prefer for the hospital to come and tell me that there was a mistake and to reassure me, particularly from the clinician's side, that there's obviously not going to be any further problems or issues associated with that mistake.* Chief of Communications, Hospital B, Ontario

*My responsibility as a human being, my first responsibility is to myself. To make sure that I am comfortable with whatever it is that I'm doing. That my...whoever I'm working for is not asking me to do something that's unethical. So if it passes my own ethical litmus test, then my next responsibility is to my employer. And what is that...what is the employer's goal? What are the implications of scenario A versus scenario B, and trying to roll it out one hour, one day, one week, one month, ten years down the road, what are the possible implications?* Director of Communications, Provincial Government, Nova Scotia

*It's different every time. There is no magic bullet and I do think what I found when I'm facing that type of decision is I have to put myself in the shoes of the person on the other end of the table.* Director Communications, Health-based Charity, Nova Scotia

In the first quote from the VP of Hospital D, the participant made reference to a 'principle' that would guide her decision-making about the disclosure. The second and third quotes above from the Pharmaceutical Company Director and the Director at University B, also mention the word 'principle' and it may be worth having the communicator refer to her company's code of ethics (assuming one

exists) for example to see if there is specific language that covers 'transparency' or 'disclosure'. The first quote from the VP of Hospital D, also mentions working toward a 'greater good', which is similar to the 'greatest happiness' principle found in the utilitarian approach to ethics. As L'Etang (2006, pp. 405-406) suggested, utilitarianism is 'the greatest happiness for the greatest number' and for a utilitarian, 'good' is defined as happiness and a right action is that which increases happiness by at least as much as any other option open to the agent at the time. There are elements of virtue theory in the third and fifth quotes above from the Directors at the University and Provincial Government. Heichelbech (2003, p. 45) described virtue theory as a person's character including their actions and how someone is predisposed to respond to situations regardless of regulations or rules. The Director at the Provincial Government seemed to put her own sense of right and wrong first and then her employer's demands second. Communicators who prioritize their decision-making in this fashion may have a conflict situation arise when their personal values collide with those of the organization. Finding a resolution in these situations may not be obvious or easy to do. In the fourth and sixth quotes from the Chief of Communications at a Hospital and the Director of a Health-based Charity, the interviewees seemed to draw on aspects of the 'golden rule' or deontology, when they said that his decision to disclose would likely be guided by what they would like to have happen if he was in a similar situation. The relevance of three moral frameworks, deontology, utilitarianism, and virtue theory, to disclosures is discussed in greater detail in Chapter V (p. 130), however, as Sherwin (1999, p. 202) points out, each moral theory has a definite appeal to various situations and there may be opportunities in disclosures to employ elements of all three frameworks.

There may be limitations to using a single moral framework as a disclosure strategy. As mentioned in the Literature Review (p. 187), Maclagan (1998, p. 26) looked at the concept of rationalistic ethics and consequentialism and non-consequentialism. The consequentialist position requires people to consider the outcomes of their actions to make a decision whereas the non-consequentialist view follows a course of action which is intrinsically right, irrespective of the outcome. This reasoning is based on a sense of duty which would be consistent with what Heichelbech (2003, p. 45) described as a deontological approach. When making a decision about disclosing information, the non-

consequentialist would most likely offer full disclosure of the organization's information without taking into account the damage the information could have on the company's reputation or possibly how audiences could perceive whatever is being communicated. A consequentialist approach would make disclosure decisions based on the outcome to the organization and its audiences. The challenge with a pure consequentialist strategy is that if the information could cause significant damage to the organization such as costly litigation, then the tendency may be to stifle the release of any information which could be harmful to the organization but helpful to those affected. Likewise, a pure non-consequentialist communication strategy could cause unnecessary damage to the institution and possibly to the audiences if the impact of the disclosure is not considered. Ethical decision-making is integral to the model developed in this thesis. The topic is explored in more detail in Chapter V (p. 188) and again in Chapter VII (p. 288).

## **2.6 Summary**

In this section, the initial steps that may appear in the disclosure model were discussed and evidence was provided related to research question one: *what types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?* With respect to the first part of the research question, the data presented here suggested that communicators in this research used a number of different methods to assess what situations would be disclosed. There was evidence provided that anything that posed a risk to the stakeholders and public could be disclosed and the decision to do so would involve the advice of internal and external experts and consultation with their colleagues in the organization. There was mention of conducting some research such as internet searches to determine any precedence around the situation and how something similar may have been handled in the past. There are data offered on the use of intuition to gauge the response to a situation and commentary was provided on how personal ethics may play a role in determining what information the organization should provide publicly. Participants provided data on how communicators ascertain what has happened and how they tap into various internal and external networks and sources to provide background for further decision-making. In the next section, there are more specific data that relate to the latter portion of

the research question regarding how the disclosure events are communicated. There are data on whether or not the organization should be 'proactive' in communicating about the situation, how publics are segmented and reached with specific messaging and what constraints communicators encounter and how they overcome them, as the disclosure plan continues to take shape.

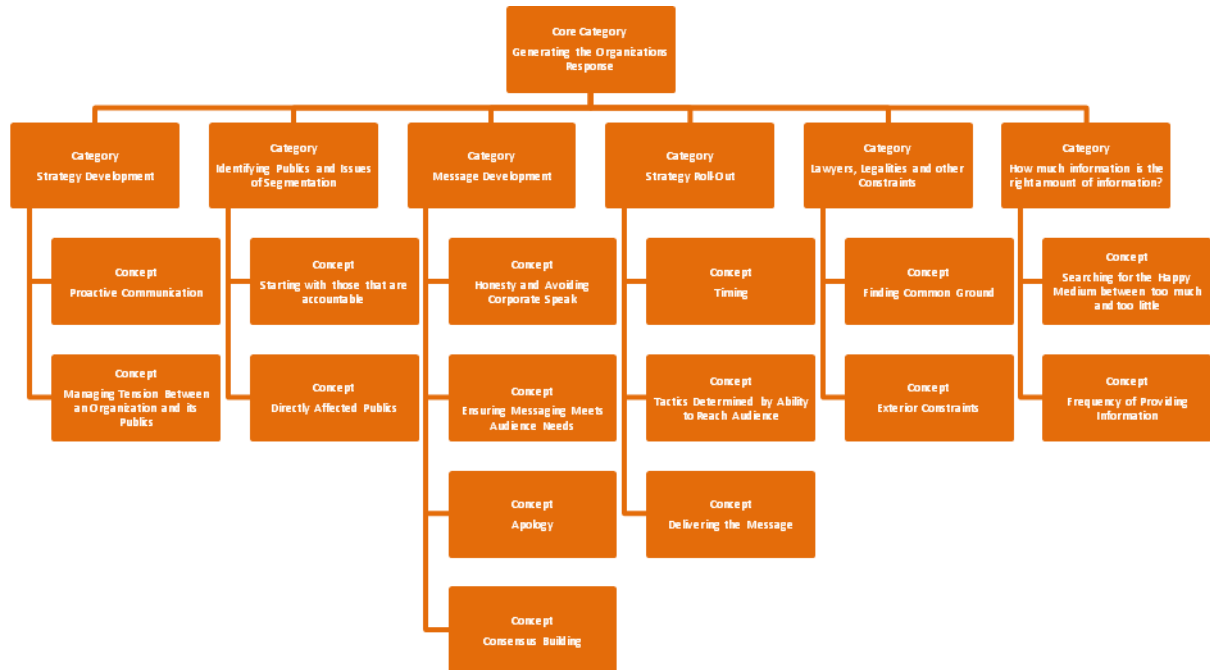
### **3.0 GENERATING THE ORGANIZATION'S RESPONSE**

In this section, data are provided that related to research question one (*what types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?*) and research question four (*when involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of publics?*). The interviewees spoke about their process for developing a communication strategy, how they would prioritize audiences, construct messages, and conduct the tactical roll-out of their plans. There are six categories that emerged in the data for this section (please see schematic of categories and concepts below):

- 1) Strategy Development
- 2) Identifying Publics and Issues of Segmentation
- 3) Message Development
- 4) Strategy Roll-out
- 5) Lawyers, Legalities and other Constraints
- 6) How much information is the right amount of information?

This section provides the data for the portion of the model that deals with practical considerations regarding communication strategy such as how audiences would be reached and the timing and tactics used (Chapter VI, pp. 229-240).

**Schematic of Core Category Two: Generating the Organization’s Response**



**3.1 Strategy Development**

In the quotes below in Table 12, one of the themes that emerged was the need to be ‘proactive’ with disclosure strategies. The term ‘proactive’ in this context meant ensuring that the organization was the first to bring public attention to the matter as opposed to being ‘reactive’ and having the situation disclosed by another organization. This is similar to a concept mentioned in the Literature Review (Chapter II, p. 69) called ‘stealing thunder’ which is based on the courtroom legal strategy of encouraging a witness to disclose any nefarious information before it can be drawn out under cross examination (Arpan & Roskos-Ewoldsen, 2005, p. 426). One of the reasons the participants (quoted below), mentioned for wanting to be proactive was the notion of maintaining control over the story by being the first to release it. As the Director for the Health Authority said: ‘Define or be defined’, which refers to the organization taking an opportunity to define or explain the issue publicly, ahead of someone else doing it for them. Attempting to control messaging in disclosure situations may be

difficult to do. When the organization delivers its disclosure messages to its publics, the organization is at the mercy of its stakeholders in terms of how audiences interpret the story and how it is reported in the media. In some cases, the company may have the luxury of time to decide what information to release but once the story is disseminated to various audiences, the organization loses whatever control it may have had with the information. The important point to emphasize here may be one of caution for practitioners to avoid setting unreasonable expectations within their organizations that they will be able to control the messaging and stakeholder interpretation once the information has been broadcast to a mass audience.

**TABLE 12: Proactive Communication**

*Tell it all, tell it fast, tell it truthfully.* Director, Public Relations, Health Authority B, British Columbia

*I really don't think there's any benefit to trying to not talk about something because it'll get out there and then it will become something you respond to. So be proactive about it so that you control the situation and you control the information flow and you look as though you're doing your job well in the interest of all your constituents because otherwise you're going to look like you're catching up.* Director Communications, Provincial Government Nova Scotia

*If you get a call before you're absolutely ready to go with the media then I think you become quite aggressive on it and you say: "Yes, we're going to issue a new release. Here's what we've got in the works," and step up your actions in terms of contacting the affected individuals* Vice President Communications, Hospital F, Ontario

*So I would sort of be, if not literally mapping out different scenarios, at least thinking about, "Okay, if this happened, what would we do? If this happened, what would we do? If this happened, what would we do?" And then, "Okay, what can I get prepared?" Is it a statement, a core statement that could be quickly put together if we needed to be proactive and go out?* Vice President Communications, University, Alberta

*If there was a high degree of rumour out there, on campus or off campus, or among alumni, then certainly I would want to get out there very quickly, in a very public way, with a lot of tools that are really, sort of mass communication types of tools. Otherwise, if there hadn't been a declared sort of viral outbreak, I would probably limit it to those people directly surrounding the students who'd been affected* Vice President Public Affairs, University C, Ontario

*My overall process on these types of events is, I try and live by the motto of define or be defined... We've got 22,000 employees, so there isn't really a whole lot that is internal that doesn't get leaked by someone. But if it's something that we know is going to get out there, nine times out of 10, I'd prefer to be on the front side of that and control the message for at least the first kick at it when it's out there in the public as opposed to reacting to it.* Director, Public Relations, Health Authority B, British Columbia

*This is a challenge and I'm sure that we all face is that folks who aren't in the communications industry or aren't communicators within their own portfolios, will often think the first step is let's batten down the hatches and let's not let this get out. I tend to push more the other way. Get out there, get in front of it, control it, explain...it's all those classic things right. Mess up, fess up, dress up and move on.* Chief of Communications, Lottery, British Columbia

*So, instinctively I think there is that kind of ostrich mentality that everyone has. I don't care how many policies and how transparent you're going to be, some of this instinct is, "I'm just going to hope it goes away." So I think instinctively, it's kind of like a, you know, it's that fight or flight thing.* Vice President, Corporate Affairs, Insurance Company, Ontario

Another piece that is interesting in the quotes above is reference to the indicators the communicators used to determine how 'proactive' they would be with the situation. In the third quote from the Hospital VP, the key indicator here for a broad communication response is media interest. In the fourth quote, the VP for the University contemplated a number of different scenarios and prepared a

statement to release if the need arose. The quote from the VP at the Ontario University said she would be sensitive to the amount of rumour that was 'out there' about the situation. Her reasoning is similar to one of criterion Kaufman, Kesner and Hazen (1994, pp. 35-37) mentioned when they suggested that companies should consider disclosing information if the 'fictions surrounding the crisis are worse than the facts' (Chapter II p. 76). In the model, it might be worthwhile to conduct an 'environmental scan' for example to determine what is being said about the issue or the organization. This could include some media monitoring, a quick internet search or touching base with stakeholders to see what is known about the situation.

In the second quote above from the Director with the Nova Scotia Government, she made reference to acting in the interests of constituents. This is similar to another theme that was raised with this category, which was how communicators can manage the interests of their organizations and the needs of the audiences for information and dialogue in a disclosure situation. When recommending a strategy, the communicator may want to be aware of the needs of her organization and to see if it is possible to balance those with the expectations of the stakeholders (shown in Table 13 below).

**TABLE 13: Managing Tension between an Organization and its Publics**

*But that tension is never gonna go away. And I think that that tension is perhaps even more evident in the private sector, where the common interest between the organization and its publics will never, ever be, always on the same plane. It can't be, because you're going to have objectives and goals of the organization which a lot of groups may not like, and they may oppose for any number of different reasons.* Chief Communications, Hospital B, Ontario

*There's always a level, a fairly good level of tension between the community, that has certain expectations of the corporation which the corporation tries to address by embarking on social responsibility programs, but never quite gets there because there's just that level of tension that's there. There are different expectations, there are different requirements, and fundamentally there's different interests at heart.* Director of Communications, NGO, Ontario

*So, it's...the information needs of the current audience, future audience is this thing is a broadly used drug. And with XXXX though, you have to balance, the cushion here is balancing the organization's objectives. I think it's also balancing with what we're required to do legally and from a regulatory perspective in terms of releasing information.* Director Communications, Pharmaceutical Company A, Ontario

This idea of balancing both the interests of the organization and its stakeholders raises the concepts of symmetry and transparency and whether or not they can be achieved. These ideas were discussed in the Literature Review with the Coombs and Holladay (2009) concept of constituents determining an organization's transparency, Heath's (2001) rhetorical enactment theory and Grunig and Hunt's (1984) two-way symmetrical theory, where an attempt is made to create a dialogue with both the organization and its audiences. The first two quotes from the Communications Chief of

Hospital B and the NGO Director, in Table 13 above mentioned the 'tension' that exists between the organization and public and perhaps the role of the communicator is to somehow look to build bridges to ease this and ensure open dialogue can take place during disclosures and in periods of relative normalcy. In the Literature Review (p. 87), Holtzhausen argued that the role of public relations practitioners is to identify 'tensors' between the organization and internal and external publics and to create situations in which new meaning is produced (Holtzhausen, 2000, p. 107). The Hospital Communications Chief mentioned that the tension is never going to go away between an organization and its publics due to the fact that they have different objectives. Maybe the tension does not have to dissipate but there could be an opportunity for both the organization and its publics to achieve something out of the situation. Murphy's (1991) 'mixed motives' model (cited in Plowman, Briggs and Huang, 2001, p. 302) may apply to the quotes above, where she mentioned that each side in a stakeholder relationship retains a strong sense of its own self-interests, yet each is motivated to cooperate in a limited fashion to attain at least some resolution. In a disclosure situation, the organization and public may not agree on the optimal solution but by keeping their self-interests they may be able to reach an agreement on the issue and the role of the communicator may be to help broker this situation. In the third quote, the Pharmaceutical Company Director, mentioned that there is a need to balance the objectives of the organization with those of the public and perhaps what the organization is obligated to do by law. The relevance for a disclosure model may be for the practitioner to work with a number of factors in mind that need to be 'balanced' and set expectations in the organization that the goal of the communication strategy may not be to win support for the issue but rather the goal may be to achieve a mutually beneficial agreement on the situation between the organization and the public.

### **3.2 Identifying Publics and Issues of Segmentation**

In Table 14 below, it is clear that the interviewees have some method of prioritizing audiences in these situations. One person commented (VP for the pharmaceutical company) that she used a formal 'checklist' of people to notify when something needs to be disclosed. The quotes below demonstrate that there seems to be an obligation to ensure those who are accountable for the



situation receive the information first such as the board and senior teams and in some cases government officials. Those who are accountable for the situation did not appear to be limited to internal audiences. One of the interviewees (Director for an Ontario University) contemplated informing a professional association. The other point that two of the participants (both VPs for Hospitals) mentioned was the importance of informing employees prior to any public release of the information. From the data below, a theme seemed to be the idea of creating informed constituencies who may have to respond to the situation (board, senior leaders, government, and employees) before communicating with those who may be directly affected by the situation.

**TABLE 14: Starting with those who are Accountable**

*I think for sure, we'd be...well, my focus would be internally right away, because as I've learned in the hospital environment, if the internal people aren't organized, the external piece is going to fall apart. So, for sure, the CEO or the business head. For sure, medical and drug safety; for sure, quality assurance, and for sure, again, in the XXXX case, we're a global company so our global parents, for lack of a better term, would need to know about this. So that the internal key stakeholders are aware. Director of Communications, Pharmaceutical Company A, Ontario*

*So first the senior staff, then all staff, in a very tight way. If it gets to be this extensive, and you're going to be doing something proactively to media, there might be some key officials that you need to just FYI about what's occurred and the processes you're putting in place to make sure it doesn't happen again. Even board, probably key board and foundation members, because that will definitely be something that will come up, and they need to know how to respond externally. Vice President Communications, Hospital F, Ontario*

*Well, we just kind of know our priority audiences I guess. We work really closely with the provincial government. On any given day, we have daily media issue calls with the government, all of the health authorities, and the government public affairs bureau. We have a call every morning where we talk about the issues that are in the media that day. We really try and have kind of a system response to those things. So the bottom line is government is a huge audience for us. So they need to know that we're on top of the situation. What our plan is for communications, what our messaging is. Vice President, Public Relations, Health Authority A, British Columbia*

*Our Board...from an internal management perspective is a very involved Board. And so we always make sure that they are totally informed about what's going on...that sort of thing. And then really, it's getting into the real audience of the actual patients who experienced the error, and the impact of that, and the public. Director of Communications, Health-Based Charity, Nova Scotia*

*Yeah. I would say we would do governance...so yeah, you could call that sort of the governance level...Board and government in terms of an update, and the strategy and the messaging, and then actually rolling out to the...I guess sort of the primary audiences actually impacted by the error. Chief of Communications, Hospital E, Ontario*

*I'd sort of probably role it out as the...our internal team needs to know so that they can make a decision then as far as containing a situation on campus it's whoever's affected so if it's a building etc then you know all the students and all the faculty at that one particular building need to be aware. We would advise the rest of the campus what's going on right away and probably simultaneously would have another chunk of the team talking to the health authority. Chief Communications Officer, University, British Columbia*

*I'm wondering if the professional association needs to know about it and needs to participate sort of licensing side of it and make sure that they all understand what's going on and then not kind of cascading down from that would be the media and then the public through media to understand. Director Public Affairs, University B, Ontario*

*We actually have a checklist, so that always helps us. And so, in terms of this, the very first people we would call would be Health Canada, because by...what we'd heard is that we've actually got these sort of six adverse events that have just been reported so we would make sure that before anything else happened...we've only got a 24 hour window to actually report those, and so that would absolutely be the first...so that's kind of the first thing is, let's make sure we report these things, and don't get so hung up on solving the crisis that when the reporter calls Health Canada they go, "We don't know anything about these." Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*I guess the only other thing that I feel real passionate about in terms of a culture thing, is that employees hear this first. Because that is the biggest thing that I really think...because this has to happen. And I think I just put it last on my list, but that would be one of the other things is that, let's make sure the employees hear about this before it gets somewhere else. My rule always is make sure the employees know everything first. And that's one...depending on how the communications group is structured, that can be easily done, if it's all in the same area. Vice President, Communications and Marketing, Hospital D, Ontario*

*And then I guess the other checklist is for me, are all the audiences who are going to be pissed off to wake up and read about it tomorrow in the Globe, have they been informed? And that would include our Board, our senior management team...depending on what it is...well really, the senior team I think, and then our Foundation Board. And also, I do a fair amount of work...we do a fair amount of work with the Minister's office. Vice President, Public Affairs and Communications, Hospital C, Ontario*

L'Etang (1995 p. 125) raised a caution about stakeholder analysis in general that is worth mentioning here. Since the need in a disclosure situation is to prioritize publics to ensure information is provided to the people who can manage the event and ensure publics are supported, care should be taken to

avoid jumping to a stakeholder analysis that may be biased toward the interests of the organization and subsequently overlooks an important audience that the event may impact. Stakeholder analyses should avoid only examining management's perspective of the formal relationship between the organization and its audiences (L'Etang, 1995 p. 125). In the model presented in this research, a tool will be presented that will consider the need of an organization to prioritize and identify publics with the needs of audiences for information (p. 215).

Segmentation and prioritizing theories were discussed earlier in the Literature Review (pp. 78-84) such as the Grunig (1992) approach of classifying groups into latent, aware, active and non-publics. To prioritize these segments, Grunig and Hunt (1984) presented situational theory, which categorized publics into their ability to recognize the problem, their constraint to act or do something about it, and their level of involvement with the organization or issue. Situational theory has been criticized for its over-emphasis on reactive public relations practice and the focus the approach places on active publics with disregard for emerging audiences which could present either a challenge or a potential ally to an organization when executing communication strategies (see Jahansoozi, 2006, p. 65). Based on the data collected and the emphasis on informing 'accountable' audiences first, rather than active publics, Grunig's (1992) method of segmentation may not be the best approach for the disclosure model. Although Grunig's (1992) situational theory seems to suggest that publics move from latent to aware to active as they become more affected by the organization or issue, the approach does not offer advice on how to mitigate the migration of audiences from latent to aware to active. The organization may be able to work with a stakeholder group through these phases to dissuade a public from taking a hostile stance as it becomes increasingly informed about an issue. It can also be difficult to forecast how publics will respond to the issue and labeling one as 'aware' is not necessarily an indicator that the group will move to active when provided with the disclosure communication. Beyond the nature of the existing relationship between an organization and its publics and in the absence of any primary data from audiences to gauge their reaction to the news, which is not impossible to obtain but perhaps difficult, it can be challenging to predict with any certainty in strategic planning how the audiences will respond.

Moving from informing internal audiences and those who are accountable for the situation, to those who are directly impacted by the information, the quotes from participants in Table 15 below provide evidence that the communicators thought about the process of prioritizing people in similar ways. The terms 'spider web', 'grids', 'concentric circles', were used to describe how they would assign a level of priority to the audiences who would be reached with the disclosure communication. In the second quote below, from the Hospital Vice President, the concept of risk is discussed. The VP mentioned that those who were at risk would be the first to receive the information. This sentiment was shared in several other quotes below. An important point is found in the third quote, from the Director of PR with the Health Authority, who made the statement about answering questions that the affected group may have about the situation. The fourth quote from the Director of Marketing and Communications of a Retail Chain, also said the organization should try to have a 'one-on-one' discussion with the most affected group. These quotes allude to the concept of generating dialogue between the organization and the affected public as opposed to the disclosure being pushed out from the organization without any attempt to create a two-way flow of information.

In the tiered approach that participants described below, they would move outwards from the most affected groups to those who may have less of a direct connection to the organization or issue. The Director of the Retail Chain, described these groups as a 'second' or 'third-level public' whom the situation may not affect as much as the primary group. Grunig (1992) labeled these as non-publics who are not necessarily connected to the situation but may have a sense of curiosity about whatever is happening. This group could be of interest to the organization and considered in a 'non-affected public' such as potential customers. These audiences may not wield the same amount of power as a regulator or well-organized pressure group but they could represent those who choose not to use a company's products or services after losing confidence in how a disclosure situation was managed.

**TABLE 15: Directly Affected Publics**

*The most important thing at the end of the day is your patients and how you communicate to those individual patients, because they're the ones that were personally affected. They're the ones who you have to be open and honest with. So if you're focused on how to best communicate to those individual patients, then things kind of flow out from there. So obviously, I think the media are very high on the priority list...it's the most effective way to manage your message and to get the information out accurately and proactively.* Chief of Communications, Hospital A, Ontario

*When I think of prioritizing, I think about people first and are people at risk? In my head, I sort of visualize a bit of a spider web with (those affected) at the middle, and I think about who's in contact with them.* Vice President Communications and Marketing, Hospital D, Ontario

*I mean the principle around that I think is that the person...the people who have the right to know the information are the individuals involved. They have the right to know what happened, what actions have been taken to stop it from happening again. And really any questions that they have about it.* Director Public Relations, Health Authority B, British Columbia

*Let's say for example, that you were taking a very value-driven sort of disclosure you know inspired approach whereby you believe that this is absolutely something that you should let people know. Well I still believe that those people that are most affected need to know if it's possible to isolate them, they should have the very first understanding and one on one discussion or whatever format that is. And then secondly I think your customers probably in the online world and there's various vehicles of communication you can use to get to them whether it's an e-mail listing that you have or it's a database of your users, that sort of thing. And then I guess the third level of public would be your general customer base so if you're a company that has both bricks and mortar and online, that sort of thing, then you're probably going to want to let your general customers know as well. And again, I think that they're driven by that assessment but those are the audiences that I certainly identify initially.* Director Communications and Marketing, Corporate (Retail Chain), Ontario

*The information needs of your audience is that tiered approach. Obviously the 100 people who have their profiles compromised, their needs are far more urgent than somebody who has maybe used your company maybe twice in the last couple of years or something like that and they're not compromised so it's the realistic prioritization and the fact that you know you really have to get those requirements taken care of first of all and then you sort of start addressing your secondary or tertiary requirements that to come clean and say you know: "This went on and we want you to know about it but you're safe now," or those types of messages.* Chief of Communications, Lottery British Columbia

*I've used grids in the past and I think I would colloquially calling it a most affected grid. So who are the audiences who would be most affected? And I would measure it that way. So, for example, employees...the most affected first. So, in other words, if you are a front line call centre person, and you're going to be taking calls from the customers, we would obviously need to update them first. Is there a Board of Directors for the company? So do that due diligence as well. And then go on to the affected customers and all customers, Joe Public through public relations, but I would look at who would be most affected first.* Vice President Corporate Affairs, Insurance Company, Ontario

*Well, I guess I would look at it in terms of perhaps concentric circles. I would probably start really small and as need expand. And in a way, if you look at sort of like a classic crisis issues and management model, and if you look at red light, yellow light, green light...green light is your monitoring, yellow light is you've got an issue...something has emerged, and then crisis is full blown.* Chief Communications, Hospital E, Ontario

In summary, evidence in the tables above have shown that audiences who are accountable for the situation are informed first, followed by those who are directly impacted. Once these audiences are informed, the organization could turn its attention to communicating the situation to those such as news media who may wield influence over the perception of other groups who are not necessarily connected to the situation but may be a concern for the organization such as future customers. Finally, the interview data suggested the last public the organization will want to consider reaching in some way will be those who are not necessarily affected directly but who could have some impact on the success of their company's business such as potential consumers. In the development of the

model, the segmentation process mentioned here has formed a unique approach to sorting audiences known as the 'disclosure stakeholder pyramid' which is presented in Chapter VI (p.215).

### **3.3 Message Development**

There four main concepts that emerged under this category: honesty and avoiding corporate speak, ensuring messaging meets audience needs, apology, and building consensus in the organization for the disclosure messaging.

As mentioned in the Literature Review (p. 75) Pratt (2004, p. 19) contended that the value of messaging from an organization is diminished in the minds of receivers if the information is largely an outpouring of self-aggrandizing good news. Similarly, 'truth telling' emerged as a theme in the study when participants spoke about developing the messaging for their disclosure plans. In the Table 16 below, the Hospital Vice President, mentioned the idea of 'trying to do the right thing' in her messaging by admitting if a mistake was made and not trying to cover it up. In the second quote, the Director for the Retail Chain suggested that honesty and the corporation's objectives, vision, mission and values should guide the messaging. In the fourth quote, the Director of Public Affairs for a University commented that a disclosure has to happen in the 'spirit of goodwill and cooperation' with audiences and that the organization has to be truthful. It was mentioned in the data provided below, that organizations should stick to the facts and avoid 'marketing speak' as the Director of Communications for a Retail Chain said. The Director for the Health Authority also stressed the importance of sticking to the facts and wherever possible provide detail about what the organization is doing to resolve the situation. Based on the data in Table 16, honesty in messaging and keeping the information as factual as possible is integral to the process of communicating the organization's response to the situation. When describing the development of messaging in a model, it will be important to advise people to gather the facts and resist temptation to add self-promoting content when communicating with audiences.

**TABLE 16: Honesty and Avoiding Corporate Speak**

*I think I genuinely think people will believe you if you try to do the right thing. You know it might be the Pollyanna in me but I do think it's worse to try to pretend that you haven't done something than to just come clean and say we made a mistake. Vice President Communications and Marketing, Hospital D, Ontario*

*I think I would go back to your values, your corporate objectives and your vision, mission and values as every well established organization has those and should be either guiding principles so if you're formulating messages I think that there's the criteria has to be honest; the criteria has to be it has to be clear and I think that the criteria has to be, it can't sound like marketing speak and you can't turn this bad situation into a positive. I think you just have to acknowledge it's a bad situation and let the honesty speak for itself and that's the first sort of, when you're looking at the criteria that's sort of the way I would you know sort of think about it. Director Communications and Marketing Corporate (retail chain), Ontario*

*It's not about airing your dirty laundry and just sort of exposing how poor of a performer the organization of the hospital might be. It's about saying that this stuff happens and sometimes things go wrong. We want to learn from that and add it to the pile of things that we learn from and keep going. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*So I guess I'm thinking that disclosure, it really has to occur within a spirit of cooperation and good will. I mean we have to be truthful, we have to be seen to be truthful, and the information that we disclose, it can't seem forced or done under some sort of obligation. It has to be very humane. It has to be very real. Director Public Affairs, University B, Ontario*

*I'm a believer in we share the facts, this what it is we found out, how we found out, what we're doing about it, what we're going to do about it and when's the next time we're going to tell you what we're doing about it. These are the facts and this is what we're doing about them so that if anybody looks at what we're doing they can't criticize us in any way responding inappropriately. I want us to be seen as honest, I want us to be seen as forthcoming, not spinning and those types of things. Director Public Relations, Health Authority B, British Columbia*

*I guess my first reaction is kind of to walk in the steps of those that have been impacted and say okay how can we rectify this with each one of those stakeholders and how can we first of all communicate it, secondly apologize for it and thirdly, how can we rectify it or prevent it from happening again. Director Communications, Health-based Charity, Nova Scotia*

*When we've dealt with these kinds of things the communication that occurs often is very sensitive; sensitive in the sense that we have recognized that the information being provided to a patient could be concerning or causing anxiety or whatever it might be. But your messaging should be pretty tight, and the tone of things needs to be in context of where it is. You know, no one knew, people didn't die, it was...there was a system that was in place, and they found that error very quickly...so there are some positive messages to communicate. Vice President Communications, Hospital F, Ontario*

In Table 16, the quote from the Director at the Health-based Charity, is about the practitioner, putting herself in the place of those who will be impacted with the messaging. While this quote was captured under the 'Honesty' concept, she provided another quote in Table 17 below that led to the development of a separate concept that referred specifically to 'ensuring the messaging meets audience needs.' In Table 17 below, she mentioned the importance of getting the opinion of those who will be receiving the message in advance of sending it. Her quote suggested that other communicators or people in the organization may be 'reluctant' to get this due to legal or other constraints but the idea of involving a public in the development of the strategy could be key to ensuring messaging meets the needs of the intended audiences. In the other three quotes below, there is recognition that different audiences have varying needs for information. The more the

message can be tailored to the needs of an audience, the more effective it might be in answering their questions and helping them make an informed decision about the situation.

**TABLE 17: Ensuring Messaging Meets Audience Needs**

*I think it's always important to get the opinion of the patient and I know some people would be reluctant to get that because you know with the fear that okay there's a whole potential legal piece to this and protecting the hospital and the organization but I think that you need to involve the public that is impacted and in this case that would be the patients so the patients that were affected and potential patients so I think I'd have them as a source. Director of Communications, Health-based Charity, Nova Scotia*

*I think there's a long answer to that question about how to formulate the messages and it's a process of thinking through you know all angles of the communication would help land the messages and if ...and of course then you're thinking about stakeholders as well. There would be some messages that are very obvious and consistent for all audiences but there are others that may be customized for audiences so a patient may have a set of messages coming from a certain source whether it's a clinician or hospital that could or may be different from messages that would be delivered to the general public. Vice President Communications, Hospital F, Ontario*

*That is always kind of always in my mind as I'm crafting messages, right, in terms of how do we show what this means to people; individual people on a human level and how do we say that without compromising our reputation and if it is a situation where I'm going to have to suck it up and take a hit then to me it's factual. Director of Public Relations, Health Authority B, British Columbia*

*You have to look who is the audience that you're touching with these messages. Sometimes there are different messages for different audiences. Like, for instance, there might be more detailed messaging, a lot more information for, for instance, the patients that were affected and again with staff than there would be to the general public. Vice President Public Affairs and Communications, Hospital C, Ontario*

In conversations with the interviewees about messaging, the concept of issuing an apology was raised. Apologizing was mentioned earlier (in Table 16 above from the Director of the Health-based Charity) but there are more specific comments on the subject provided in Table 17 below. The people quoted below all work in healthcare and the second quote in particular is quite similar to the process Liebman and Hyman (2004) described as 'disclosure conversations' (Chapter II, p. 37). The healthcare researchers wrote that disclosures should follow a process that is responsive to the needs of the patient to have accurate and timely information, include an apology, provide assurances that steps have been taken to prevent others from being similarly harmed, and offer fair compensation where appropriate (Liebman & Hyman, 2004, p. 22). With the exception of compensation, which is not often discussed in the Canadian system, the parallel between a clinician to patient disclosure and a health authority to public disclosure is fairly close.

Consistent with the healthcare approach described above, in the crisis communications literature Coombs and Holladay (2002) proposed that organizations should match their response with the level



of responsibility attributable to the company for the event. In situations where the company is at fault, they recommended the organization make an apology for the incident and provide reassurances that it will not happen again (Coombs & Holladay, 2002 p. 167). In the first quote, from the Chief at Hospital A. the participant talked about having to deal with lawyers who may not want to accept liability immediately but as she mentioned, if the mistake is made, the organization issues an apology regardless of the legal advice. In a disclosure situation, the team may want to talk about the culpability of the organization in the situation and decide to apologize if it is warranted.

**TABLE 18: Apology**

*And we would apologize. We definitely apologize. I know sometimes in hospital land, the legal folks are all over you, not wanting you to actually accept liability. But the bottom line is when you disclose to the patients, we very clearly apologize for having made the error.* Chief of Communications, Hospital A, Ontario

*This is a particular situation but when people are in a bad situation I think what the public wants to know is: 'A' transparency about there's been a mistake; and 'B' that you're very sorry and you realized it's had an impact on people; and 'C' that you're doing something to you know limit it happening again.* Vice President Public Relations, Health Authority A, British Columbia

*Oh my God, mea culpa, let us you know share the pain and you know the wounds that we have.* Vice President Communications and Marketing, Hospital D, Ontario

In Table 19 below, responses are provided that stem from the question communicators were asked about how they developed messaging and achieved consensus for the language the organization would use to talk about the disclosure. One of the themes that occurred in the data was the importance of practitioners working with others as opposed to developing messaging in isolation. Conducting some level of internal consultation on messaging with the organization's leaders may ensure they understand the approach the organization is taking with the issue and can be conversant with the position. The Chief Communications Officer at the University in British Columbia implied in her quote that there is quite a consultative process that takes place where everyone 'feels as though their particular position has been taken into consideration.' The fourth quote from the University Vice President in Ontario, is consistent with this approach. She said that she would work with her crisis committee to develop consensus on messaging. In the first quote, from the Hospital Vice President, it appears that her department would take the lead on crafting the messages and then have discussions with others depending on the sensitivity of the situation. She would consult with content experts for accuracy ('the clinical people') or the CEO if the messaging had political consequences. The relevance for the model in this section may be to ensure communicators who

are considering a disclosure strategy, consult with others who are internal and possibly external to the organization to validate their messaging and ensure it reflects the situation accurately and resonates with the intended audiences.

**TABLE 19: Consensus Building**

*Communications would generate the messaging. If we didn't...in this instance I feel like we would have sufficient information to actually generate most of it. In another situation, you'd obviously go to the primary clinical people, if you need additional information to create the messaging. If something was very sensitive politically, we'd have discussions with the CEO or other senior administrative people around the messaging. But essentially, generally we develop the messaging and then send it for review to sort of the primary, key internal folks.* Vice President Public Affairs and Communications, Hospital C, Ontario

*Everybody feels as though their particular position has been taken into consideration. They have to be enunciated and then we say well we as an organization this is what we're going to do in response to this you know so it may not allay all the fears but it will quiet down some.* Chief Communications Officer, University, British Columbia

*We would develop all of that messaging, sort of concurrently with probably the risk management people putting together the actual disclosure... and they would be running that through legal and that sort of thing. I think because of the timing, what I would want to do is make sure that we're able to basically have that issue note obviously ready, before we disclose to the patients.* Vice President, Public Relations, Health Authority A, British Columbia

*Our process right now is that this crisis response team gets together and together comes up with the message and it identifies the spokesperson to deliver it. Depending on the situation we want to make sure that that person is well versed on specific technicalities of it so it may be our Dean of Health Sciences, for example, if it were a health related issue. It may be me with the Dean of Health Sciences but we want to make sure that people who can actually answer questions as opposed to just doing the veneer response.* Vice President Public Affairs, University C, Ontario

### 3.4 Strategy Roll-Out

In this category there are three concepts that emerged in the data that are related to the implementation of the disclosure communication strategy: timing, tactics determined by the ability to reach audiences, and finally there are data provided on who from the organization should deliver the disclosure messages to the audiences.

Similar to some of the feedback regarding the segmentation of audiences, the data on the concept of 'timing' addressed the sequencing of when audiences would be informed with the disclosure information. In the first quote from the Hospital Vice President, he was conscious of the need to inform audiences depending on how the issue affected them. He mentioned the 'ethical and right choice' would be to connect with people who are in the affected group on an individual basis if possible prior to the story appearing in the newspaper. In the second quote, the Hospital Chief suggested the internal leadership team and board are informed of the issue and then there is an effort made to communicate with the affected people 'right away'. The third and fourth quotes are

interesting in that they both come from practitioners in universities and they pointed out similar challenges in timing. The third mentions that due to her small community ‘an internal message is an external message’ so she would communicate to all audiences simultaneously if possible. The fourth quote also uses the word ‘simultaneously’ and he recognizes that there may be little time between internal notification and external interest from the media in this case.

**TABLE 20: Timing**

*It may be that you're selective about a certain set of messages given the timeline of how each audience is being connected with. If, in this case, the ethical and right choice is to try and connect directly with each patient on an individual basis we may or may not want them finding themselves reading about it on the cover of the morning paper so, again, that's how I think messages are thought through in a sequential way as well as in a customized way relative to the stakeholder.* Vice President Communications, Hospital F, Ontario

*Well I always think that your senior leadership needs to know right away. I don't know how it works at Sunnybrook, if the board is very much involved, but we always make sure our board hears about these things and I hand the VP team and then I think you need to get to the people who are affected like right away.* Chief of Communications, Hospital A, Ontario

*I mean internal communications is, therefore, very important and because of the incestuous nature of the valley that we live in, the fact that everyone's connected with everyone else, an internal message is an external message and vice versa. So for me that means making sure that we're doing it all thoroughly, simultaneously if we can.* Chief Communications Officer, University, British Columbia

*I think you would have to almost simultaneously be alerting the media because you can imagine it would be a matter of moments before it was out that way so this would all have to be planned and happen in fairly rapid fashion. And you may know you may also want to make sure that internal publications like the bulletin and our website, if people aren't necessarily able to get the e-mail, are participating in that as well so whatever mass communications means you have available at the university would be employed for communicating with the student body.* Director Public Affairs, University B, Ontario

The implications of timing on a disclosure model may be for the practitioner to be aware that even though the audiences are segmented and they may be receiving varying levels of detail about the situation, there may not be a great amount of time from internal to external communication. The communicator may want to set this expectation with her management team to ensure that when a disclosure strategy is implemented, the demands on the time of spokespeople may be such that informing audiences in a scheduled fashion may not happen. The organization should be prepared to communicate with multiple publics in fairly rapid order.

Once the organization is certain of the timing it is going to use to communicate with audiences the decision will have to be made about the proper tactics to use to reach the audiences. In the data provided in Table 21 below, a number of communication vehicles are used to reach audiences such as email, intranet, issue notes, face-to-face meetings and conference calls. In the first quote, from the Retail Chain Director, the deciding factor for reaching those who are affected may be geography

and the inability to pull people together in one place. This is the same point made in the fifth quote from the Director at the Pharmaceutical Company who suggested telephone conference call is the best method to reach her mobile sales force.

What seems to be consistent among all of the quotes in the table below is the variety of tactics that are used to communicate a disclosure situation. There may not be a single tactic that works best for all situations and the common element among the responses below is that the communicator should have a grasp of which techniques are the most effective given the circumstances. The Hospital Chief of Public Affairs in the last quote suggested that there is a need to customize the tactical roll-out depending on what works best for each audience. Timing, the size of the audience, the geographic location, and how people access information from the organization may dictate the method used in a disclosure but the important point to remember may be that the tactics chosen should be selected in the interests of the stakeholders who are receiving the information. A step in the disclosure model may be to pose the question of which tactics are best based to reach the audiences based on their ability to access the information.

**TABLE 21: Tactics Determined by the Ability to Reach Audiences**

*So whatever you know effective means of communication is and I think at that point you know it's kind of hard to assemble all 300 people in one room. It's not like you know the principal calls an assembly. It's people are scattered all over the place so whatever method is in place probably e-mail. Director Communications and Marketing, Corporate Retail Chain Ontario*

*So I feel, face to face with affected employees. I would say phone calls to the affected customers because we're only talking 100 here. And then follow up with registered letters. And then, all company bulletins with the progress as to the situation, so this would be, sorry, internal to employees...the situation and updates as we're going along. Chief of Communications, Lottery, British Columbia*

*We would create an issue note, which is how we then make sure that key stakeholders are aware of the situation. We use issue notes to communicate then with the Ministry of Health, Public Affairs Bureau, as well as our own Board, to just make sure that everybody's on the same page and the issues notes would have fact bound discussion and then advice and recommended response, which is our key messaging around it. Vice President Public Relations, Health Authority A, British Columbia*

*Recognizing that and trying to design an approach that's most customized for those patients you know you would make a very clear and concerted effort to put an expert clinician typically in touch with that particular concern so that they can have good answers to the questions that they may have. Vice President Communications, Hospital F, Ontario*

*Our employees...typically we would use our intranet, and we have a way there...kind of like current news, that we'd actually tell them about the issue, once we figured out what we were going to tell them. Our sales force is probably...they would be the first people to hear this, and they may get it by an email. But more typically, that would be a sort of a series of phone in conference calls. Because they're on the road, so what we more typically do there is, there would a voice mail left for them saying at 1:00 p.m. this afternoon, or 8:00 a.m. tomorrow morning, whatever, at a certain time, call in to this number because your Regional Business Unit Manager will brief you on an upcoming situation, or something like that. So we more often do it on the phone, because they're the ones that usually have more questions, because they're going to get the questions from the physicians. Director of Communications, Pharmaceutical Company A, Ontario*

*For on campus audiences we have a number of channels that we use. We do full on e-mail to all faculty, staff and students. We can do that. We have a student portal that we would post to, our website is very important so we'd post to the main page of the website. We have pop-up capability in our computer labs. So we'd do that. If this affected the residence we would have the residence floor advisors do a walkabout probably. If it were an immediate and drastic situation we would do physical sweeps through the buildings. Vice President Communications, University Alberta*

*It all starts with a detailed look at each stakeholder and the process of communication and making choices about vehicles that you know respects that need to be customized. Sometimes it's one tactic fits all but many other times it's what's the best application for each audience namely, if you're talking with a patient, it may be face-to-face, it may be registered letter, it may be a telephone call by a certain individual or it may be an invitation to a group discussion of some kind or you know it could be let's get the front cover of the paper to tell the story. Chief of Public Affairs, Hospital B, Ontario*

Making every effort to both reach audiences with their preferred method of communication and enabling them to reply to the message will be of use when recommending tactical roll-out in a model but who should deliver the information on behalf of the organization? In Table 22 below, there are a number of thoughts shared including the role of the President and CEO, other leaders throughout the organization, those closest to the most affected groups, and the use of experts to lend further credibility to the messages.

**TABLE 22: Delivering the Message**

**Messaging from the Top**

*I think that when it's an issue that is affecting people and affecting the way that they feel about a company and the integrity of a company I always believe that it should be someone fairly senior and if possible the CEO to come clean on these things. I think that the age of the ivory tower CEO is sort of slowly dwindling and you're seeing a lot of CEOs being very humble about things and being honest and open and in some cases it's working and in some cases it's ringing false. Vice President Corporate Affairs, Insurance Company, Ontario*

*Well, we always talk about our processes, and actually we very rarely use me as the spokesperson right. I'm a huge believer in you use the person who's ultimately responsible for either the area or the whole place. So it's very kind of corporate messaging, but when it comes from the CEO, it's very different than when it comes from, quite frankly, the VP of Public Affairs. I truly believe that our role is in the background. I think fortunately or unfortunately, we're seen as spin people, and I don't think that's going to change. I don't think we behave that way, but I think that's the public's perception. Vice President Public Affairs and Communications, Hospital C, Ontario*

*If it was just, say, an overdosing of a small group of patients, my gut feel in this instance would be to use clinicians, the clinical leaders, the CEO, to be able to talk to that small group of patients individually, rather than going and broadcasting it broadly, only because I don't see that that's particularly necessary. You know, this is not a problem, as you've outlined it here it's not a problem that affects a whole community, or a group of people, or whatever. It only affects a small group of patients within the hospital and so I would seek to communicate in a personal way with that small group. Chief Communications, Hospital E, Ontario*

**Closest Relationship to the Audience**

*So I would say that whoever has the best relationship, or the closest relationship to the patients, and whoever they trust the most, may be a personal...well, it's hard to do this I know, but the ideal would be actual personal conversation with their physician, if not their nurse, which is probably more realistic, the person closest to their care. Chief of Communications, Hospital A, Ontario*

*We always recommend that it's the immediate clinician that they've got the relationship with that has the conversation of disclosure. To me, one of the hard parts is we will talk to those clinicians and sort of coach them, and all that sort of stuff. But where things can go real sideways is in that actual conversation, which you can't control. Vice President Communications, Hospital F, Ontario*

**Use of Experts**

*I would imagine that you'd have to get in a health official of some kind, somebody who really knows about that kind of thing to come onto the campus and it so happens that one of our deans is a medical doctor. Vice President Public Affairs, University C, Ontario*

*We definitely need to have someone come onto the campus to speak, a doctor of worth you know. Somebody really, really important to come and speak about it to get people the information before it became a huge deal on the campus. Once again, because I know that SARS is not too far in the minds of, the minds of people. Director of Communications, University A, Ontario*

Starting at the top of the organization with the President and CEO, the interviewees quoted above mentioned it was important for the chief executive to be visible and communicating on behalf of the organization especially if the integrity of the company was in question. In the first quote from the Insurance Company VP, the communicator mentioned that the CEO no longer has the luxury of living in an ivory tower and has to be accountable to the public for the actions of the organization. The second quote from the Hospital VP mentions the difference between the CEO speaking about an issue publicly and the VP of Public Affairs playing the same role. She suggested that there is more credibility with the CEO providing a public comment than the PR person, which she attributed to communicators being perceived by reporters and perhaps others in the public as 'spin people'.

In addition to having the CEO speak on behalf of the organization, it was mentioned that the leader or person who has the closest relationship to the most affected audience provide the disclosure. The Liebman and Hyman (2004) paper on disclosure conversations in a healthcare setting is consistent with this and suggested that the person with a relationship with the patient should disclose the adverse event. This allows the patient to speak openly and ask questions and hear directly what happened and what is being done to prevent a recurrence (Liebman & Hyman, 2004, p. 22). The two quotes about this in the table above are from healthcare communicators and the concept of having someone who has an existing relationship with the audience be the person to provide the disclosure information could be unique to healthcare given the relationship between patient and clinician. Use of the word 'trust' in the fourth quote from the Chief of Hospital A, may be insightful for other settings. This would require further research to determine its validity but the organization may want to consider appointing someone who has an existing relationship with the most affected group to have the initial disclosure dialogue, if it is possible to arrange.

An organization may find itself in a situation where there may not be a personal relationship with the audiences. Even though there is no formal relationship between the CEO and the consumer, unlike what Liebman and Hyman (2004, p. 22) described in portraying the patient and physician exchange, there may be a public expectation that someone responsible for the company's actions will respond to the situation. Trust in this case may be related to Ulmer's (2001) notion of organizations having established strong relationships with publics prior to crisis or disclosure situations. If companies have healthy relationships with stakeholders in advance of an incident, they may have the ability to withstand public criticism or withstand an adverse event based on their history and stakeholder perception of good business practice.

Separate from using the CEO and someone who has a relationship with the audiences to deliver the messages, a theme that the two university communicators mentioned above was the use of an expert as a spokesperson with publics. This person could be found within the organization or brought in from outside to offer an objective opinion about the situation. Ideally, this person would be seen as

an impartial party to the audiences and not viewed as delivering the corporate-line on messaging. As mentioned earlier in this chapter (p. 116) Hofstede (1980) suggested that the use of experts, who may be in-house specialists or outside consultants is an 'uncertainty avoidance ritual' that organizations may use to reduce the ambiguity of a situation (p. 118). Using an impartial expert in a disclosure to help explain the situation may provide some comfort to the affected audiences.

Now that the development of strategy has been discussed and the implementation of tactics has been reviewed, the participants discussed some of the challenges and barriers to implementation that they have encountered when confronted with disclosure situations. These will be discussed in the next section.

### **3.5 Lawyers, Legalities and other Constraints**

One of the issues that surfaced in the data was the internal and external constraints practitioners encounter when trying to develop and execute a strategy. Lawyers, legislation and in some cases political influences are described in the tables below as hurdles the communicators quoted had to manage when working through their strategies.

In the first quote below, from the Vice President of a Health Authority in British Columbia, she mentioned that the process of working with lawyers is a 'negotiation' where each side will push for what it wants and eventually some resolution is reached on the strategy. In the third quote from the Vice President at an Ontario University, she said that her experience has involved lawyers 'sanitizing' public statements to the point where the communication is out of step with what the organization would normally provide. She said that while it kept the institution out of trouble it may have harmed their reputation as an organization. This is an interesting comment and speaks to the idea of communicators playing the role of an advocate for the organization and publics in situations where the messaging that the organization is going to release is inconsistent with its previous communications. The fourth quote included reference to finding a balance between what the consumers may want and what the lawyers are demanding. Like the person in the first quote, she



said she pushes the envelope a little bit knowing that the legal team will push back until eventually a 'happy medium' is reached. However, not all relationships with lawyers are adversarial. In the sixth quote below, from the Hospital Vice President, the legal role does not try to be overbearing or dominate the discussion of strategy or messaging. This person seems to be a good personality fit with the organization fortunately for the communicator involved.

**TABLE 23: Finding Common Ground**

*Frankly where I find you have the most conflict is between the legal advice on the risk management side, and communications. And we will push, and they will push. It's a negotiation. I don't think we've ever not done something, or done something I didn't think we should do, because risk or legal was drawing a line in the sand. I think again, it's probably because it's cultural that we're usually able to negotiate the middle ground on what can we do. What can we say, that will meet the bulk of the information and communication requirements without getting us in trouble legally, or with other legislative restraints. Vice President Public Relations, Health Authority A, British Columbia*

*I think...it's interesting because I've been at the table where automatically they go to how do we protect the organization from a lawsuit or something. Director Communications and Marketing, Corporate Retail Chain, Ontario*

*Obviously, the legal stuff is really important. But I don't think that we should be working for lawyers. I have been involved in cases where the media releases and the statements that were sent out that had been sanitized by lawyers. And they ended up being, really out of sync with how the senior levels of the organization really wanted to be perceived as dealing with the situation and probably, sure legally it kept the institution or the organization out of trouble but I think that reputationally it went too far, to probably undermine what are really good intentions. Vice President Public Affairs, University C, Ontario*

*As a consumer, what would I want to hear, what do I need to hear and then you have to, of course, balance that with, again, the legal aspect it...of how much can you reveal without exposing yourself to legal risk? So I tend to push the envelope a little bit knowing full well the lawyers are going to say you know we've got to back off on that a little bit and so you sort of come to a happy medium. Director of Communications, Non-Governmental Organization, Ontario*

*There's the level of practicality which is what is our, what's the legal responsibility behind you know behind these sorts of breaches so what are we obligated to do as an organization to you know disclose so there's varying levels of obligation and disclosure required when it when it comes to that but you sort of have to...and I think that you always sort of have to start there so that you know you're covering your bases and not getting yourself in trouble to begin with. Vice President Corporate Affairs, Insurance Company, Ontario*

*Yeah. And I think that's probably reflective of the fact that, of course, XXXX would be there, our in-house counsel. I work with her really closely. She's done this for I think over ten years now. She's been here...she is the most sane and sensible person when it comes to, "Here's the legal advice. Here's what feels like the right thing to do. I'm not going to tell you what to do. I can do the technical things that need to be done." So she would phone the CMPA and she would do all that kind of stuff. And she can give us advice. But I think it really...it goes...she doesn't believe she's in control of these things either. She just gives us the legal advice, but she's very wise. And so, I don't see her as adversarial at all. Vice President Public Affairs and Communications, Hospital C, Ontario*

*When we were really bound by something because we were an international company, there was a significant fear of litigation internationally. And if one thing comes out in one market, that impacts all the other markets, because it's a global media, and you don't want it to impact the share price, and it was very frustrating at that time for sales staff. Because sales reps were seeing physicians every day, in their offices, getting asked questions, and they felt that were not armed with enough information to answer those questions from the physicians. Director of Communications, Pharmaceutical Company A, Ontario*

Litigation and legal advice can be more complicated when a company operates in a global market where a disclosure in one country can affect the international value of the organization as demonstrated in last quote above. In this quote, the effect of stymieing a disclosure strategy is explained quite well at the front-lines where the sales staff members in this case were prevented from talking to their customers intelligently about the issue, which likely caused more harm than good

for the relationships between the organization and its publics locally in this country. Discipline in messaging in a global context may remedy the immediate pressure in the country of origin but the ramifications in other jurisdictions may be palpable and could merit further academic investigation.

Beyond arguments with lawyers, the other constraints a couple of the interviewees mentioned were legislative and political. In the first quote in Table 24 below, the VP for Hospital C expressed her frustration with Canadian privacy law which prevents organizations from disclosing any personal information about clients or patients. Organizations are handcuffed in their ability to respond to whatever accusations a person may be making publicly. To respond to any allegation, the organization would need consent from the individual to allow the corporation to divulge any personal information which could correct or provide context to the issue.

**TABLE 24: Exterior Constraints**

*So it is a balancing act, and I guess, how we try to balance that is, first of all are there basic regulatory limitations...risk management limitations. If we all had a dime for every time we wanted to say what was really going on with the patient going wacko with the media, we'd all be quite rich, but we can't. So, we have to operate within the regulatory and legislative constraints. If there's an error...of course, one of the other things that I didn't mention, but one of the other things that we always do is advise the Privacy Information Commissioner's Office right off the bat, too, because they like to know about these things and sometimes they will advise on whether or not they think an aspect of disclosure is either required or not required. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*At the end of the day, we face this on a regular basis with the Ministry of Health folks out here. Where there's a difference of opinion and at the end of the day, they ultimately write the big cheque to the health authority to run the system, so they get to make the call. Even it's the wrong call, or I think it's the wrong call, they get to make that call. So I'll give as much advice as they're willing to hear, and then at some point, you have to accept that they're going to make the decision and you have to stop raging against the machine, or else you'll drive yourself crazy. Director Public Relation, Health Authority B, British Columbia.*

In the final quote above, the influence of politicians and their staff members was mentioned. A power relationship between an organization and government was apparent in this quote above and in these cases, where an organization is dependent on another for its funding, the communicator may want to be aware of how this could influence the development and execution of disclosure strategies.

### **3.6 How much information is the right amount of information?**

One of the questions asked in the interviews was, 'can an organization communicate too much information?' There were a number of responses to this (tabulated below) and finding a balance between what the organization wants to communicate and what the audiences may need is not defined easily. The first response below, from the Director of Communications with the

pharmaceutical company, is an excellent example of trying to understand what audiences need to know about the situation to make an informed decision. As mentioned previously (Table 17, p. 144), it may involve consulting with the stakeholders to understand what they need to know but the idea is to determine what information is relevant as best as possible and ensure there is a match with what the organization provides. In the Literature Review, (Chapter II, p. 21) Coombs and Holladay defined the concept of transparency and suggested that *'true transparency is reflected in the ability of constituents to identify relevant content areas, search for information about those content areas, evaluate if it is sufficient to meet their informational needs, request additional information when it fails to meet their needs, and assess the overall responsiveness of the organization. True transparency must include responsiveness by the organization to meet constituent needs'* (Coombs & Holladay 2009, p. 8).

In the Table 25 below, the participants commented that 'over communicating' may be providing too much detail on the situation when it is not required for an audience to understand the situation. In the second quote, from the Health-Based Charity Director, the interviewee mentioned that the communicator may be too close to the situation to be objective about the content and seeking input from an outside source may provide some perspective of what information is actually needed. In the third quote, the Chief of Public Affairs agreed that we can over-communicate when you get into details about how decisions may have been made when it may not be necessary to only know the outcome. In the fourth and fifth quotes, the hospital communicators would agree with the previous and they said that the word disclosure does not necessarily mean 'full-disclosure' and that even though there is a bias to disclosure, it is not necessary to 'hang all your dirty linen in public.' The final quote from the University Chief is an interesting generational comment about expectations for information. In her experience working with students, she mentioned that they have a 'sense of entitlement' to have instant information about the situation when this may not be available. The communicator may reach a point where the information is simply not available or the organization is unwilling to provide further details. In the former scenario, this may be easy to manage by communicating whenever the information eventually becomes available, in the latter situation, where

the organization becomes reluctant, the practitioner may have to play an advocate role to encourage the release of the information. The notion of communicators as advocates is discussed in Section 5.0 of this chapter (p. 180).

**TABLE 25: Searching for the Happy Medium**

*I don't think it's about communicating too much information. But I think it's understanding the audiences and what they need to know. Because sometimes...like if you're a sales rep, you really just need to have...like one of the top three things this physician's going to ask me, and how am I'm going to answer these things, and do I believe in the answers. Director Communications, Pharmaceutical Company A, Ontario*

*I think we're so close to it sometimes that we want to be like here's everything right, whereas the average person's like: "I don't need to know that level of..." you know and even the donors, I was surprised, right? You know they're like: "I just need to know what happened, how did it happen and that you're taking steps to prevent it." Director of Communications, Health-based Charity, Nova Scotia*

*Can we over-communicate? Yes, I think that in certain instances we can. Particularly when it comes to, not corporate information which people are entitled to and should have, but perhaps in terms of the way decisions are made internally, and the internal credibility and integrity of executives within the corporation or the hospital. You know, sometimes I think we tell way too much in terms of those kinds of personal issues, and we bring personal issues into the foray which opens individuals up for singling out or personal attack, which very often I don't think is required nor necessary. Chief of Public Affairs, Hospital B, Ontario*

*The one thing that I've reminded folks about around here, for sure, and maybe it's even related to frontline staff, is that the word disclosure does not necessarily equate to full public disclosure. Vice President Communications, Hospital F, Ontario*

*We have a bias towards disclosure and openness, but I also believe that doesn't mean you just automatically hang all your dirty linen in public and the key requirement is the balance of the benefit, public and the patients in terms of the disclosure. Vice President, Communications and Marketing, Hospital D, Ontario.*

*As far as students are concerned it's a little bit trickier because youth in general these days have this huge sense of entitlement for information and you know there's this immediate gratification. I want it all, I want it now. That's a bit trickier and I think it that instance it's as much factual information as we're able to provide as quickly as we're able to provide it and they can't really expect any more than that. Chief Communications Officer, University, British Columbia*

There was another concept that emerged in later interviews which dealt with the frequency of communication in a disclosure situation. Two of the participants (quoted in Table 26 below) offered their thoughts on this subject. The first, who is the Vice President Communications in a University in Alberta, mentioned that the decision is made on a 'case-by-case' basis. The advice from this communicator is to provide information essentially as it becomes available. In the second quote, the Chief of Communications for a Lottery shared an example of when his organization disclosed a list of store owners who had won jackpots. His organization made a decision to put a time limit on the availability of the information and after two days, the list was removed from the website. In this example, the organization was responding to public pressure and it capitulated somewhat reluctantly. This may not have been an example of 'proactive' disclosure but it demonstrated that an organization may want to be cognizant of public demands for information and perhaps make a decision to provide information prior to feeling compelled to disclose by another body.

**TABLE 26: Frequency of Providing Information**

*Yeah. It really...that's a case by case thing. I don't think that I could give a flat answer of it's always, you know, after the seventeenth message, that's too much. Or after...you know. And it...I would probably tend more towards after the third message, it's too much. If we can really, really narrow down what are we trying to say. This university cares about those students. We are doing everything we can to take care of them, and to take care of everybody else on this campus, and we will keep you posted on everything. We'll stay in contact with you to let you know what's going on as our three key messages. And after that, sort of as updates happen, let them know. Vice President Communications University, Alberta*

*This was public interest information so we felt a duty to respond to the media, the very very widespread media interest in this information." But having served that public interest we were quite prepared, after 48 hours, to take that list off our website and no longer provide that information. Now it was already...the Vancouver Sun had already run the list in the paper but we felt that seemed to be a good way to you know respond to the concerns raised by the privacy commissioner while at the same time dealing with the public interest piece. Chief of Communications, Lottery, British Columbia*

### **3.7 Summary**

In this section a significant amount of data has been covered under the core category 'Generating the Organizational Response' to the disclosure situation. There was evidenced provided for research question one (*what types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?*) and research question four (*when involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of publics?*). Related to the second part of research question one, advice from the participants was provided about conducting an environmental scan to determine what is known or happening externally about the issue to determine how to respond and be 'proactive' with the information. Interviewees offered their thoughts on how to segment audiences which also related to research question one in terms of how to communicate disclosure to specific audiences. They suggested that the disclosure should begin with those who are most accountable and work its way outwards to those who are most affected by the situation. Themes about how much information should be provided were shared in the data and the advice here was to offer as much as the audiences need to know to make a decision about the issue but avoid airing the organization's 'dirty linen in public'. Thoughts on the need to be proactive in disclosure communication were offered to 'get ahead of the story' and the importance of honesty in messaging was mentioned.

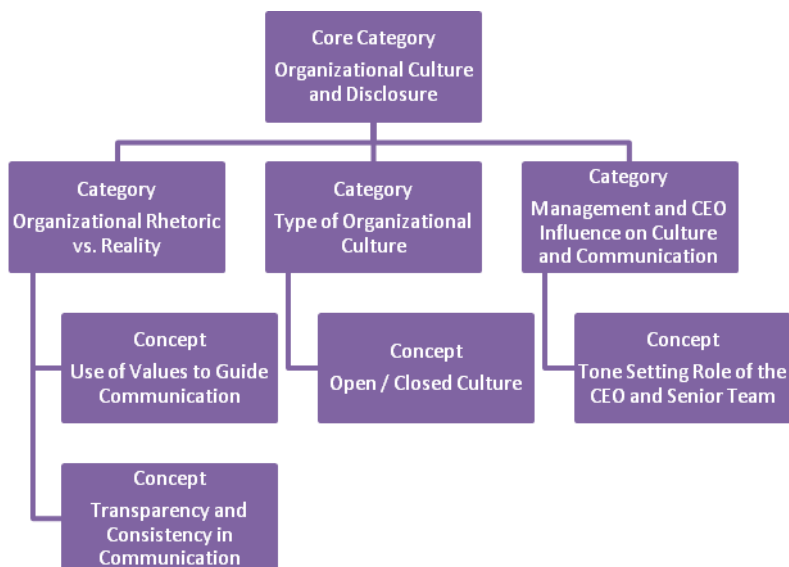
With respect to research question two, some of the interviewees talked about managing ‘tension’ between the organization and its publics and one respondent mentioned that it may never go away. Finding a balance between the organization’s objectives in a disclosure situation and those of its audiences may not be possible but elements of the ‘mixed-motive’ model that Murphy (1991) mentioned may be useful for the disclosure model. In this approach, it is recognized that the two organizations retain their self-interests but are willing to work together to achieve a limited objective which, in the case of disclosure, might include understanding the situation to make an informed decision about what to do next.

#### 4.0 ORGANIZATIONAL CULTURE AND DISCLOSURE

Data are presented in this section that relates mostly to research question number two: *how does the organization’s culture affect both its willingness to communicate and use of specific methods or strategies to disclose information publicly?* There were three main categories that emerged under the core category ‘organizational culture and disclosure’ (shown in the diagram below):

- 1) Organizational Rhetoric vs. Reality
- 2) Type of Organizational Culture
- 3) Management and CEO Influence on Culture and Communication

#### Schematic of Core Category Three: Organizational Culture and Disclosure



#### **4.1 Organizational Rhetoric versus Reality**

Three of the participants (quoted in Table 27 below) mentioned values when they were asked about how the culture of their organizations may influence disclosure decisions. In the first quote, the Director for a Retail Chain commented that his organization had a 'communications charter' which was specific to how the organization would respond to situations such as disclosures. His comments about values being 'pretty vague' suggested that for him, having values expressed in a written charter provided some concrete direction about what to do in his role as the lead communicator. In the second quote from the Chief Communicator in a Hospital, the sentiment is somewhat similar to the above notion of having values or 'principles' in this case, are 'guiding' which would help provide some direction in a situation where an ethical decision is required.

A 'communications charter' or guiding principles may be similar to what was described in the Literature Review (Chapter II, Section 6.1, p. 63) as part of a code of ethics. Schwartz defined a code of ethics as: *'a written, distinct, formal document which consists of moral and ethical standards which help guide employee or corporate behaviour. Codes of ethics, by their very definition, imply that they contain normative guidelines for behaviour'* (Schwartz, 2002, p. 28). If a communicator and the management team have a written understanding about how to respond to certain situations, it may make decision-making easier when events actually happen. A communications charter, guiding principles or a code of ethics may help clarify any ambiguity that might exist in a disclosure situation if for example the company has a stated commitment to be open and honest with its public.

**TABLE 27: Use of Values to Guide Communication**

*I think that there are, again this is a...this is a values question. I know that personally there at XXXX and also in past you know lives we've had a sort of a communications charter that is subbed to our system of values so values can be pretty vague sometimes. So there's not very many values that sort of state if we you know screw up we'll come clean.* Director, Communications and Marketing, Corporate Retail Chain, Ontario

*I would hope that the values of the organization and I'm assuming the vision and the principles are guiding...and operating principles, would be solid enough that they would come into this conversation.* Chief of Public Affairs, Hospital B, Ontario

*The values of an organization are really important to me, and the culture and sort of how people operate within that culture, are very important to me and so, I like to think that I'm going to work and I've worked with organizations that my values are in general alignment with theirs. And, so hopefully, there isn't too much conflict. That it doesn't become an issue. But at the end of the day, I like to think of myself as a principled individual, and with an idea of, a sense of what's right and wrong. And I know, as a consumer, how I would expect to be treated and receive information about certain things. And that's how I...I would try to respect that.* Director Public Affairs and Communications, Lobby Association, Ontario.

In the third quote above, the Director of Public Affairs for the lobby association mentioned the importance of having her sense of values aligned to those of the organization. Communicators may want to be aware of any gaps in value congruence between them and the organization in advance of a situation that will require an ethical decision. In the quote above, she mentioned that she considered herself to be a principled individual and in a disclosure situation she would treat people as she would like to be treated. This draws on both virtue theory and the golden rule or deontology, meaning that she would rely on her sense of right and wrong and she would use her perception of how she would like to be treated in a similar situation to guide her decision-making about a disclosure strategy. This use of multiple moral frameworks in decision-making was mentioned earlier in this chapter (p. 130) and may provide some further validity to the concept that more than one is used in disclosure decision-making. The relevance of moral frameworks and values to the disclosure model may be for communicators to be aware of their organization's set of values and how these may be used to guide decision-making in a disclosure situation.

In the Table 28 below, the concepts of 'transparency' and 'consistency' in communication were raised as issues related to culture and communication of disclosure situations. In the first quote below, the Director for the Retail Chain was describing an issue in his organization where there is discrepancy between Canadian and American prices that are posted on the products in his company's stores. When he made this comment, the Canadian dollar was near par with the United States dollar and his company's customers expressed frustration about why they had to pay more



(the Canadian price is about 20% higher). He said that it was important to be 'open and honest' about why they were taking a stance on the issue of not dropping the Canadian price to match the one in U.S. currency. In this case, it was important for him to advise his company to be consistent with its stated values of being 'customer-focused'.

In the second quote, the Director for the Pharmaceutical Company is responding to the fictional vignette where a small number of people were presenting in Emergency Departments with adverse reactions to one of their products. She said there needed to be consistency in 'transparency' and 'responsiveness' in both internal and external dealings. She mentioned that this is actually a management responsibility to instill this culture among the employees. Her comment is interesting in the sense that the company may be open and honest internally from management to staff but it needs to maintain this consistency when it deals with external audiences. Similarly, the third quote from the University Vice President, suggested that the disclosure has to fit with the overall communication strategy of the organization and the organization should communicate the same in a crisis as it does in times of relative normalcy. In the fourth quote, the Chief of Communications said the culture is 'critical' to determining how disclosures take place in an organization. He said the history of how an organization responded to similar issues in the past may guide how they manage them in the future.

**TABLE 28: Transparency and Consistency in Communication**

*You know what? If this is who we want to be as an organization, and we want to be accountable to our customers and we want to be customer focused, and we want to do this, and this, and this, then we've got to be open and honest about the reason why we took a position on a certain issue. Director of Communications and Marketing, Corporate, Retail Chain, Ontario*

*Do we...are we committed as an organization...is part of our culture for transparency, and responsiveness and concern and openness, not only in our internal dealings, but with our external...so I think part of that culture and that philosophy is a management responsibility. I would want to be in a company that took things like this seriously, that demonstrated concern, and is interested in transparency. Director of Communications, Pharmaceutical Company A, Ontario*

*So I think the disclosure that we engage in really has to fit the overall communication strategy of the organization. It has to fit the tone of the strategy as well. If we suddenly have a tone when we're disclosing information, particularly around crisis, that doesn't match fundamentally with how we normally communicate...it can be a real problem. I think that we need to make sure that what we're doing and saying when we're disclosing information is what we know as communicators is the right thing to do. Vice President Public Affairs, University C, Ontario*

*I think it's critical. It's ethically critical because, organizations have cultures that are open and transparent and accountable; or, the opposite end of the spectrum. So, the culture will play a big role in terms of setting precedent. What has the organization done with these kinds of problems in the past, how have they dealt with them, generally what is the modus operandi that they've used, what is a typical default position when they run into crises, who plays the lead role, what sort of position does the CEO take, how are the various stakeholder groups communicated with, what vehicles do they use, how is the PR leader used in that particular instance, so those are all examples of how the culture typically defines the corporate approach to dealing with problems like this. Chief of Communications, Hospital B, Ontario*

*This is a really interesting one for us within our organization. We're going through this right now. We're sort of trying to really adopt this notion of a culture of safety and learning, and openness and transparency. I think that one of the biggest things that we run up against is that we can say the words but I'm not sure necessarily the actions of the organizations always follow along with that. There are some people that have been around the system for 20 years, have their entrenched ways of doing things. And while we might as an organization, talk about we have a culture of openness and transparency, and we're going to do what's right for our patients and been seen doing what's right...we don't always do that. And I think that's a struggle that I wrestle with quite often about. It's one thing to talk about doing the right thing. It's another thing to actually be doing the right thing. And sometimes those two don't always mesh up. And that's...I think that's even more dangerous and challenging for our staff, because now not only are you perhaps not being open, transparent, committed to safety, whatever...you also sort of lied about it. Telling people that you are, but you actually aren't. Director Public Relations, Health Authority B, British Columbia*

In the fifth quote above, the Director for the Health Authority, pointed out that his organization has struggled with the discrepancies in what it says and what it does. He attributed this to people who may be 'entrenched' in their ways of doing things and may be resistant to adopting a culture of openness. Hofstede (1980, p. 39) wrote that older members of a management team may be less sensitive to value shifts in their environment than the younger ones, which may speak to the generational comment the practitioner made above about those who have been 'around the system for 20-years' and are unwilling or unable to change their ways to become consistent with what the organization is describing as its commitment to being open. Schein (2004, p. 230) wrote that something can become part of a culture only if it works in the sense of making the organization successful and reducing the anxiety of its members. For transparency and openness to become part of a culture, the members of an organization may have to understand or be shown that these principles can lead to success. The model developed in this thesis may provide a path to assist

organizations and communicators in making decisions about disclosures that are in the best interests of the organization and its audiences. A logical step in the model may be to ensure that some 'cultural validation' occurs to check the disclosure strategy to ensure it is consistent with the organization's culture, values and practice.

#### **4.2 Organizational Culture Type and its Effect on Disclosure**

Participants (quoted in Table 29 below) commented on 'open' and 'closed' and closed cultures and the impact each may have on disclosure communication. As mentioned in the Literature Review (Chapter II, p. 51), Sriramesh, Grunig, and Dozier (1996) found that it was possible for the two-way symmetrical model of communications, which is characteristic of sharing information and working to reach a compromise with publics, could be practiced in either a culture that was highly open and participative or one that was relatively closed, authoritarian and bureaucratic. In the comments below, the participants offered some insight into how culture influences their roles as communicators in 'open' and 'closed' organizational cultures.

In the first quote in Table 29 below, the Director for the Lobby Association said that the management team may be committed to communicating openly but fears litigation and becomes reluctant to share information as a result. She suggested that the communicator in these situations may have an 'uphill battle' to try to convince a hesitant team to disclose information if they believe there is legal risk.

**TABLE 29: Open / Closed Culture**

*If you don't have a really open culture where the organization wants to communicate very openly with the public, and they may feel that there's a lot of risk there, they might be afraid of litigation. There might be...just a...in the past they weren't very open in their communications, then you really have a much more uphill battle to try and convince them to do that, and to convince them that it's the right thing. Director, Lobby Association, Ontario*

*My feeling...our organization right now is that they are fairly open, but as I say when push comes to shove, people get scared. They start to make the wrong decisions. So I think it has a lot to do with, at the end of the day, how you communicate. Director Public Relations, Health Authority, British Columbia*

*If the organization is a laid back, open door, communicative, kind of a culture, where everybody's collaborative and sharing information, then I would think that would make it easier to do some of these things whereas, if the organization is tending more towards bureaucracy and red tape then that could make it difficult. An open door policy university could make things quite challenging. When you need to manage a high end situation like this, sometimes you need to close some of those doors, and filter out some of the interruptions. Vice President, Communications University, Alberta*

*We are currently quite a large university college on the cusp of becoming a full university and we grew from roots of the college so it was very much a 1970 hippy kind of all in the family, granola type of place and that culture is still there. I mean there are undertones of it and what that means to us is that everybody is very connected on a personal level. There's this whole family feeling. There isn't a big break between staff and faculty, like there's not that sort of academic snobbery that I think you find at a lot of bigger institutions and as a result of that there's huge sense of entitlement in terms of information. Chief Communications Officer, University, British Columbia*

*So we have a culture that supports...we don't have the problem of a culture that is secretive or people arguing against wanting to disclose, and in fact, we have a Board that is also frankly biased in favour of proactive communications. So all of that, frankly, just makes our job easier. The communications strategy we would be recommending would be the same regardless of the culture but because we have a supportive culture around it, it makes it a lot easier for us, and it happens pretty smoothly. Vice President Communications and Marketing, Hospital D, Ontario*

*Well, what I think, and now I can compare the hospital environment to my current environment, where my current environment is so...there's so much structure, which is great. Whereas in hospitals, in my experience, not necessarily so much. I think that, and both of those environments for me are very risk averse and very conservative. What I found in a hospital environment and I don't think this was just specific to the hospital but risk aversion tends to lead people to not want to say anything at all or not talk to anybody. Director of Communications, Pharmaceutical Company A, Ontario*

*I think with XXXX, we are very risk averse, but we've got all these regulations that we have to follow, as well as all these global standards, so we've got an actual process, and communications is very valued. And often communications is making major decisions around this stuff, and so there the culture is different. Where they're risk averse, but they know what they need to communicate, and there's a process for that. So that's good. I just think that when the culture is really risk averse and not so sophisticated around communications, you've got a problem. Director of Communications, Pharmaceutical Company A, Ontario*

Consistent with the first quote, the Director of the Health Authority in the second quote said that his organization is 'fairly open' but when 'push comes to shove, people get scared.' This means that the management team is normally quite open but when an issue arises that requires disclosure, they get concerned about the potential legal and reputational ramifications of a disclosure on the organization. A disclosure model may reduce some of the anxiety people feel around these situations. Hofstede (1980) wrote that an uncertainty avoidance tactic that systems sometimes use is a kind of standard, measurability of accomplishment that includes a possibility to use feedback and that 'pseudo-control' methods such as planning are used to reduce uncertainty (p. 117). The model in this thesis is a type of planning document that can walk people through some of the decision-making that occurs around disclosure situations. The model has feedback and evaluation methods

built into its structure and these may provide some sense of comfort to people who are confronting these issues. It remains to be seen whether or not the model is an effective tool but it might provide a good starting point for discussion about disclosure.

In the next two quotes from communicators who work in universities, there was some similarity in how they felt about cultures being too open. The first communicator initially suggested that an open culture that is 'laid back' and 'communicative' might be easier to facilitate a disclosure with a lack of 'red tape' and 'bureaucracy' but she thought about it more and then ended her quote by saying that you may have to 'close some of those doors and filter out some of the interruptions'. The second communicator drew on the 'hippy kind of all in the family' culture that founded the school and while she mentioned that this was positive in terms of a working environment, she also commented that this can be difficult when people feel they have a sense of entitlement to information. This could be a challenge for her and her senior team when there are too many people adding an opinion into the management of the disclosure. From a practical perspective, it may be difficult to plan for a disclosure if those tasked to do so are interrupted and questioned before they can present a plan.

In the final two quotes from the same participant, she compared her current role in a corporate environment with her former role as a hospital communicator. She seemed to enjoy the structure of the corporate environment for managing disclosure issues as opposed to the hospital where there appeared to be less accountability among the leadership for handling these situations. She described them both as 'risk averse' and 'conservative' but the corporate environment had more of a process in terms of 'regulations' they have to follow for disclosure events. She also commented on the level of 'sophistication' that the organization and its leaders have for communications. In her corporate role she seemed to be more valued than in the hospital ('communications is very valued... and often communications is making major decisions around this stuff...'). What was interesting about these quotes was she described both the organization and hospital cultures as risk averse and conservative but the difference seemed to be the value each placed on communication and the structure and process they had in place for managing these events. The corporate environment

placed a high value on communications whereas the hospital did not seem to be as organized for these situations. The role of communicators in disclosures is discussed in more detail in section 5.0 of this chapter (p. 169) but as it relates to culture, the practitioner may want to understand the value the organization has on communication, whether or not it is an open or closed culture and whether or not management has the courage to implement a disclosure strategy. In the next section data are presented on the influence the CEO and management teams have on the organization's culture.

### **4.3 Management and CEO Influence on Culture and Communication**

Participants who commented on the role the CEO and management teams play in shaping their organizational culture, mentioned that support for disclosure from the executive level is critical to setting a tone throughout the organization. In the first quote in Table 30 below, the Vice President of a Health Authority in British Columbia said that she is able to get a 'quick response' from her CEO whenever there is an issue that she needs to discuss. From this quote, it looks as though she has a good partnership with the CEO. She said that they would phone key stakeholders together to discuss the issue and plan how to deal with it together with the senior team who would be called into the situation as soon as it happened. By bringing everyone on the senior team together early on in the process, she said that 'Everyone knows what the game plan is moving forward.' Achieving consensus among her senior team for the disclosure plan seemed to help her organization execute the strategy.

I thought it was important to include the second quote from the same participant above due to the extraordinary nature of the situation. The example the participant is talking about in her quote was a tragic medical error where a child was injected with the wrong chemotherapy medication and died as a result. This is a powerful example of the CEO of this organization disclosing an incident based on what she thought was the right thing to do. She did not wait for a legal opinion. She apologized and took responsibility for the situation immediately but took some criticism for doing so, as the participant said in her quote. What was also interesting about the participant's mention of this case is that it took place 10-years before the interview for this thesis. The incident clearly had a lasting effect

on her. The Vice President's description of this event may be similar to how Schein (2004) described the influence leaders have on an organization. He wrote that cultures begin with leaders who impose their own values and assumptions on a group (Schein, 2004, p. 2). Schein explained if that group is successful and the assumptions come to be taken for granted, a culture is created that will define for later generations of members what kinds of leadership are acceptable (ibid). This communicator may have been influenced by the actions of her CEO in the management of this situation.

**TABLE 30: Tone Setting Role of CEO and Senior Team**

*I think one of the real benefits of our culture, and again I think this tone is set by this talk at the CEO level, is that we get a really quick operational response. So when something like this happens...and these things happen, I can be within a half hour sitting in the CEO's office and we're phoning the head of, in this scenario, the Cancer Agency, and their senior people and we have a conference call right off the bat, and we just get the game plan. Everybody knows what the game plan is moving forward. So that kind of really quick operational response is very cultural and definitely breaks down the hurdles. Vice President Public Relations, Health Authority A, British Columbia*

*We have this history of disclosure. So, for example, I know our risk people would say way back with that oncology incident that we disclosed too much, because I know the CEO didn't bother asking legal for advice. She did what she thought was the right thing and it was right thing. I know there's (sic) people in risk and legal who have long memories, who...they've been kind of cleaning up from that for a long, long time because it obviously did increase the litigation risk. Vice President Public Relations, Health Authority A, British Columbia*

*When we when we screwed up on releasing that information several years ago the first thing you do is you know you go into the CEO and you say: "We messed up. We sent something out that shouldn't have, here's how we're fixing it." And his response was: "Fine." If he'd heard about it from somebody else that we'd screwed up there would have been hell to pay. So the culture both internally in how you deal with external stakeholders is quite critical. Director of Communications NGO, Ontario*

*I think the intuition is sometimes from senior exec or from the political lands that they don't want to admit any weakness or failure. I think they misjudge the public in thinking that the public will see that as a failure. Director of Communications, Provincial Government, Nova Scotia*

*I've actually been in situations in a culture that has evolved into a better one, and been faced with kind of say nothing, do nothing, whatever. I think it's the culture, and I would also add, it is the CEO who can make that link, but it's also, especially in a situation like this, the CEO has to have confidence in the recommendations of the crisis team, but also, are they able to see through the short-term. It's ugly for awhile, and so are they willing to stay the course and do the right thing. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

In the third quote above from the NGO Director, the communicator mentioned the compassion her CEO demonstrated when the communications department made an error. She commented that if this level of understanding is demonstrated internally when people take accountability for errors, then this approach should guide external interactions with stakeholders. For this organization, the consistency in behavior of the CEO in internal and external dealings with publics seemed to set a tone for how this communicator approached her work. The fourth quote, from the Provincial Government Director, runs somewhat contrary to the compassionate tone of the previous and the practitioner quoted here suggested in her work with senior executives, there is some 'bravado' where they do not want to 'admit any weakness or failure'. She mentioned that there may be more

understanding in the eyes of the public for leaders who are able to admit mistakes. In a disclosure situation for example, this communicator may have to spend considerable time working on the messaging of a disclosure to ensure there is some empathy conveyed, if this is appropriate to the situation. The quote alluded to the role the communicator may have to play in convincing the management team to convey a sense of compassion or understanding for the people affected by a situation which may involve taking accountability for an error, as the CEO from the health authority referred to above was able to do. The role of the communicator is discussed in more detail in the next section of this chapter.

In the final quote, from the Vice President of the Pharmaceutical company, where the organizational culture has evolved from a 'say nothing do nothing' one to a more open environment. She said that it took the CEO to lead this change. She also said that the CEO has to have confidence in the recommendations of a team and stick with a difficult recommendation that might be made to disclose information that could cause reputational damage, especially if it is in the interests of those who are impacted and is the 'right thing' to do. For this participant and the others quoted above, leadership from the CEO is an essential element that can determine the success or failure of a disclosure strategy. The relevance to a model may be for the communicator to ensure whatever the recommended strategy is for the disclosure that it receives the endorsement of the CEO and possibly the senior management team.

#### **4.4 Summary**

To sum up the data presented in this core category, there were three main sub-categories which included a discussion of corporate rhetoric versus reality in messaging, identification of organizational culture types and how they may help or hinder disclosure, and the role the President and CEO and senior leaders can plan in disclosure scenarios. These concepts relate to the second research question for this thesis: *how does the organization's culture affect both its willingness to communicate and use of specific methods or strategies to disclose information publicly?*



In the first part of this section, the potential for disconnect between an organization's stated values and what actually occurs was examined mentioned. The advice shared was to minimize this as much as possible in disclosure situations and during the regular course of business. One of the strategies suggested to do so is to create a charter or contract to articulate in advance of a disclosure scenario how the organization will react and respond. Types of organizational culture were discussed in the second section and how they can influence the disclosure process. The data demonstrated that there are opportunities in most organizational cultures to bring forward disclosure strategies but there are challenges to be aware of in open and closed cultures. The relevance of this section for the model is to be aware of how different culture types may be a predictor of success for executing the disclosure strategy. Senior leaders and the President and CEO can play a critical role in a disclosure strategy. This third section provided commentary on the importance of executive endorsement of the plan to ensure there is support to develop and implement the disclosure strategy. The relevance for the research question may be that the communicator will have to be aware of how not only the culture influences disclosures but also the views of the CEO. In terms of the model, the advice participants provided in this section may provide sections in the diagram to ensure there is consultation and consensus building activities that take place at the senior and other levels of the organization to support the disclosure strategy.

In the next and final section of data in this Chapter, the input received from study participants on the role public relations practitioners should play in disclosure situations is presented.

## **5.0 ROLE OF PUBLIC RELATIONS PRACTITIONERS IN DISCLOSURES**

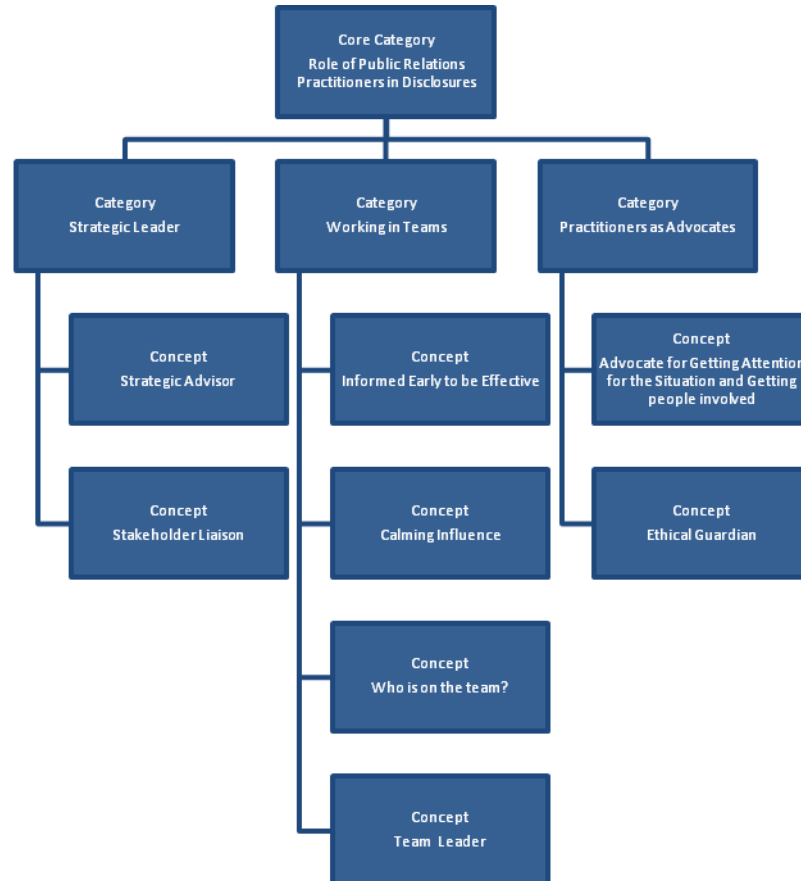
Discussion of this core category relates directly to the third research question: *what is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?* Data presented in the tables in this section provide evidence of three categories:

- 1) Strategic Leader
- 2) Working in Teams

### 3) Practitioners as Advocates

Participants commented on their experience in dealing with disclosure situations and offered insights on their leadership style and the value they brought to the organization in these situations, which was sometimes outside of the normal duties of a public relations advisor such as acting as a 'calming influence' in the organization as it manages its way through the situation.

#### Schematic of Core Category Four: Role of Public Relations Practitioners in Disclosures



#### 5.1 Communicators as Strategic Leaders

In Table 31 below, evidence is provided from four communicators who mentioned that their primary role is to provide advice at some level whether it is on the internal mood in the organization, filtering information to provide strategic advice, and support the team through the situation. The comment from the Chief at Hospital A, mentions a theme that will be picked up later in this chapter about not panicking (p. 176) but the relevant point she made for this section is the idea of looking 'at the big picture and to look outward'. She also advised to look at the behaviour of 'what's going on in the

organization'. In a disclosure situation, the communicator saw herself as someone who could provide the organization with advice about how the situation was perceived with internal and external publics. The University VP, perceived her role to be that of a 'filter' who was responsible for analyzing information and providing her boss with the necessary data to make a decision about the situation. The third quote, from Hospital C VP, includes reference to the communicator providing strategic counsel and advice about the situation not necessarily managing it. She suggested that the role of the healthcare team is to manage the actual resolution to the situation but she can provide advice and counsel on communications. In the last quote, from the Provincial Government Director, the advice is similar to the sentiment in the previous quote where she said her role is to provide advice and not tell people what to do. She talked about the notion of a 'command and control' environment where the expectation might be for people to follow policies and procedures willingly but this may not actually be the case. She believed that the best approach to act as support and help people through the situation by providing advice instead of commands.

**TABLE 31: Strategic Advisor**

*Well, it sounds like a simple thing, but you've got to keep your head about you and not panic, because a lot of people will panic around you. I do find that we're often, sort of like you've got to be the calm in the storm, because you're the...your responsibility is to look at the big picture, and to look outward. I mean everybody's job responsibilities are pretty clear. The physician does this, the nurse does this. Yes, the President is overseeing the strategy and operations of the hospital...I mean your job is really to look at more behaviourally, what's going on in the organization.* Chief of Communications, Hospital A, Ontario

*Yeah, and filtering all the details that come in, and sort of acting as a strategic judgment... really bringing in all the information and analyzing it, and providing her with the best strategic advice that I can. So she doesn't need to know all the little details. I've got to go through things and figure out what's the important stuff. What really needs to be done? And sometimes it's the little details that are important, and some of the big details are unimportant.* Vice President Communications, University, Alberta

*In an organization this size, or the size you're in, you're never going to know all this stuff, right? I mean you're just not going to. So you have to believe that people are going to do the right thing, and that you're there to provide strategic counsel and advice. But you're not there to tell them how to do their jobs. I mean, essentially this kind of thing is really the job of the Healthcare Team.* Vice President, Public Affairs and Communications, Hospital C, Ontario

*I think there are two ways to do what we do. I think there's the sort of command and control and belief that you put enough policies in place, and you police things often and often people will do what they're supposed to do because you know best. I actually don't think that works at all. I think what works is if you're always the same place to have a discussion, and you always give good advice and you essentially say, "Look, I'm here to support you, not to tell you what to do."* Director Communications, Provincial Government, Nova Scotia

In Table 32 below, the three quotes from communicators include reference to bringing people together to resolve or discuss the issue. In this sense, the interviewees below saw themselves as a kind of 'stakeholder liaison' who is responsible for ensuring the organization informs internal audiences such as the Board of Directors and reaches out appropriately to stakeholders to engage

them in a discussion about the situation. In the first quote, the Vice President of the Health Authority saw it as her role to connect with the Ministry of Health to inform them the hospital had an issue. In the second quote from the Vice President of an Ontario University, she said that it was her role to 'get the right people talking to each other to avert that real PR disaster part of it.' She was referring to the importance of communicating directly with stakeholders to create informed publics who may not like or agree with the situation but are at least informed which may reduce the likelihood of what she called, 'inappropriate, misguided comments' that can spread during a disclosure situation if the audiences are not informed properly. In the final quote below, the Pharmaceutical Vice President, commented that her role is to 'facilitate fielding good lines of communication between people' whether it is done publicly or privately.

**TABLE 32: Stakeholder Liaison**

*My role is making sure that some of the key internal and governance stakeholders are getting their needs met because part of my role is making sure that we as an organization are meeting the needs of those key stakeholders. So for me, whatever time it is, I would be in touch with the senior contacts with the Ministry just to make sure that they're aware of what's happened. I would be making sure that we sent our issue note out to the Board before anything became public, so that they've got the awareness of what's going on. So I would be making sure that those key stakeholders needs are being met. Vice President, Health Authority A, British Columbia*

*I can see that communicators can play a really big role to get the right people talking to each other to avert that real PR disaster part of it. This would be one of those situations, where I would see that the role of the communicator can really help to mitigate what could be some real inappropriate misguided comments publicly, or misinformation being spread around, by really linking key people up together. I mean, I think that that's a very tactical, perhaps a very deliberate role, that communicators could be probably playing more in crisis than they actually do. So I think that communicators can really do more of that sort of thing; to link the right people up together. Vice President Public Affairs, University C, Ontario*

*I think the nature of that sort of personal concern, that I think communicators can be much more facilitative of fielding good lines of communication between people, that perhaps are completely outside of the public eye, unless...outside of the formal means that we tend to use as communicators to get messages out. But certainly just as important, if not, in some cases more important. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

These first two concepts: strategic advisor and stakeholder liaison are similar to the notion of a 'boundary spanner' that was mentioned in the Literature Review (p. 85) by Aldrich and Herker who wrote that information from external sources comes into an organization through boundary roles that can link organizational structure to environmental elements by buffering, moderating, or influencing the environment (Aldrich & Herker, 1977, p. 218). Leifer and Delbecq (1978) argued that the importance of boundary spanning is to ensure that information about environmental contingencies needs to reach organizational decision makers to ensure the appropriate decisions relevant to environmental conditions and contingencies may be made (Leifer & Delbecq, 1978, p. 40). Hofstede (1980) wrote that corporations may need a modern equivalent of the 'medieval king's court jester', a

person on the team with direct access to the highest decision makers, whose institutionalized role is to challenge values and be involved in environmental scanning, in meeting people from different walks of life, in moving outside of the closed inner-circle of the corporate decision makers (Hofstede, 1980, p. 39). Heath (2001, p. 46) wrote that by building relationships with audiences, communicators can assist individuals and organizations in making enlightened choices, which can reduce uncertainty among decision-makers by providing them with an understanding of the external environment (Heath, 2001, p. 48). For the purposes of the research question relevant to this section and the disclosure model, one of the roles the communicator may want to play in these situations is an interpretive one to help the organization understand and link with its stakeholders. In the model, it may be helpful to mention working with stakeholders and conducting an environmental scan.

Communicators do not manage disclosures alone and the next section will discuss the specific duties the interviewees play while working in a team environment to resolve these issues.

## **5.2 Working in Teams**

There were a number of concepts that emerged under this category which included i) being informed early to be effective, ii) being a 'calming influence', iii) who is on the team, and iv) team leader.

To be effective in a disclosure situation and be a strategic member of the team charged with managing the situation, a few of the interviewees mentioned the importance of being informed as early as possible to be helpful. In the third quote below, the Director of the Retail Chain said that to be brought into a situation at the '11<sup>th</sup> hour' is too late and the expectation might be to 'fix it' whereas he felt he could be more effective if brought in sooner to provide more input on the strategy discussion.

**TABLE 33: Informed Early to be Effective**

*I think as far as when we should be informed, obviously, right as soon as they know there's an issue. Vice President, Corporate Affairs, Pharmaceutical Company B, Ontario*

*I would prefer to be informed directly at the beginning as soon as it becomes even a kernel of an issue or you know when the first symptom has come up and so we can manage it properly as a potential but not a happening thing. Director of Communications Officer, University A, Ontario*

*Obviously, it's your leadership and of course your communications team which is one of those things when you know there are companies that will bring their communications people into the situation a bit late in the game and... I think we've all, as communicators in our business, we've all gone through the "holy shit" moment where people will bring you in at the 11<sup>th</sup> hour and say: "Okay, fix it," type thing whereas if you had been brought in you know weeks earlier you probably could have had a lot more input and managed the situation better. Director Communications and Marketing Retail Chain, Ontario*

*Well it depends on how open people are and sometimes people feel that knowledge is power and that there's no need to tell anyone about what may be an emerging issue or you know there still may be a notion that communications doesn't have to know because it doesn't concern them, it's not a communications issue in their view. So that has a great deal of impact, I think, in how professionals can do their work. If people understand that communications should be involved at the outset and very early on or if they find that there is a potential problem, that they talk to their communications colleagues, then I think it's a whole lot easier all the way around but certainly it's a whole lot easier for the communicators to do their job. Director of Communications, NGO, Ontario*

When asked why people may be reluctant to involve communicators early in the process, the Director in the last quote above mentioned that people in an organization can use 'knowledge as power' and they hold on to information until it is too late for the practitioner to help manage the situation effectively. Consistent with the other feedback, she said that it is easier for communicators to do their job if they are not brought in at the last minute. Granted, a long lead time on an issue may not always be possible and events will happen that take everyone in the organization by surprise but the communicators above believed that if they were informed at the same time as everyone else, they would have an opportunity to manage the situation better than joining the management of the issue late in the game.

An unexpected role for communicators to play in disclosure situations emerged in the data that may be outside of the normal role of a communicator in an organization. A few of the interviewees, quoted in Table 34 below, talked about the importance of their demeanor in managing the issue and how they feel the need to be perceived as being calm and convey to others involved a sense that everything is going to be 'okay.' As the VP of Hospital F mentioned in Table 34, 'Often people are sort of clinging to the ceiling' and he saw it as his job to 'reassure people' that there is a way to manage the situation. His comments are shared by the VP of Hospital D, who said that she has been most effective when involved in a disclosure situation when she has spent time trying to 'calm people

down.’ She said that it was her job to deal with those who might be panicked about the situation such as the Board Chair. The University Communications Chief in the third quote took it a step further and suggested she offered a ‘voice of sanity’ to the process to managing the situation. She said one of her methods of keeping people on track was to be ‘very clear about the steps we’re following’. Interestingly, a model for disclosure may help people see the steps of the decision-making involved in developing and executing a strategy which may or may not provide them with some comfort.

In the fourth quote, the Director of Communications and Marketing for a Retail Chain in Ontario, shared his thoughts about why he may be the only one on his management team who has a ‘clear picture’ of what really should happen. He said that it is because he works in ‘grey every day’ which means that there is a certain level of ambiguity that exists in these situations that he saw as being akin to everyday decision-making in communications. The University Vice President, in the final quote below, mentioned the importance of the communicator demonstrating confidence in how she manages the situation. She said that people are ‘looking to you for leadership’ in managing the communication surrounding the situation and if you are ‘frantic’ people could lose confidence in your ability to handle the situation.

Maintaining a sense of calm in these situations is not likely unique to the communications function in the organization. Being confident and keeping composed throughout is probably the role of every leader involved in the situation. It may be that there is heightened anxiety around the leadership table about the potential for negative press and reputational damage and the communicator may be able to provide a sense of calm around this and talk people through it but the danger here is the risk of the practitioner setting a false expectation among the management team that the organization can ‘spin’ its way out of the situation. The advice that was provided earlier about honesty in messaging (Table 16, p. 143) may be the most appropriate, yet possibly difficult, advice for the communicator to provide to the management team when advising people about what to say about the issue. The model developed in this thesis may also provide communicators with a pathway to guide their organizations through these decisions.

**TABLE 34: Calming Influence**

*Often people are sort of clinging to the ceiling you know worried about the crisis that they face and oh my God what do we do? The senior communications person serves that situation well by displaying some calmness that will reassure people that you know there is a good a proper way to get through this and that at the end everyone is going to be okay you know and regardless of how it plays out. Vice President Communications, Hospital F, Ontario*

*I actually believe when I look back where I've been most effective it's to calm people down you know. It's that you can show the leadership that we can handle this, you know we're doing the right thing, we know how to repair any damage. Like we know we know what we're doing and we know how to react in terms of all those audiences so if the board chair calls in a panic I know how to address it. I know how to call the person who's...the person in the media who's a newspaper columnist who's been chronically missed; I know how to call her you know. I know how to work with the senior group and I think, if there's anything that's important for the senior leader in this area, is to show leadership; calm, focused, strategic. And you want to inspire trust both from the people externally but internally you need someone who's going to be a brick even though you're melting inside. Vice President Communications and Marketing, Hospital D, Ontario*

*What I found is it's the voice of sanity. First of all, it's just being very, very clear about the steps we're following and making sure people ...don't respond based on their emotional reaction and sit them all down and say: "These are the facts." Keep them on the facts and keep them sort of following the plan that we've tested time and time again. Chief Communications Officer, University British Columbia*

*I would probably get pulled into a meeting with a whole bunch of marketing folks and I'd have a legal guy on one side saying: "Nothing needs to be said. We're not allowed to go anywhere on this." And I have a bunch of marketing people on the other side saying: "Uh we could probably do some advertising to refocus people on something...some other area of our business." And that I might have a CEO or maybe somebody senior like an EVP saying: "Hmmm I'm not sure." You know what I mean? So there's and I've been in this situation before where I feel like I'm the only person who has a very clear picture of what really should happen and from a disclosure standpoint so and I think that it's not because I'm smarter or have better perspective than a lot of people. I think it's because I work in gray every day. Director of Communications and Marketing, Corporate Retail Chain, Ontario*

*I guess be calm, and be confident, because there's nothing worse in a crisis situation than people looking to you for leadership and you're frantic. So be confident. Even if you don't know the answer, be confident. Be able to delegate and be able to be calm and rationally think about the answers that you're being given to the questions you're asking. Vice President Communications, University Alberta*

In the next two Tables (35, 36), the participants talked about who they would work with in the management of the disclosure and the role they would play in terms of the lead communicator for their organization. In the first quote below (Table 35) from the Director of the Pharmaceutical Company, she mentioned that she would be a 'key member' of her organization's 'Critical Issue Management Team'. There appeared to be a similar process in the quote from the Chief of Communications at Hospital A. She mentioned that 'everybody sits around a table and determines exactly what happened.' In the last part of her quote she said that the team determined how best to communicate the information. This might be an important point for achieving consensus on the strategy and messaging about the disclosure among the organization's decision-makers. The final quote in the table below echoes the comments of the previous two and she mentioned that she would be brought into the situation if the issue required a more robust communication plan beyond direct disclosure to a patient.



**TABLE 35: Who is on the Team?**

*I think if I'm out there and believe me, I'm dealing with stuff like this almost every day right now. So, I think that, again, at XXXX, I would need to be, or the communicator would need to be a key member of the...what we call the Critical Issue Management Team, which is really just the crisis management team. And so that's kind of where you start from. This team comes together. Director Communications, Pharmaceutical Company A, Ontario*

*Everybody sits around the table and determines exactly what's happened. Clinically they decide what they...I mean they have to disclose, but clinically they determine what has been done to people, if anything. What's the remedial clinical action that could be taken, or the suggestions? And then, once they determine that, it's how best to communicate this information. Chief of Communications, Hospital A, Ontario*

*So the first thing that we would do if this happened here is...there are a number of people who would be informed, right. So the physician or the healthcare worker who discovers this would pull together a team. And that team would include the head of PMH, it would include the Operating Head, it would include our Head of Risk, it would include Patient Relations. And depending on whether people were really... probably depending on the size, it would include me or a member of the department. Vice President, Public Affairs and Communications, Hospital C, Ontario*

What is encouraging from the quotes above is the communicators in these organizations seemed to be involved early on in the information gathering and planning stages of the disclosure (mentioned in Table 33, p. 174). It looks as though the teams that are brought together in the organizations above are multi-disciplinary and seem to include those who are likely accountable for the situation ('Operating Head', 'Head of Risk', mentioned in the third quote), which may also be a positive sign that this organization does not see the issue as one that is the communicator's problem to fix. The role the communicator plays on the team may vary as is demonstrated in the data provided below which is discussed next.

**TABLE 36: Team Leader**

*The best role for me to play...well first of all, I mean depends how many staff you have and what's possible. I would probably try to actually delegate, if I could, the information gathering and the writing to a member of my team, so that I could be more in a consultative role. Because I would say that this would really heighten anxiety with the senior team, and unfortunately in our positions, that takes a lot of energy and time. So if I could have someone on my team be really content driven, and I would review everything, so I would get probably some of the subtleties even talking to the senior team and helping that through. Vice President Communications, University, Alberta*

*I mean the role I play is to be immediately involved. It is to develop the overall strategy in collaboration with my team and to make sure that we get kind of the operational response we need. So sometimes that's an issue...making sure that everybody understands the urgency of timing around these things. Vice President, Public Relations, Health Authority A, British Columbia*

*So you know I do as much listening as possible but when the operator starts presuming what the communications strategy is going to be or you know trying to pervert the messaging potentially that's where I remind him that he's not the communications person, I am, and it's my job to lead that process. Chief of Communications, Lottery, British Columbia*

*You know again, I could see it where you know the legal experts would want to take the lead but I think I think it is you know a public relations issue and legal plays part of that but I think that the PR people you know should be the lead in this and the, what's the word I'm looking for, you know the gatherer of the troops and you know helping to set that team in place and make sure that it's meeting regularly and talking about all the issues and that it's dealing with the situation on a timely and appropriate manner. Director of Communications, Health-based Charity, Nova Scotia*

*I think one of the things is to actually quarterback the crisis communications team...the crisis team. It's not just about communications, about other things you do. But I'm a firm believer that the Head of Communications ought to be the quarterback of this thing. I call it keeping the list, and keeping the schedule. Not necessarily doing everything, because it's a team thing, and different departments will have to do different things. But that's where I always feel is the real optimal role to do. Vice President, Corporate Affairs, Pharmaceutical Company B, Ontario*

Given that everyone interviewed for this part of the research played a leadership role in their organizations for communications, it is not surprising they mentioned the importance of having a practitioner on the 'incident' or disclosure team. However, the level of involvement of the communications lead on the team seemed to vary among the responses. The University VP and the Health Authority VP mentioned that they would provide a 'consultative' or strategy development role. The University VP said she would delegate specific tasks to her team members and she would serve as consultant with the senior team. The Health Authority VP said she would work collaboratively with her team to develop the strategy. In the third quote the Chief of Communications for the lottery spoke about asserting himself at the table as the lead person for communications. He suggested that others in the organization may attempt to 'pervert' the messaging into something that is off strategy.

In the fourth and fifth quotes the, Director of the Health-Based Charity and the Pharmaceutical VP mentioned they would play a broader leadership role to 'quarterback the crisis team' as the Vice President of the Pharmaceutical company said. She mentioned that it was her role to 'keep the list' of things that needed to be done and keep the schedule but not necessarily do everything. In the fourth quote, the Director of the Health-based charity said that the PR person should play the lead on a crisis and gather the 'troops' to help manage the situation. Like the quote from the pharmaceutical VP above, the Director said that the PR person should be tasked with ensuring the team 'meets regularly and talks about all of the issues'. Keeping a task list and meeting scheduling may not seem like a strategic function but in the case of these two practitioners perhaps it helps them stay abreast of the situation and ensures they are kept informed as new information becomes available.

Regardless of the specific duties, the consistency in the responses from these five participants suggested that for them to be effective in the disclosure situation, they would at least need to be at the decision-making table and playing a lead role on the communications function. In the next section some of the challenges communicators encounter at the decision-making table will be explored under the category 'advocates and corporate ethical guardians.'

### 5.3 Practitioners as Advocates and Corporate Ethical Guardians

As is demonstrated in the data below (Table 37), communicators acting as advocates took a number of different forms in the feedback the interviewees provided. In the first quote, the communicator tried to convince her senior team to speak to the media about an issue involving a drug recall but they were reluctant. She was passionate about the issue and attempted to persuade her team to act but they remained steadfast in their refusal to speak openly. In fairness to her senior team, the company in the quote is a global pharmaceutical corporation and the local team in Canada was likely following the directive of a head office that is located out of country.

**TABLE 37: Advocates**

*I tried to be...this one instance I wasn't successful and I think it was a bit to the detriment of the issue, but I was trying to convince the senior management to do an editorial board meeting. Because I just felt that there was something that was really getting out of control, and the management refused to talk to the media about it. And it was sort of, I had to speak to them about it. Which was fine, but I was only allowed to say so much. And it felt that to take...to at least one senior, you know, take the Globe & Mail, and sit down with them, and I know they would have been willing to do it, and say, "Look. This is why we made this decision as a company." Because it did have global impact, and just sort of talk to them about it, and they just refused to do it and I just thought, for trying to be open and accountable and help people understand the organization and do a service to our customers, that are probably asking questions about why we're doing something...the media's the conduit to the largest number of people and I felt that that was probably where we should have gone on that issue. But, unfortunately, that was an example where it didn't work. Director of Communications, Pharmaceutical Company A, Ontario*

*You have to get people on board. You have to mobilize thought. You have to get out there. You have to knock on the doors. You have to listen to what people have to say and somehow create some kind of a meeting ground or you know virtually or physically where people can express themselves and then you look at the common good of the organization and then you make your move. The reality is that you normally have to persuade people at the top. Director of Communications, University A, Ontario*

*I think the optimal role you play is sort of driving the full recommendation. I think that if you are true head of communications and you truly you know "at the table" leading communication and the way that communication is both delivered by an organization and ultimately received by your end constituent, you absolutely should be driving the recommendation and you should be in a position of control on that meaning that even if a CEO disagrees with you because there's very few senior leaders want to go out there and say: "I messed up," and you know, "I've done something wrong," you know but if they have the fortitude to believe what you're saying and listen to advice I think that's one good thing. Director Communications and Marketing, Corporate Retail Chain, Ontario*

*If the information needs you believe the public has are legitimate as expressed through either media or whatever; if you believe they're legitimate but you're under instruction not to release you should be doing your best to convince the powers that be that this is an appropriate place, time, location to release that information. If you can't at the end of the day I don't think you're empowered to do that. It's not your information to give away. You don't own the information so you know it's the Board, the CEO, the executive that have ownership of it and that's their right to say no. Chief of Communications, Lottery, British Columbia*

*Sometimes you have to bow to when the CEO says, "No", or the Minister of Health...or the communications folks in the Ministry say "No, you shall sit on this one." Then we'll sit on it. Occasionally you get proven right, that it does leak out, and the whole thing unravels, and you've got to sort of be smug and sit back and say, "Told you so." But that's how it goes. I always try and give the advice though that I think is the best for the organization. Director Public Relations, Health Authority A, British Columbia*

In the second quote above, the Director of Communications at University A talked about getting 'people on board' in her organization to support her strategy. She saw it as her role to persuade the decision-makers in her organization to address the issue and determine how to respond. In the third

quote above, the Director from the Retail Chain also believed it is the communicator's role to advocate for the recommendation that the practitioner is bringing forward. He said, '...even if a CEO disagrees with you,' the communicator needs to have the 'fortitude' to provide advice that is in the best interest of the organization and what he described as the 'end constituent' or stakeholder. The Chief of Communications for the Lottery corporation also mentioned the role of advocating for the information needs of the public but he said that even though a communicator may do his best to convince the, '...powers that be that this is an appropriate place, time and location to release that information' ultimately, the CEO makes the decision about whether or not to move forward with the disclosure. Similarly, the final quote from the Director of the Health Authority, said, 'sometimes you have to bow when the CEO says, no.'

In the above quotes, the communicators seemed to put forth a significant effort to rally support and convince or persuade their management teams to adopt a disclosure strategy but as the last practitioner pointed out, the communicator does not own the information. The decision to disclose an event will likely be at the discretion of the management team or board and putting forth the best case possible for a disclosure recommendation may be the role of the communicator. The practitioner's role is to advise the management team and if they choose to ignore the advice then there does not appear to be much of an avenue of appeal available. If the communicator finds herself in a situation where her advice on disclosure is ignored routinely, she may want to make a decision about whether or not she has 'value congruence' with the organization.

If a communicator sees her role as an advocate for the public and pushes her organization to release information does that mean she assumes the responsibility of an 'ethical guardian' for the organization and its audiences? In the table below (Table 38) interviewees offered their thoughts on what role the communicator should play in terms of becoming the 'ethical watchdog' for the organization.

**TABLE 38: Ethical Guardians**

*I had the Head of Legal come into my office and sit down and say, "XXX, what do you think we should do now in this situation?" It wasn't "What do you think we should do from a PR perspective or what's your communication strategy or whatever." It was just, "You're involved in this. You know what's going on." I was basically leading the issue, because nobody else was, that was pretty hard, because it was actually leading the issue, plus leading the PR around it. And I thought it was interesting, because I thought you know, he said, "I really care about what the perception's going to be. Like any next step we take on this thing, I want to know what you think." And I thought that's really the ideal role where we should be. It's not, let's make these decisions and do these things, and then deal with whatever PR we want to about it later, or deal with the fallout. But thinking through the possible scenarios on what it's going to impact...how will it impact the reputation? What will stakeholders think? How's government going to react? Really having that full, I guess sort of a 360 thinking before making really major strategic corporate decision. Chief of Communications, Hospital A, Ontario*

*The other thing I think that the role of the communications group is to actually act as the real public conscience of this. And it's not necessarily to set up an adversarial role with whether it's the marketing guys, or the legal guys or whatever that looks like. But it's really to make sure that you have thought about every possible way that this thing could go wrong, or could be interpreted. Because I think that's the role that we have as communications people is to actually go to places where people go, "Oh, I never thought of that." And it would be things like, "All right. We know that there are some bloggers out there in the blogosphere, who don't like pharma companies, and so what are they going to say about this stuff, and how are they going to spin what this is, into something that gets us back into that sort of, dirty, greedy, pharma, trying to abuse the youth of Canada." Because that's where they'll go.. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*'...and he just, he finally said to me: "What are you my conscience? I didn't know I was hiring my conscience." And that is exactly what we are. Vice President Communications and Marketing, Hospital D, Ontario*

*So the communicator has to play that role, and I know that it's tough, I know that it's very scary because everybody's worried if they're gonna get fired, and you know, if they're playing that kind of role, and, but I think fundamentally at the end of the day, our jobs are about managing risk and reputation. And if we can't do that effectively and we can't be confident enough to be that alternative voice, then at the end of the day I would just argue we're not doing our jobs properly. So I think it's absolutely essential to, in fact I would even go so far as to argue it's our moral duty, or even our moral obligation to be that alternative voice in an effort to push the organization into a realm of accountability, responsibility and transparency. Chief of Public Affairs, Hospital B, Ontario*

*A lot of communicators are not guided by their own moral convictions, and what they do is, they capitulate. Despite that little inner voice saying, you know what, this is not quite right, and we shouldn't be doing this, and I wouldn't do it this way, or if I was the patient I wouldn't like this happening to me, but they capitulate because they're frightened. They're frightened of their bosses, they're frightened to speak up, and that fear drives their behaviour. And I think it's really, it's a critical point to emphasize, that we really need, as a profession, to have the courage of our convictions, and to not basically defer moral decision-making to our bosses. Chief of Public Affairs, Hospital B, Ontario*

Common to the quotes in Table 38 seemed to be the notion of the communicators playing an advisory role when an ethical decision has to be made. In the first quote, the Chief of Communications at Hospital A, relayed a story about the head of her organization's legal team seeking her thoughts about the situation about how it will be perceived among other stakeholders. She saw her role as advising on the reputation of the organization. The Pharmaceutical VP in the second quote had a similar understanding of her role. She said it was her job to 'act as the real public conscience' of the bosses. She said the intent was not to be 'adversarial' with other departments but rather to ensure that the situation has been thought of in a number of different ways in terms of its impact on various audiences. She mentioned that it was the role of the communicator to bring the perspective of the audiences to the decision-making table. In the third quote, the Hospital Vice President described a situation where she was trying to convince her CEO to comment on the

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public disclosure of his salary and he finally said to her, 'what are you my conscience?' She believed it was her role to present a plan to comment publicly based on her perception of what would be the right thing to do in the minds of the public.

In the final two quotes from the Chief of Public Affairs at Hospital B in Ontario, he talked about practitioners having a sense of 'fear' around providing the 'alternative voice' or that of the public in the decision-making process. He felt strongly that if communicators were unable to provide a dissenting viewpoint than that of the decision-makers then communicators are not doing their jobs properly. He suggested that it is the role of the communicator to 'push the organization into a realm of accountability, responsibility and transparency.' In his final quote, he said that many communicators are not 'guided by their moral convictions' and they: 'capitulate to the will of management' despite their 'inner voice' telling them otherwise. He said that communicators do not hold to their convictions out of fear of losing their jobs and that as a profession, they should not 'defer moral decision-making to their bosses.' This is an interesting position and it begs the question of why would a communicator believe she is any more virtuous or in possession of a higher sense of morality than that of her boss or entire management team?

L'Etang (2003, p. 64) made the critical point that public relations practitioners are not trained to be organizational ethicists and ceding this responsibility to them is not the best option for a company. Bowen (2008, p. 292) supported the notion of PR becoming an ethical counselor but she admitted that few practitioners have sufficient training to perform this role. Delegating ethical decision-making to one area of the organization and failing to instill a sense of moral obligation among everyone in the organization, as Maclagan (1998) suggested, could be met with dire consequences. Reputation management is not entirely synonymous with maintaining ethical business practice and the arguments in favour of public relations assuming stewardship for the organization's values-based decision making, based on the need to maintain a positive image, has some inherent conflict. It may be that refusing to release information could save the reputation of the organization but does that decision help stakeholders make an informed decision about the situation? It does not help them if

they are never informed about the situation. Saving the reputation of the organization may in fact lead to less ethical behaviour if the decision-makers believe disclosing negative news could have an adverse impact on the organization's public reputation.

What seems to make sense based on the data above is that public relations practitioners in this research used their personal and professional sense of values and ethics, like everyone in the organization, to guide their activities for the betterment of the organization and its publics. This could mean encouraging colleagues and others in the organization to support disclosing information or they could provide public perspective on a problem when others may be too inwardly focused in their discussion of an issue. But to assume the responsibility of ethical decision-making for the entire organization may be an unrealistic expectation for the communicator to deliver. The relevance of this section to the development of a model may be to ensure discussions of strategy are aligned to the corporate values and in the interests of those who need the information.

#### **5.4 Summary**

Data presented in this section related directly to research question three: *what is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?* The data presented here from the interviewees offered insight into the answer to this question. There was a broad range of advice from the participants but the themes presented in the data suggested that communicators may not be able to manage these situations in isolation and they need to develop consensus and support from the most senior levels of the organization to ensure disclosure strategies accomplish their goals. Practitioners in this research said they needed to be involved early in the issue to be effective and cannot be brought in at the last minute to 'spin' the situation into something positive. Although the notion of playing the role of the public conscience was mentioned in the data, it should also be noted that transparency is a shared responsibility for the entire organization and should not be delegated solely to the communicator who as L'Etang (2003) suggested, is ill-prepared and not trained for such a role.

## 6.0 CONCLUSION

A significant amount of data have been discussed and analyzed in this section with the intention of answering this study's main research questions and constructing a model which will assist public relations practitioners and their organizations in making decisions about these potentially difficult situations. The data presented in this chapter have provided the building blocks for an initial model that will be tested in an iterative manner with focus groups. The results of this further research are presented in Chapter VII.

Communicators in this study shared practical knowledge that will assist in creating the model's mechanical elements such as how to develop a disclosure plan including crafting messaging and how to segment audiences as well as the techniques used for reaching them. What was also fascinating information in the data were the discussions participants had about their own ethics and moral codes which guide their decision making and shape their strategic recommendations. It was incredibly fortunate to be able to gain this information from this group of study participants. Their candid conversations about many of these issues have provided interesting rationale and background which has given context to the pieces of this effort that will make up the first version of the model.

As mentioned in the chapter, there were four core categories that emerged from the data: *Weighing and Understanding the Disclosure Issue*, *Generating the Organization's Response*, *Organizational Culture and Disclosure*, and the *Role of Public Relations Practitioners in Disclosure*. These four main themes have been discussed as they related to the construction of a model for disclosure which will be presented in 'step-by-step' detail in Chapter VI. Data from the research participants that led to the formation of the four core categories, offered a healthy mix of practical strategic advice combined with valuable information about how people make decisions about communicating disclosure events. Even though the advice from the interviewees for this study is qualitative and cannot be considered representative in any way of the opinions of a broader population, the data are insightful and provide



a wealth of information which may be used as the foundation for further investigation in subsequent work. In the Conclusion (Chapter VIII), thoughts on further research are provided. In the next chapter, the theoretical elements that surfaced in the data as core categories will be explored and serve as a transition between the analyses of this chapter and the presentation of the first version of the model in Chapter VI.

## V. TOWARDS A DISCLOSURE MODEL

### 1.0 INTRODUCTION

This is an intervening chapter between the interview data analysis and presentation of the first model. This chapter serves as a bridge in the thesis between the discussion of the raw data in the previous section and the more detailed presentation of the model in the next chapter. This section provides an opportunity to discuss broader theoretical influences that will lay the groundwork for the more prescriptive approach that appears in Chapter VI.

Interviewees in the first part of this research drew on their personal values and work experience to discuss how they would manage the fictional disclosure scenarios presented to them. In their feedback, themes such as ethics, power and intuition in decision-making surfaced which merit some further discussion in this chapter (see table below).

Theme	Evidence
Ethical Decision Making	Table 11, 'Ethical Decision-Making' p. 129 Table 16 'Honesty and Avoiding Corporate Speak', p. 143 Table 23, 'Finding Common Ground' p. 153 Table 27, 'Use of Values to Guide Communication' p.160 Table 28, 'Transparency and Consistency in Communication' p. 162 Table 38, 'Ethical Guardians' p. 181
Power Relations	Table 2 'Work your Network' p. 115 Table 14, 'Starting with those who are accountable' p. 138 Table 18, 'Consensus Building' p. 145 Table 23, 'Finding Common Ground' p. 153 Table 24, 'Exterior Constraints', p. 154 Table 29, 'Open / Closed Culture', p. 164 Table 30, 'Tone Setting Role of CEO ' p. 167 Table 36, 'Team Leader' p. 177 Table 37, 'Advocates', p. 179
Use of Intuition	Table 9, 'Intuition and Experience' p. 126

To provide some broader theoretical context for the disclosure communication model, the themes mentioned above will be explored as they relate to ethics and disclosure decision making, power and its influence on organizational communication, and public relations practice including the role of intuitive decision making in communications. These themes are larger concepts, which are not linear or step-by-step directions that can be placed on a model schematic like some of the more directional

steps that participants mentioned such as whom to inform about the disclosure and when. These concepts are however, essential to understanding the rationale for how the framework will be developed and how communicators can use the model as a guideline or reference tool when faced with the dilemma of disclosure.

## **2.0 ETHICS AND DISCLOSURE DECISION MAKING**

In this section, three primary ethical frameworks will be covered with respect to their relation to the data uncovered in the first part of this research. Aspects of deontology, consequentialism, and virtue theory will be examined with respect to how the respondents used elements of each concept in their decision-making about disclosures.

### **2.1 Which Moral Framework is the Best Choice for Disclosure Events?**

When considering what to do with the fictional vignettes used in the interviews, the data showed some of the respondents tackled the problems by examining a number of reference points such as their personal moral sense, their organization's mission, vision and values statements, as well as a company's mission, vision and values and code of ethics (see Table 11, p. 129). As they worked through the fictional vignettes, some of the study participants ran through what they would do in their communication strategies and what would comprise their ethical decision-making (see examples below). Their reasoning showed a variety of moral frameworks such as Heichelbech's (2003, p. 45) description of deontology as the 'golden rule' which he suggested is deontological due to the person's obligation to act toward others in the same manner they would want to be treated (similar to the quote below from the Director of the Health-base Charity). References made to ethical statements found in organizational materials such as corporate values statements could be consistent with the deontological approach to a sense of duty to communicate information as opposed to a personal desire to do so (quote from the Director of the Pharmaceutical Company). L'Etang (in L'Etang & Pieczka, 2006, p. 406) suggested the deontological moral framework describes goodness as intrinsic to an act within the context of a relationship and that this notion is derived from

Immanuel Kant, who argued that a right act was one which was done out of duty and conformity to universal law and not out of inclination. If the corporate culture is prone to disclosing events and has stated policies and procedures for doing so, then the motivation for disclosing information could be viewed as deontological.

**From TABLE 11: Ethical Decision Making p. 129**

*So if there's a medication error for example, or some other kind of medical error, we absolutely...our principle is to disclose to the patient. We would not necessarily disclose publicly, because there's...what's to be gained from that? If there's a particular incident that happened and it has, say a very negative outcome of an individual. That individual has the right and needs to know about what happened. Does it serve any greater public good for the whole world to know about that? I would suggest, in balance, not necessarily.* Vice President, Communications and Marketing, Hospital D, Ontario

*So, from my perspective...and it would help by the fact that we actually have kind of a vision in it, and a mission statement. But for us, our guiding principle in this would be to actually do the right thing for Canadians. And so, we do actually have that kind of the guiding principle.* Director Communications, Pharmaceutical Company A, Ontario

*But if there's one principle I'd always, it would always be that question to say okay you know six months from now at the traditional inquiry and I'm sitting on the stand and they say you know, "What did you know and when did you know it and what did you do about it," am I going to be able to answer that in a way that you know that personally you feel good about but also balance that against what was best for the institution and the organization?* Director Public Affairs, University B, Ontario

*My responsibility as a human being, my first responsibility is to myself. To make sure that I am comfortable with whatever it is that I'm doing. That my...whoever I'm working for is not asking me to do something that's unethical. So if it passes my own ethical litmus test, then my next responsibility is to my employer. And what is that...what is the employer's goal? What are the implications of scenario A versus scenario B, and trying to roll it out one hour, one day, one week, one month, ten years down the road, what are the possible implications?* Director of Communications, Provincial Government, Nova Scotia

*It's different every time. There is no magic bullet and I do think what I found when I'm facing that type of decision is I have to put myself in the shoes of the person on the other end of the table.* Director Communications, Health-based Charity, Nova Scotia

In situations where there is disagreement between the corporate culture and public relations practitioners, there was evidence of advocating for what the practitioner saw as the 'right' thing to do. This type of action seems to be consistent with Aristotle's virtue theory. Heichelbech (2003, p. 45) explained virtue theory in terms of a person's character including their actions and how someone is predisposed to respond to situations regardless of regulations or rules. There was an example provided where a communicator advocated for disclosure based on what she believed to be the most ethical course of action (see Table 37 below).

**From TABLE 37: Advocates p. 179**

*I tried to be...this one instance I wasn't successful and I think it was a bit to the detriment of the issue, but I was trying to convince the senior management to do an editorial board meeting. Because I just felt that there was something that was really getting out of control, and the management refused to talk to the media about it. And it was sort of, I had to speak to them about it. Which was fine, but I was only allowed to say so much. And it felt that to take...to at least one senior, you know, take the Globe & Mail, and sit down with them, and I know they would have been willing to do it, and say, "Look. This is why we made this decision as a company." Because it did have global impact, and just sort of talk to them about it, and they just refused to do it and I just thought, for trying to be open and accountable and help people understand the organization and do a service to our customers, that are probably asking questions about why we're doing something...the media's the conduit to the largest number of people and I felt that that was probably where we should have gone on that issue. But, unfortunately, that was an example where it didn't work. Director of Communications, Pharmaceutical Company A, Ontario*

In addition to deontology and virtue theory, there were also elements of consequentialism revealed in the data. Heichelbech (2003, p. 45) described the consequentialist framework as one where the outcomes of the act are considered above those of regulations. In the quote below the practitioner mentioned that they try to find common ground between what they want to do and what their legal or risk department tells them but they have never avoiding going ahead 'because legal was drawing a line in the sand.'

**From TABLE 23: Finding Common Ground p.153**

*Frankly where I find you have the most conflict is between the legal advice on the risk management side, and communications. And we will push, and they will push. It's a negotiation. I don't think we've ever not done something, or done something I didn't think we should do, because risk or legal was drawing a line in the sand. I think again, it's probably because it's cultural that we're usually able to negotiate the middle ground on what can we do. What can we say, that will meet the bulk of the information and communication requirements without getting us in trouble legally, or with other legislative restraints. Vice President Public Relations, Health Authority A, British Columbia*

L'Etang (2006, pp. 405-406) suggested utilitarianism is 'the greatest happiness for the greatest number' and for a utilitarian, 'good' is defined as happiness and a right action is that which increases happiness by at least as much as any other option open to the agent at the time.' The greatest happiness principle may be the most efficacious approach in some circumstances while in others this approach may in fact prevent a company from being transparent. It is conceivable that the disclosure may not always benefit the greatest number of people but could serve an important purpose. In the quote below, the Hospital CEO opened her organization up to litigation and may have tarnished the reputation of her hospital but she felt the disclosure was the 'right thing to do.'

**From TABLE 30: Tone Setting Role of CEO and Senior Team p. 167**

*We have this history of disclosure. So, for example, I know our risk people would say way back with that oncology incident that we disclosed too much, because I know the CEO didn't bother asking legal for advice. She did what she thought was the right thing and it was right thing. I know there's (sic) people in risk and legal who have long memories, who...they've been kind of cleaning up from that for a long, long time because it obviously did increase the litigation risk. Vice President Public Relations, Health Authority A, British Columbia*

Each of the frameworks may have its limitations when it comes to making decisions about disclosure events. In the next section, combining the approaches to achieve the best results for stakeholders and the organization will be discussed.

## **2.2 Borrowing the Best from Moral Frameworks to do what's Best for Those Involved**

Applying the literal definition of each of the three main ethical frameworks, in exclusivity of the other, may not be the best approach for disclosure situations. Consequentialism could prevent disclosures if the utilitarian theory is applied. Adhering solely to a deontological approach may limit transparency if there is a sense of duty to remain quiet on information that could benefit society. The focus on the self in virtue theory ignores for example the notion of 'moral relativism' that Posner (1998, p. 1642) described as a system of values that is relative to local culture. As Reilly and Kyj (1990, p. 24) suggested, a corporate executive may have a highly developed moral sense as a private citizen but that same executive may exclude those ethical principles in corporate decision making and corporate behaviour. In this case, the moral and ethical private citizen becomes part of the corporate machine that has a different set of values. While in private life, the executive may place a high value on openness and disclosure but in the corporate world her virtues become submissive to the collective values of the organization.

Data from the research showed elements of ethical frameworks played a role in deciding how to develop a disclosure communication strategy. An interesting parallel to this finding comes from Sherwin (1999, p. 202) in her commentary on the work of bioethicists and the advice they provide to clinical staff. She suggested that rather than trying to choose a single theory for all cases, it may be preferable to view different theoretical perspectives as providing alternative frameworks or templates for different sorts of approaches to problems (Sherwin, 1999, p. 202). She mentioned that each theory has a definite appeal and some problems fit best with consequentialist approaches while others work with deontology, and some fit with virtue theory (Sherwin, 1999, p. 202). Sherwin commented that no single moral theory should be used for resolving all ethical issues and instead

they should be used as partial and overlapping resources rather than seeing them as definitive and exhaustive truths (Sherwin, 1999, p. 203).

Managing the communication of a disclosure situation is about making a series of strategic decisions that will ultimately impact the lives of an organization's internal and external stakeholders. Choosing an ethical framework to guide the deliberations of a disclosure communication strategy appears to be dependent on the situation, which is consistent with the advice of Sherwin (1999) and data collected from the research participants in this study. Based on the data in this study, it might be reasonable to suggest that the model developed in this thesis, should be sufficiently flexible to allow public relations practitioners and others in the organization to employ multiple ethical frameworks. The ethically 'correct' course of action will need to be sensitive to a number of factors that are contextually specific such as the potential of harm to publics and the risk to the organization. Disclosure decisions are not straight-forward and a model for developing a strategy for these situations will need to allow practitioners and their teams to consider a variety of ethical points-of-view to determine the most appropriate course of action at any given time.

### **3.0 POWER RELATIONS AND DISCLOSURE SITUATIONS**

There are two main themes around power that have emerged through this study which are worth exploring in greater detail to better understand how they influence disclosure decisions. The first, concerns the management structure of the organization and how the public relations practitioner works with the sources of formal and informal power and decision making in an organization to create and execute a disclosure communication strategy. The second theme is about the amount of power and influence external stakeholders exert on the organization and how this may affect the management of a disclosure situation. Examining these two themes will help in the development of the model by first understanding how public relations practitioners navigate their own organizations to ensure they are clear about the lines of decision-making. A discussion of the second theme, the influence of external stakeholders, will help ensure practitioners are sensitive to the information

needs of external audiences and are aware of the role stakeholders may play in determining a course of action in disclosure situations.

### 3.1 Defining Power and its Relationship to Disclosure

To aid in the discussion of the two themes of power relevant to this study (PR and how it relates to the power structure of the organization and the power of stakeholders on organizational disclosures) it would be prudent to start with a definition of power. There appear to be two primary concepts of power. The first involves the exertion of force or influence to encourage a reluctant person to do something they would not normally consider (Merlo, Whitwell & Lukas 2004, p. 208) and the second includes the notion of building consensus around an idea rather than pressuring a person to act in a manner that is desirable to one party (Lukes in Kesting, 2005, p. 5). Both of these descriptions of power have relevance to the practice of disclosure communication and how communicators operate within their organizations to bring forward their strategies and recommendations.

In the first definition, researchers Merlo, Whitwell and Lukas (2004, p. 208) explained that power is the capacity of a person to get another person to do something that the latter would not otherwise do willingly. In the first phase of data for this thesis, there were examples of practitioners lobbying or persuading decision-makers to choose a path of disclosure (see Table 37 below) but they may not have been successful depending on the reaction of the decision-maker to the argument put forward.

**From TABLE 37: Advocates p. 179**

*I think the optimal role you play is sort of driving the full recommendation. I think that if you are true head of communications and you truly you know "at the table" leading communication and the way that communication is both delivered by an organization and ultimately received by your end constituent, you absolutely should be driving the recommendation and you should be in a position of control on that meaning that even if a CEO disagrees with you because there's very few senior leaders want to go out there and say: "I messed up," and you know, "I've done something wrong," you know but if they have the fortitude to believe what you're saying and listen to advice I think that's one good thing. Director Communications and Marketing, Corporate Retail Chain, Ontario*

*If the information needs you believe the public has are legitimate as expressed through either media or whatever; if you believe they're legitimate but you're under instruction not to release you should be doing your best to convince the powers that be that this is an appropriate place, time, location to release that information. If you can't at the end of the day I don't think you're empowered to do that. It's not your information to give away. You don't own the information so you know it's the Board, the CEO, the executive that have ownership of it and that's their right to say no. Chief of Communications, Lottery, British Columbia*

Lobbying may not necessarily be coercive but if for example the practitioner mentions to decision-makers the threat of negative media attention or reputational damage if the situation is not disclosed



in a manner that demonstrates the organization is taking responsibility for the situation, the consequential and intimidating nature of this method of persuasion could be consistent with the Merlo, Whitwell and Lukas (2004, p. 208) definition of power. There were examples in the study where the interview participants mentioned the power of external stakeholders such as the government that exercised influence over an organization to either communicate or in some instances suppress information.

**TABLE 24: Exterior Constraints p. 154**

*So it is a balancing act, and I guess, how we try to balance that is, first of all are there basic regulatory limitations...risk management limitations. If we all had a dime for every time we wanted to say what was really going on with the patient going wacko with the media, we'd all be quite rich, but we can't. So, we have to operate within the regulatory and legislative constraints. If there's an error...of course, one of the other things that I didn't mention, but one of the other things that we always do is advise the Privacy Information Commissioner's Office right off the bat, too, because they like to know about these things and sometimes they will advise on whether or not they think an aspect of disclosure is either required or not required. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*At the end of the day, we face this on a regular basis with the Ministry of Health folks out here. Where there's a difference of opinion and at the end of the day, they ultimately write the big cheque to the health authority to run the system, so they get to make the call. Even it's the wrong call, or I think it's the wrong call, they get to make that call. So I'll give as much advice as they're willing to hear, and then at some point, you have to accept that they're going to make the decision and you have to stop raging against the machine, or else you'll drive yourself crazy. Director Public Relation, Health Authority B, British Columbia.*

Stakeholder actions such as those in the quotes above are consistent with the Merlo, Whitwell and Lukas (2004, p. 208) definition of power but what is missing from this description of power is the concept of an organization or individual being empowered to communicate out of a moral or deontological sense of duty or social responsibility to a community. Steven Lukes (in Kesting, 2005, p. 5) saw two conceptions of power. The first is similar to the Merlo, Whitwell and Lukas (2004, p. 208) definition where he described *A* affecting *B* in a manner that is contrary to *B*'s interests. Lukes described this as an asymmetrical approach where there is potential for conflict between *A* and *B* (Lukes in Kesting, 2005, p. 5). In Lukes's second definition, he views power as a collective capacity that arises from structures of harmonious and communal organization (Lukes in Kesting, 2005, p. 5). This second definition of power is in keeping with feedback found in this thesis that addressed how communicators work within organizations to build and achieve consensus among leadership teams and other decision-makers to support a disclosure communication strategy (see Table below).

**From TABLE 19: Consensus Building p.146**

*Everybody feels as though their particular position has been taken into consideration. They have to be enunciated and then we say well we as an organization this is what we're going to do in response to this you know so it may not allay all the fears but it will quiet down some.* Chief Communications Officer, University, British Columbia

**From TABLE 37: Advocates p. 179**

*You have to get people on board. You have to mobilize thought. You have to get out there. You have to knock on the doors. You have to listen to what people have to say and somehow create some kind of a meeting ground or you know virtually or physically where people can express themselves and then you look at the common good of the organization and then you make your move. The reality is that you normally have to persuade people at the top.* Director of Communications, University A, Ontario

American economist John Kenneth Galbraith (in Kesting, 2005, pp. 17-18), distinguished three forms of power: condign power which proceeds from threat, compensatory power which is based upon reward or the ability to pay for submission, and conditioned power which is about changing belief through persuasion, education, or the social commitment to what seems natural, proper or 'right'. This third form of power may be most likely relevant to the role of public relations in an organization, which is to build relationships with publics through education and communication (as Heath 2001, p.198, described the strategic function of public relations as 'relationship management'). Conditioned power was mentioned indirectly in the interviews when practitioners talked about what to do in a disclosure situation based on what was 'proper' or 'right' according to their perceived 'social commitment' to the communities they served (see Table below).

**From TABLE 11: Ethical Decision Making p. 129**

*So, from my perspective...and it would help by the fact that we actually have kind of a vision in it, and a mission statement. But for us, our guiding principle in this would be to actually do the right thing for Canadians. And so, we do actually have that kind of the guiding principle.* Director Communications, Pharmaceutical Company A, Ontario

*But if there's one principle I'd always, it would always be that question to say okay you know six months from now at the traditional inquiry and I'm sitting on the stand and they say you know, "What did you know and when did you know it and what did you do about it," am I going to be able to answer that in a way that you know that personally you feel good about but also balance that against what was best for the institution and the organization?* Director Public Affairs, University B, Ontario

*My responsibility as a human being, my first responsibility is to myself. To make sure that I am comfortable with whatever it is that I'm doing. That my...whoever I'm working for is not asking me to do something that's unethical. So if it passes my own ethical litmus test, then my next responsibility is to my employer. And what is that...what is the employer's goal? What are the implications of scenario A versus scenario B, and trying to roll it out one hour, one day, one week, one month, ten years down the road, what are the possible implications?* Director of Communications, Provincial Government, Nova Scotia

*It's different every time. There is no magic bullet and I do think what I found when I'm facing that type of decision is I have to put myself in the shoes of the person on the other end of the table.* Director Communications, Health-based Charity, Nova Scotia

In the next section, I build on the definitions presented and determine how these concepts may contribute to the construction of a model for disclosure communication and decision-making.

### **3.2 From Definition to Practice: How Power Relates to Disclosure Communication**

Concepts of power that Lukes (in Kesting 2005, p. 5) and Galbraith (in Kesting 2005, pp. 17-18) suggested and the relevance to decision making about disclosures have a similarity to the dialectic approach that Plato and Socrates espoused. In dialectic reasoning, one person presents a hypothesis and another person disagrees until a third view is eventually attained and accepted (described in Indick, 2002, p. 25). This conversational or narrative approach to power and decision making is similar to how the participants in this research reasoned with their superiors and others in the organization to build and follow a disclosure communication strategy. The application of this notion for the model may include a step where the communicator recognizes which form of power and decision making exists in their organizations. If the prevailing climate in an organization is one where power is exercised and decisions are made based on conversations then the communicator will need to build consensus for a proposed strategy based on feedback from a number of sources responsible for supporting and implementing the agreed-upon plan. If the other forms of power are dominant in the organizational culture, then the communicator will have to understand who can apply force to either move forward or stifle a disclosure plan.

Understanding how power is used in an organization could benefit the public relations practitioner in developing a specific plan for disclosing information. Merlo, Whitwell and Lukas (2004, p. 208) described four main organizational perspectives on power: bureaucratic, critical contingencies, network, and expert. Recognizing various forms of power in an organizational setting could improve the efficiency in how an organization accepts a proposed disclosure strategy. From a navigational point-of-view, having knowledge of how an organization makes decisions based on its use of power could save time, which is sometimes critical in a disclosure situation.

In a bureaucratic power structure, there is an emphasis on the importance of established processes and rules and standard patterns of behaviour (Merlo, Whitwell & Lukas, 2004, p. 208). The bureaucratic perspective on power sees it as largely determined by procedures, precedents and acceptance of routines (ibid). With the critical contingencies perspective, power among sub-units in an organization is found in the division of labour, ability to cope with uncertainty, substitutability, and centrality of an area to the purpose and decision making within an organization (Merlo, Whitwell & Lukas, 2004, p. 209). In this situation, it would be vital for the communicator to know which areas of the organization have the most power over its strategic direction and how a disclosure strategy may impact this area. A consideration the authors did not mention, and it may be specific to disclosures or the development of communication strategies, is the sub-unit's relationship with an affected public. If a powerful sub-unit has an existing relationship with a stakeholder, who could be impacted by the disclosure information, it would be helpful for the communicator to be aware of the nature of this association to determine how it may affect the strategy. If a sub-unit is dependent on the stakeholder and the disclosure could negatively impact this relationship, there may be reticence to proceed with a strategy that could adversely change the bond between sub-unit and stakeholder.

Merlo, Whitwell and Lukas (2004, p. 210) explained 'network power' as it related to someone's proximity within the workflow of an organization. They suggested that the division of work among hierarchical positions, subunits or even cross-functional teams, creates an interactive network in which those who are more interconnected tend to enjoy more power by virtue of their increased control over task flows, social interactions or communication networks (ibid). In a network, power is based on the ability to act as a central cohesive source, rather than the ability to demand obedience (Merlo, Whitwell & Lukas, 2004, p. 210). This is an interesting concept for disclosure decision-making due to the potential for the network to alter slightly depending on the issue. This is not to suggest that the organization's management or accountability structure will change given different issues. But in the network sense, if power resides with those who are interconnected and able to act as a source of information then, those who are directly involved in the situation may have a greater ability to contribute to the development and execution of a disclosure strategy than in a setting which

has a strict hierarchical sense of power. This notion is important for practitioners to be cognizant of when considering who to consult in the organization when preparing a strategy.

A final perspective on power within the organization stems from experts and the perception within the organization that this person not only has useful knowledge but also that people believe the person is credible (Merlo, Whitwell & Lukas, 2004, p. 211). The notion of experts and their involvement in a disclosure situation was referenced in the feedback from interviewees.

**From TABLE 22: Delivering the Message p. 150**

*I would imagine that you'd have to get in a health official of some kind, somebody who really knows about that kind of thing to come onto the campus and it so happens that one of our deans is a medical doctor. Vice President Public Affairs, University C, Ontario*

*We definitely need to have someone come onto the campus to speak, a doctor of worth you know. Somebody really, really important to come and speak about it to get people the information before it became a huge deal on the campus. Once again, because I know that SARS is not too far in the minds of, the minds of people. Director of Communications, University A, Ontario*

**From TABLE 23: Finding Common Ground 153**

*Yeah. And I think that's probably reflective of the fact that, of course, XXXX would be there, our in-house counsel. I work with her really closely. She's done this for I think over ten years now. She's been here...she is the most sane and sensible person when it comes to, "Here's the legal advice. Here's what feels like the right thing to do. I'm not going to tell you what to do. I can do the technical things that need to be done." So she would phone the CMPA and she would do all that kind of stuff. And she can give us advice. But I think it really...it goes...she doesn't believe she's in control of these things either. She just gives us the legal advice, but she's very wise. And so, I don't see her as adversarial at all. Vice President Public Affairs and Communications, Hospital C, Ontario*

Participants in the study provided examples of their experiences with experts who have organizational power and interviewees said that occasionally the expert became a complementary spokesperson to others in the organization such as the CEO. The role of this person was usually specific to the issue and technical in nature. The application here to a disclosure model is the role the expert could play in providing advice to the organization or information to stakeholders depending on the situation.

In summary, public relations practitioners need to have a thorough grasp of decision-making structures in their organizations to assist them in assembling strategies and to gauge the level of support the organization may have for a disclosure communication plan. Understanding whether an organization has power found mostly in a hierarchy, among a series of sub-units, in a network, with a series of experts or most likely a combination of all of these, could benefit the approach the

communicator takes in developing and implementing a disclosure plan. Knowledge of how stakeholders wield power over the organization and whether or not the company is receptive to sharing power with publics may benefit the practitioner when considering the disclosure strategy.

#### **4.0 INTUITION AND TACTICS: A POTENTIAL QUESTION OF CREDIBILITY FOR COMMUNICATORS**

Public relations practitioners interviewed for this study were some of the most senior level people responsible for communications in their organizations. There was a wealth of practical experience among the 22 interviewees but despite the level of experience among the participants, there were two surprises that emerged from the data. The first was how often the interviewees jumped to the tactical management of the fictional scenarios and the second was the reliance on intuition and 'gut-feel' to approach the management of the fictional scenarios.

#### **4.1 Reliance on Intuition**

In the data gathering, the participants relied on intuition to make decisions about strategy and to form their recommendations to management. The use of intuitive sense could be a symptom of the experience level of practitioners that were interviewed. All of the interviewees operate at a senior level in their organizations and managing these situations may have become routine. Therefore, the familiarity with the topic could be an indication of why there was a reliance on intuition. It is curious why the participants did not spend a large amount of time discussing why the organization should or should not divulge the information but it may be explained by what Indick calls the use of 'non-empirical approaches to arguments' (Indick 2002, pp. 26-27).

Indick (2002, pp. 26-27) described the use of intuition in a practical setting as the application of non-empirical approaches to arguments either by making intuitive judgments or by regarding a judgment as self-evident and therefore free of the need for logical proofs. In this thesis, it may have appeared obvious or 'self-evident' to the participants about what to do to manage the fictional vignettes. The interviewees in this research may be at a point in their careers where reasoning about whether or not

to communicate does not require an intense amount of deliberation or self-reflection (see evidence below of the use of intuition).

**TABLE 9: Intuition and Experience p. 126**

*If I say something, if we don't say something and what are the possible fallouts. So I kind of have to run through it, run through the scenario in my mind from multiple perspectives but I mean it is intuition. It's your sense of right and wrong, it's your gut reaction in some of these situations where you have no time to really thoroughly analyze every possible variation. Director of Public Affairs and Communications, Lobby Association, Ontario*

*I mean it's very much a gut check. I think I think PR professionals need to have a, what I call a street level, an insight into what's going on at the street level and I think that's one of the biggest things...one of the best qualities that they can bring to the job. Director of Communications, NGO, Ontario*

*Listen to your instincts. Go with your first instincts. I can tell you every time I haven't gone with my first instinct, not every time, but when I've gotten into trouble is when I haven't listened to that little inner voice. Director of Communications, Health Based Charity, Nova Scotia*

*I tend to use my intuition an awful lot. So I think experience kind of counts when you've got things like this that are kind of emerging or where at least...for me I call it my spider sense. You sort of get, there's something in you that tingles that says, from an issues management perspective, this needs my attention. Vice President, Communications and Marketing, Hospital D, Ontario*

*Well, it's...I guess it's...intuition's probably a fairly good way of putting it. Sort of having a look at what's happened in the past with these types of issues, and there really isn't a cut and dried thing to say if it's X number of patients, and Y impact, then we will do A, B, or C. It's sort of going on a gut feel. With the number we're talking about, 250 patients, being something...cancer is...everyone knows someone who's been through this. It's in everyone's family or friends, so there's a lot of general public interest. So this is one of those things where, going on gut feel I'd say, "Yeah, this has got some potential to go somewhere, so I'd like to sort of take it up the next notch." And it really is sort of a blend of intuition and experience right at this...Director of Public Relations, Health Authority B, British Columbia*

*I think the sense of intuition comes from knowing the business. So I think one of the things...one of the reasons I think that seasoned communicators seem to have better intuition is because if they're good at what they do, and if they've been with the organization and they're at a good level, they understand the business. So I think that one of the things about how would you would decouple that intuition is really very much about understanding the business itself, and also I would say, understanding the people, like the actual stakeholders. Vice President Corporate Affairs, Insurance Company, Ontario*

Relying on one's intuition to help form a recommendation about what to do may not be the wrong approach but an empirically based model may provide some credence to the communicator's recommendation to disclose information. Using intuition to make judgment calls and decisions is not unique to public relations practice and the people in this research are not alone in their use of instinct in their roles. Indick defends the use of intuition by pointing out for example that entire fields of psychology and psychiatry revolve around the expression of intuitive thoughts by clients which are then interpreted subjectively by equally intuitive therapists and analysts (Indick, 2002, pp. 26-27).

In his book, *The Logic of Practice*, Bourdieu (1990) discusses the idea of 'practical sense', which he describes in the world of sport as a 'feel for the game' where players make intuitive decisions about the ebb and flow of their role in a game (Bourdieu, 1990, p. 66). Similarly, communicators likely rely on their sense of experience and feel for the organization and how publics will react to a situation to

help make judgment calls about communication strategies (as mentioned in the final quote in the table above). However, building on Bourdieu's (1990) sports analogy, athletes improvise their actions with the pace and events of the game but there is usually an agreed upon strategy that the player or team will attempt to follow based on the circumstances. Participants talked about what they would do to communicate the organizational response to the fictional scenarios based on their intuitive sense but this seems to be more a matter of execution and play-making rather than a discussion of the game-plan. In the next section, participant feedback regarding tactical versus the strategic management of the disclosure is discussed.

#### **4.2 Tactical Management of the Disclosure**

In disclosure situations the primary strategic decision is whether or not the information should be communicated and not necessarily how. Answering the question of 'how' to reach audiences is important but the initial questions to ask before jumping to tactics is to be certain the organization is clear about why it is communicating and what is going to be achieved by doing so. The role of the communicator in making an assessment of whether or not to communicate a disclosure was discussed in part during the interviews but it was surprising that there was not more insight provided on this critical step. This could be an indication of the level of involvement the communicator has in the decision making around these issues. Even though it was mentioned in the data that the communicator should be involved as early as possible in the disclosure process, there was not much discussion about their role in deciding whether or not the organization should communicate the information and for what purpose.



**From TABLE 33: Informed Early to be Effective p. 174**

*I think as far as when we should be informed, obviously, right as soon as they know there's an issue. Vice President, Corporate Affairs, Pharmaceutical Company B, Ontario*

*I would prefer to be informed directly at the beginning as soon as it becomes even a kernel of an issue or you know when the first symptom has come up and so we can manage it properly as a potential but not a happening thing. Director of Communications Officer, University A, Ontario*

*Obviously, it's your leadership and of course your communications team which is one of those things when you know there are companies that will bring their communications people into the situation a bit late in the game and... I think we've all, as communicators in our business, we've all gone through the "holy shit" moment where people will bring you in at the 11<sup>th</sup> hour and say: "Okay, fix it," type thing whereas if you had been brought in you know weeks earlier you probably could have had a lot more input and managed the situation better. Director Communications and Marketing Retail Chain, Ontario*

Public relations practice and academia has been slow to examine the area of disclosure. As mentioned in the Literature Review, other areas such as medicine and accounting have looked at the issue of disclosure and they have been quick to develop guidelines detailing how to handle these situations (see Abadia-Barrero & Larusso 2006, Darr 2001, Fallowfield, Jenkins & Beveridge 2002, Gibbons, Richardson & Waterhouse 1990, Holland 2005, Lev 1992). With the exception of a few papers on the issue (see Arpan & Roskos-Ewoldsen 2005, Brammer & Pavelin 2004), public relations research has yet to address this area with a model hence the inspiration for this thesis.

Why has public relations not focused its attention on disclosures and instead placed more prominence on crisis communications? The data in this thesis do not provide much insight into the answer to this question but it might have to do with the timing of the involvement of PR people in these situations. Feedback from the participants mentioned that they wanted to be involved early in the situation and a part of the incident management team to be effective (as seen in the table above), as opposed to being called in at the last minute to put a 'positive spin' on a disclosure situation that has become a crisis.

Looking at the definition of a crisis, it is described as a *'high consequence, low probability event, overlaid with risk and uncertainty, conducted under time pressure, disruptive of normal business, and potentially lethal to organizational reputation'* (Gregory in Jaques, 2007, p. 148). What is interesting about this definition is the time pressure of a crisis. The high demand for information necessitates the need for immediate involvement of a communicator to focus more on messaging and distribution

channels and less on why something needs to be communicated. In contrast, disclosures may have longer lead times and involve decisions about what and how much information to provide. The decision-making involvement of the communicator in helping management decide what to disclose might be one of the core differences between crisis situations and disclosures and it could point to a difference in roles for the practitioner. A crisis such as an oil spill involves communicating immediately what is staring the practitioner and most onlookers in the face and there is little discussion about what information to provide. Disclosures may involve more complex issues that may not be as obvious to the public until the organization chooses to inform them of the situation.

A crisis is difficult for an organization to ignore and in the event surrounding the incident may result in unavoidable public attention. This draws on the immediate need for public relations counsel and the notion of communicating quickly to as many publics as possible. However, in a disclosure the immediacy of a crisis is not always present and the need to inform an affected public may not result in the execution of a robust communication strategy. Instead, the counsel and advice a public relations practitioner may be able to bring to the decision-making table in a disclosure is strategic advice on the nature of the organization's relationship with the affected stakeholders and others who may have an interest in the issue. There is no question that strategic decisions are made in a crisis but there is little room for discussion about whether or not to release the information. In a crisis, if the building is on fire or product tampering has occurred, there is probably little debate about what to communicate. In a crisis, the issue is already or is soon to be public whereas in a disclosure the organization may have more of a choice about bringing public attention to the situation.

Heath (2001, p.198) referred to the more strategic, advice providing role for practitioners as 'relationship management', which he sees as a value-added function that moves away from spin and publicity to concentrate on forging relationships and alliances with publics. In a disclosure situation, the communicator should be providing advice not only on messaging and channels of distribution but also stakeholder considerations, as Heath (2001, p. 198) suggested. Providing this level of advice could allow the practitioner to participate more in the discussion of whether or not to communicate.

By painting a more descriptive picture of the impact and benefit of the disclosure based on stakeholder response, the communicator may gain a larger voice in making decisions and providing advice about the effect a organization will have on its publics rather than a concentration on messaging and suggesting a course of action based on a gut-instinct of what is 'right'.

Communicators in this research talked about their role as advisors to the executive team and how they offered information about publics. They also mentioned how they act as what L'Etang (2003) described as the 'organizational conscience' to some degree but there was little discussion about strategy and what a disclosure might mean to the business and whether or not the decision to communicate would benefit or deter the company from achieving its goals (see table below). It may be a positive sign that business decisions alone did not guide decision-making about disclosure but a more sound understanding and interpretation of the impact on operations may lend further credibility to the advice communicators provide to their senior teams.

Heath suggested that for practitioners to move from tactical functions to more strategic roles they need to become increasingly familiar with business operations, terminology and concepts (Heath, 2001, p. 199). The practitioners in this research seemed to understand their organizations but there was more discussion about tactics than strategy. This could have been a function of a lack of time for the interview sessions. However, it is worth asking how does the practice of public relations ensure it is at the strategic decision-making table to help manage disclosure situations? Heath (2001, pp. 198-199), suggested that more of a focus on stakeholder assessment combined with the technical functions and a view to 'shaping' the perception of the organization with these audiences might help move communicators to a more strategic role but what are the implications for a disclosure model?

**From TABLE 31: Strategic Advisor p. 171**

*Yeah, and filtering all the details that come in, and sort of acting as a strategic judgment... really bringing in all the information and analyzing it, and providing her with the best strategic advice that I can. So she doesn't need to know all the little details. I've got to go through things and figure out what's the important stuff. What really needs to be done? And sometimes it's the little details that are important, and some of the big details are unimportant. Vice President Communications, University, Alberta*

*In an organization this size, or the size you're in, you're never going to know all this stuff, right? I mean you're just not going to. So you have to believe that people are going to do the right thing, and that you're there to provide strategic counsel and advice. But you're not there to tell them how to do their jobs. I mean, essentially this kind of thing is really the job of the Healthcare Team. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*I think there are two ways to do what we do. I think there's the sort of command and control and belief that you put enough policies in place, and you police things often and often people will do what they're supposed to do because you know best. I actually don't think that works at all. I think what works is if you're always the same place to have a discussion, and you always give good advice and you essentially say, "Look, I'm here to support you, not to tell you what to do." Director Communications, Provincial Government, Nova Scotia*

**From TABLE 38: Ethical Guardians p. 181**

*...and he just, he finally said to me: "What are you my conscience? I didn't know I was hiring my conscience." And that is exactly what we are. Vice President Communications and Marketing, Hospital D, Ontario*

*So the communicator has to play that role, and I know that it's tough, I know that it's very scary because everybody's worried if they're gonna get fired, and you know, if they're playing that kind of role, and, but I think fundamentally at the end of the day, our jobs are about managing risk and reputation. And if we can't do that effectively and we can't be confident enough to be that alternative voice, then at the end of the day I would just argue we're not doing our jobs properly. So I think it's absolutely essential to, in fact I would even go so far as to argue it's our moral duty, or even our moral obligation to be that alternative voice in an effort to push the organization into a realm of accountability, responsibility and transparency. Chief of Public Affairs, Hospital B, Ontario*

Offering communicators a model of how to manage and make decisions about disclosure situations may not move practitioners from technicians to strategists but the application of an empirically developed model could demonstrate the field is moving to more of an evidence-based approach to its practice versus the use of intuition. Use of a model might help younger practitioners who can suggest to management and others that their approach is rooted in research, which may give them a more strategic seat at the decision making table and enable them to rely less on 'gut-instinct' and more on a method that has been created by the input of senior level practitioners.

## **5.0 SUMMARY**

This section has explored themes arising from this research that will provide context for the next chapter where the model is described. Based on the evidence and themes mentioned in this chapter, the disclosure model needs to be flexible to allow people to apply different approaches to ethics depending on the specifics of the situation. At the same time, the model will have to help practitioners map the power and influence of internal and external stakeholders on their plans to

build consensus and solicit input for their strategies. Finally, the advice and insight the participants in this research have shared on this topic may reduce some of the guess-work that accompanies these situations which could build confidence among practitioners and enable them to guide their organizations through the uncertainty of disclosure.

## VI. AN INITIAL MODEL FOR DISCLOSURE COMMUNICATION

### 1.0 INTRODUCTION

In this chapter, the interview data and the overarching themes discussed in previous sections have constructed an initial model for disclosure communication. This section provides a ‘how to’ guideline for decision-making and managing the communication of organizational disclosures. Consistent with the Strauss and Corbin (1998, p. 146) grounded theory methodology, the schematic presented here is based on the four core categories that emerged in the participant data (*Weighing and Understanding the Disclosure Issue*, *Generating the Organization’s Response*, *Organizational Culture and Disclosure*, and *The Role of Public Relations Practitioners in Disclosures*). These categories are drawn on throughout this section to build the steps of the model.

There are four main sections of this chapter, each representing steps in this initial version of the model. These various steps are based on data from the four core categories of participant feedback (please also see the Table below that demonstrates how the core categories match the sections of this chapter). The model is presented in this chapter in a piece-meal fashion and then is validated in Chapter VII. As well as the practical explanations of how the model might be applied, throughout this chapter data from participant feedback is drawn upon as is theory from public relations (such as Grunig 1992, Heath 2001, and Toth 2007) and disclosure practices from other fields (such as Darr 2001, Fallowfield, Jenkins & Beveridge 2002, Lamb, Studdert, Bohmer, Berwick, & Troyen 2003).

**Sections of the Model and Headings of this Chapter and their Relation to Core Categories**

Model and Chapter Headings	Relation to the Core Categories
2.0 Information Collection and Stakeholder Identification	<i>Weighing and Understanding the Disclosure Issue</i> and elements of <i>Generating the Organization’s Response</i> that related to identification of publics. Although stakeholder identification occurred in the second core category, for the purposes of the model, it made logical sense to place segmentation in this section (i.e. identify publics before how to reach them tactically).
3.0 To Disclose or Not to Disclose?	Aspects of the core categories <i>Generating the Organization’s Response</i> , <i>Role of Public Relations Practitioners in Disclosures</i> and <i>Organizational Culture and Disclosure</i> contributed to the development of this section of the model where ethical considerations of disclosure are presented in a decision tree to help determine the stakeholder reach of the public disclosure.
4.0 Strategy Development	Data from the core categories of <i>Organizational Culture and Disclosure</i> , <i>Role of Public Relations Practitioners in</i>

Model and Chapter Headings	Relation to the Core Categories
	<i>Disclosures</i> , and <i>Generating the Organization's Response</i> have contributed to the development of this portion of the model. In these sections, participant data cover how the organization manages the communication of the disclosure in the context of its culture and the role of communicators in these events.
5.0 Evaluation	Although there was not a large amount of information in the data about evaluating the Disclosure Strategy, data regarding two-way flow of information between publics and the organization, and the importance of responding to this feedback to alter strategy was mentioned in the <i>Generating the Organization's Response</i> core category.

Before proceeding with a description of the model it makes sense to pause to explain the notion of a model and what it may or may not help practitioners accomplish. Hofstede (1980, p. 15) suggested that when we try to understand social systems we use models, which are lower level systems that enable us to understand and substitute for that which we cannot understand. Disclosure communication is not a system but it does involve an organization making a decision to provide information to an environment where the response from stakeholders is unknown. The model is an attempt to help organizations understand how to make decisions about disclosures and how they may impact a system of stakeholders. Hofstede also wrote about the concept of 'uncertainty avoidance' (1980, p. 117) and he suggested that some cultures that are uncomfortable with the uncertainty of a situation develop methods of planning such as 'management by objectives' to reduce the level of uncertainty in decision making (ibid). Although this model is validated in Chapter VII, it will have to be tested further to determine if it provides any comfort in making decisions about disclosures. The model should be seen as a tool or a reference guide for communicators who find themselves in the midst of a situation where the organization is not certain about how to proceed with providing information to the public. The model is a schematic that can help practitioners sort their thoughts on a situation and make decisions about what communication strategy to recommend to management.

Does the field of public relations need another model? Other planning frameworks have been developed for public relations practice. These frameworks are usually expressed in some mnemonic that encourages practitioners to conduct research, set goals, execute and evaluate. There have

been a number created over the years such as RACE (Marston, 1963) which stands for Research, Action, Communication and Evaluation; RAISE (Kendall, 1992) which means Research, Adaptation, Implementation, Strategy and Evaluation; and ROPE (Hendrix, 1995) which stands for Research, Objectives, Programming and Evaluation. Similar templates have been developed for managing crises such as Coombs's (2007) work and the Canadian Patient Safety Institute's disclosure guidelines (Canadian Patient Safety Institute, 2008) to help clinicians communicate medical errors to patients and families. The model developed in this thesis was created with input from senior level practitioners and it draws on elements of the RACE, RAISE, and ROPE approaches to planning. In this model, research and environmental scanning is conducted, objectives are set, specific strategies are put in place and an evaluation is conducted but there are unique elements of this model that emerged in this research. Unlike the others, this model includes an ethical decision-tree, which attempts to balance the interests of stakeholders and the organization, and there is an approach to segmentation of stakeholders that works to create a supportive chain of information for the disclosure where informed constituencies are put in place to help communicate the information. The model developed in this thesis fills a gap in the communications literature where frameworks and crises templates do not address the specific decision-making that takes place in during disclosure situations. The model in this thesis is an attempt to remove some of the 'guess-work' from managing disclosures and replace it with an evidence-based approach designed for the purpose of disclosure decision-making.

This first version of the model presented in this chapter has been derived through a qualitative process involving 22 interviews with Canadian public relations practitioners and cannot be generalized to a broader context. It is not the intention of the model presented in this chapter to answer every question that could arise when developing a disclosure strategy. A model that exhausts all disclosure possibilities may not be realistic given the specificity of each situation. Instead, the purpose of this model is to be a reference or 'starting point' for practitioners to use when dealing with these issues.

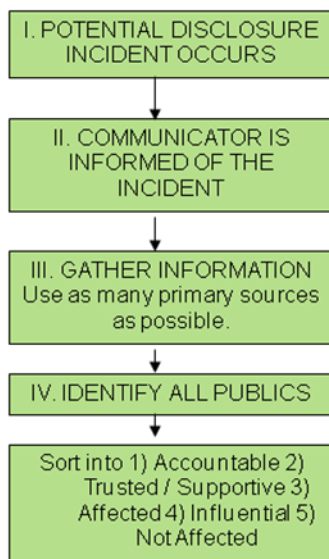


## 2.0 INFORMATION COLLECTION AND STAKEHOLDER IDENTIFICATION

In this first stage of the disclosure model, the first four steps will be discussed including the incident occurring, discovery of the situation, gathering data, and the identification of publics. In this section, topics such as issues management (Seeger, Sellnow & Ulmer in Heath 2001, Heath in Toth 2006), rumour (Eisenberg, Goodall & Trethewey 2007, and DiFonzo, Bordia & Rosnow 1994), and audience segmentation (Grunig 1992, Heath 2001, Toth 2007) are mentioned to provide further background and rationale for the evidence the study participants have offered.

### 2.1 Potential Disclosure Incident Occurs

A potential disclosure incident has to first occur and the communicator needs to be made aware of



this situation in some manner to begin working through the framework. In the Literature Review (Chapter II, p. 22) a disclosure is described as communication that involves management's discretion as to the materiality and significance of the information (Lajili and Zeghal, 2005, p. 138). In this step of the model, there is no consideration for when the incident happened in terms of the immediacy associated with a crisis. A potential disclosure event could have happened in the past or it could be something the organization believes is imminent. Recognition of the disclosure may come from many sources internal or external to the organization but it will have to

be identified as a potential issue to be deliberated and managed. The communicator may become involved either through formal or informal means as is demonstrated in the next step. The motivation to communicate this information is to ensure the public is able to make an informed decision about the situation.

### 2.2 Communicator is Informed of the Incident

Whether it happens immediately or in the past, the organization's public relations lead has to be informed of the event to provide advice about how to proceed with managing the communication of

the disclosure. According to study participant feedback (see Table 33 below), the preference was to be included as early as possible to ensure a robust strategy could be developed. There were various means of becoming informed of the situation, which included being tuned into the organizational rumour mill, establishing an issues management system, and being a member of the senior management team where potential disclosures may be discussed (see Table 1 below).

**TABLE 33: Informed Early to be Effective p. 174**

*I think as far as when we should be informed, obviously, right as soon as they know there's an issue. Vice President, Corporate Affairs, Pharmaceutical Company B, Ontario*

*I would prefer to be informed directly at the beginning as soon as it becomes even a kernel of an issue or you know when the first symptom has come up and so we can manage it properly as a potential but not a happening thing. Director of Communications Officer, University A, Ontario*

*Obviously, it's your leadership and of course your communications team which is one of those things when you know there are companies that will bring their communications people into the situation a bit late in the game and... I think we've all, as communicators in our business, we've all gone through the "holy shit" moment where people will bring you in at the 11<sup>th</sup> hour and say: "Okay, fix it," type thing whereas if you had been brought in you know weeks earlier you probably could have had a lot more input and managed the situation better. Director Communications and Marketing Retail Chain, Ontario*

*Well it depends on how open people are and sometimes people feel that knowledge is power and that there's no need to tell anyone about what may be an emerging issue or you know there still may be a notion that communications doesn't have to know because it doesn't concern them, it's not a communications issue in their view. So that has a great deal of impact, I think, in how professionals can do their work. If people understand that communications should be involved at the outset and very early on or if they find that there is a potential problem, that they talk to their communications colleagues, then I think it's a whole lot easier all the way around but certainly it's a whole lot easier for the communicators to do their job. Director of Communications, NGO, Ontario*

**TABLE 1: Key Informants and Primary Sources 114**

*I think one of the first things that you immediately think about is, where...how do I get the right or the best information. What (sic) are the people that I need to talk to? Who do I need to interact with? Because sometimes someone who's flagging it, you know somebody else said it to someone else to someone else and you're just trying to make sure that you've got the right person. In that initial interaction you're asking them all the right questions, and then trying to figure out where the holes are or where the gaps are that you need to fill. Director of Communications, University A, Ontario*

*I think that speaking to the right people...there may be the physician who's the closest to the patients, and not just the lead; the pharmacist who's closest and most knowledgeable about the medication; there may be sort of a manager that understands the systems approaches, trying to not have extremely lengthy conversations but have good prepared questions ahead of time to ask them the right things. And I would ask, probably from the pharmacy level, what...to send actual protocol and systems documents, because there must be policies and things written down as to what you're supposed to do make sure something's not mislabeled. So you want to just look at those and understand, yes we do have a standard or a policy, or things that are in place. Chief of Communications, Hospital A, Ontario*

*I thought the first thing that I would do is, because the scenario says I heard it through the grapevine...the first thing I would do is try and confirm. And I'm just thinking...yeah, so the first thing I and I'm...the first thought that went through my head is the hospital's probably not going to tell me anything that the residents should know. And so my first call would be to the residents. Vice President Communications, University, Alberta*

*You know you've to be the barometer of this is going to be okay. So I find that actually sitting people down and saying: "Let's just document the information that we know as cleanly and clinically dare I say as possible," and then I think you look at worst case scenarios. Vice President, Communications and Marketing, Hospital D, Ontario*

*I think then you'd probably want to talk to the Head of Pharmacy, just to get a feeling of what's going on within the team. Usually things like this are systems errors, so you have to be really careful not to try and make it seem as though you or any of the senior team are out on a witch hunt. So it's just trying to understand better, what may have actually occurred to create the problem...to actually make something be labeled incorrectly. And get as clear an understanding as you can, what processes are really in place to make sure that doesn't happen. They don't happen every day, so usually...what might have been the misstep that made that process go off the rails. And then what individual, sort of the lead already thinking about in terms of making sure it doesn't happen again. Vice President, Communications, Hospital F, Ontario*

Rumour mills may be an effective network for communicators to tap into to be informed of issues.

Eisenberg, Goodall and Trethewey (2007, p. 259) suggested these informal communication networks in an organization are the fastest way information travels through a company. Kimmel (2004, pp. 15-17) commented that unlike the formal network of communication in an organization, which involves the more structured transmission of information through channels such as newsletters and staff meetings, grapevine interactions may consist of casual conversations that take place in lunchrooms, and phone conversations. Kimmel stated that there is potential for communication among all participants in an organization and information tends to flow rapidly through the grapevine (Kimmel 2004, pp. 15-17). Both Kimmel (2004, p. 18) and Eisenberg, Goodall and Trethewey (2007, p. 259) suggested that in reality, most rumours have at least some element of truth and should not always be dismissed as idle gossip. DiFonzo, Bordia, and Rosnow (1994, pp.50-51) built on the idea that rumours should not be dismissed lightly by suggesting this type of information tends to come from a collective concern that is of interest to a stakeholder. To stay in touch with informal communication, it

may be important for communicators to have an effective internal and external network to stay informed about issues that could be of concern to the organization.

Staying in touch with informal channels inside of the organization through the aid of hallway conversations is important but a more sophisticated approach to addressing concerns as they arise is the concept of issues management. Seeger, Sellnow and Ulmer (2001, p. 156) advised that organizations concerned with preventing potential crises should monitor the environment for emerging issues that could pose a threat to the organization's operations or achievement of their strategic goals. In disclosure situations it may be likely that the issue will arise internal to the organization but it might also be prudent to scan the environment for situations that could cause the organization to consider communicating something that has been disclosed by another group. For example, a multi-organizational clinical trial of a blood pressure medication reveals a small cluster of patients in one institution who experience an unexpected side-effect. The side-effect is disclosed to patients and it runs as a story on the evening news. The public relations practitioner picks this up on her media scan and sends the story to a group of physicians conducting a similar study at her hospital. The investigators discover a consistency among their patients and the issue is further disclosed. In this hypothetical case, effective issue management led to the discovery and disclosure of the situation. The communicator was informed of the incident by identifying the issue externally and involving the appropriate people to manage the situation.

An important consideration for this step in the model is for the most senior public relations practitioner in the organization to be part of the executive leadership team and for the members of this group to understand the value communication has to offer. Although this is not a step in the model, a communicator referring to this model should be cognizant of how to at least access the senior team or decision making body to provide advice about the disclosure issue. If the communicator is not a member of the senior team and has no access to the executive levels of the organization, this could be an opportunity for her to demonstrate value and educate the executives about the importance of communication in a disclosure situation.

### **2.3 Gather Information**

Once the incident occurs and the communicator is made aware of the situation, the next step in the model is for the practitioner to access sources who are most knowledgeable of the event. There are two main purposes for this. The first is to uncover the pertinent facts, free of any distortion that may accompany receiving second or third-hand information from those who have perhaps heard a rumour about the situation. The second is to determine what, if any, institutional memory or experience may exist with this issue including what has been done in the past and what can be done differently this time to improve the management of the disclosure. It was suggested in the data that it is important to talk directly, if possible, to people involved to ascertain the most relevant information, which will begin to form the basis for a recommendation to management (see Tables 2 and 3 below). In addition to ascertaining the facts of the situation, this step will give the practitioner an idea of the number of publics involved and how complex the communication requirements are going to be. In this stage it is vital for the communicator to gather as much information as possible to inform the remainder of the plan. This is not a 'one-time' step in the model. Instead, this portion can be revisited throughout the process to obtain more information as the situation develops or changes. Those most familiar with the situation can be used as a source to help the organization reach out to the audiences. It is crucial in this step for the practitioner to establish a rapport with those who are conversant with the situation to continue to inform the communication plan as it is developed.

**TABLE 2: Work your Network 115**

*I would liaise with...let's say it's VP of Marketing and Sales, I would see if there was really some kind of low level intelligence gathering that we could do through the sales force. And maybe not widespread, but maybe speaking to a couple of Regional Managers to see if there are other things that we should be aware of that are of a similar nature, or what have they heard. Are there things happening in their markets? Again, just very low level...just to get that intelligence if you will. Director of Communications, Pharmaceutical Company A, Ontario*

*So I would get in touch with all those people who I've...who are sort of my normal contacts, and both with the Student Health Center, the Medical Director, whoever the medical leadership is over there, to find out what the status of the situation is. With the senior residence folks, to find out what's going on over there, in terms of what they know about the students who've come down with it. Are there other residence buildings where they've got some kids that may be presenting, or feeling the same kinds of symptoms that haven't presented yet to the health center that they should be. Vice President, Communications, University, Alberta*

*So every day that I'm making good contacts around my institution with people who may not be, kind of related to the day to day stuff that I do, but I'm keeping good working relationships going. That's like money in the bank. Whenever stuff like this happens, and it does, in places that you and I work right now, you've kind of got those relationships. You know that you can call up that person, they can call you. Director of Communications, University A, Ontario*

*I would be talking to the doctors, making sure I've got my...I've got the information accurate. I would be talking to our infectious disease people to make sure that I've got that information accurate. And I would be using our university registration system, make sure that I have...not that I'm not publicizing the student's names, but in my back pocket, I need to know all the details about these students. And so their name, what faculty they're in, what program they're in, what age they are, what hometown they're from, all these sorts of things. So I would have that in my back pocket. Chief Communications Officer, University, British Columbia*

**TABLE 3: Precedent Setting Cases 118**

*Just because it's an incident, it's not necessarily a crisis, but it is an incident, or an adverse event, in our case. And then, again for me it would be gathering all the facts, taking a look at the previous product history on this thing, and issues around the product. Director Communications Pharmaceutical Company, Ontario*

*I'd certainly want to know immediately the last time we had something similar like this how did you handle it? Did that work, didn't it, what did we learn from it and so how do we think that should inform what we want to do going forward? Director Communications and Marketing, Retail Chain, Ontario*

*What I was trying to mean by that was, what would the current cultural issues that would be occurring. So, in other words, if there had just been another extremely big identity theft issue with another company that had backfired, or it had gone negatively, how...what could we learn from that? Chief Communications, Lottery Corporation, B.C.*

*I would definitely look at precedent, and see how has the organization handled this kind of problem before, and look at the method and the approach and the tools that they used and the style that they used to address the issue. I would listen very carefully for what the CEOs reaction was, if I even had access to him, because a lot of junior folks don't even have access to the big guy. But I'd listen very carefully and watch to see the signals that come from that office in terms of how to deal with the issue. Vice President Communications, University, Alberta*

*I probably...usually what I do is a little bit of Googling as well to see what sort of benchmark's been set by other people in similar situations as well. To see if there are things that resound, but mostly I tend to do those things internally, and fortunately or unfortunately, based largely on my own experiences and intuition. Director, Public Affairs and Communications, Lobby Association, Ontario*

*I would go to obviously senior people at the university and address that question of precedent and talk about what we did last time on a comparable incident and then have a discussion about whether we think that it's on all fours with the current situation, whether the times have changed or the circumstances are different enough and so that would be the first people that I would go to really discuss it with them. Vice President Public Affairs, University C, Ontario*

*I would look at past learning and experience. I would absolutely look at the legal stand on it as well and past models. What models have been used in the past? What has this company used in the past, and what have other companies used in the past? Vice President, Corporate Affairs, Insurance Company, Ontario*

## 2.4 Identify and Prioritize Publics

Now that the facts of the situation have been gathered, it is important for the practitioner to identify who will be affected with the situation and determine the level of priority they may have for receiving the information. Defining these groups enables the communicator to target information based on the needs of the stakeholders, if these are apparent, and ensures everyone who has to know about the situation is contacted in a methodical order that allows the organization to manage the disclosure.

One of the challenges in this section is determining who constitutes a public. Pieczka (2006, p. 297) described segmentation as, '*a technique of breaking audiences into a number of more tightly defined groups relevant to the problem at hand in order to craft communication so that it takes account of the specific characteristics of these groups.*' What is helpful about this definition is the recognition of the need to identify more tightly defined groups based on the problem. L'Etang (1995, p. 125) also offered caution to avoid stakeholder analysis that leads to prioritizing audiences which only serves the needs of the organization. Drawing on the above advice from Pieczka and L'Etang, the model in this thesis includes considerations of groups based on the issue and their needs for information and support.

Once publics have been identified, the communicator needs to sort them into some order to time the dissemination of information. A theme that emerged in the data was to ensure those responsible for managing or responding to the disclosure know in advance of those who may be outside of the organization (please see Table 14 below). The rationale provided in the data for this flow of information is to ensure the organization is resourced and informed to handle inquiries from the affected parties. In addition, it was mentioned that it would be a courtesy to notify those people internal to the organization in advance of informing those outside of the organization. The reasoning was to be considerate of those who could be the subject of criticism depending on what is disclosed.

Based on the study data and the academic influences referenced in this thesis, this initial version of the disclosure model provides a prioritizing mechanism to help practitioners sort publics. In the

'disclosure stakeholder pyramid' (see diagram below), publics are sorted by the ideal sequential notification that takes place in a disclosure. The pyramid represents the path the participants suggested to inform people. At the top or its narrowest point, there may be fewer publics involved and as the communicator moves down to the wider portion of the figure, the potential for more publics to be involved is greater. As well as the chronology of communication, the pyramid represents the level of accountability for the situation with the greatest level at the top and moving to groups with the least amount of accountability for the incident at the bottom.

At the top of the pyramid are those who are accountable for the disclosure situation. Those accountable would consist of an organization's board of directors and senior leadership for example. External groups such as a government or regulating bodies tasked with ensuring public safety may also fit into this level. Publics found in the 'Accountable' tier are most likely be notified first and will potentially have the obligation of speaking with audiences further down the pyramid to provide context for the situation. These groups will need to have detailed information about what has happened including the impact on the organization and stakeholders and what steps, if any, the organization is taking to manage the situation.





**TABLE 14: Starting with those who are Accountable p.138**

*I think for sure, we'd be...well, my focus would be internally right away, because as I've learned in the hospital environment, if the internal people aren't organized, the external piece is going to fall apart. So, for sure, the CEO or the business head. For sure, medical and drug safety; for sure, quality assurance, and for sure, again, in the XXXX case, we're a global company so our global parents, for lack of a better term, would need to know about this. So that the internal key stakeholders are aware. Director of Communications, Pharmaceutical Company A, Ontario*

*So first the senior staff, then all staff, in a very tight way. If it gets to be this extensive, and you're going to be doing something proactively to media, there might be some key officials that you need to just FYI about what's occurred and the processes you're putting in place to make sure it doesn't happen again. Even board, probably key board and foundation members, because that will definitely be something that will come up, and they need to know how to respond externally. Vice President Communications, Hospital F, Ontario*

*Well, we just kind of know our priority audiences I guess. We work really closely with the provincial government. On any given day, we have daily media issue calls with the government, all of the health authorities, and the government public affairs bureau. We have a call every morning where we talk about the issues that are in the media that day. We really try and have kind of a system response to those things. So the bottom line is government is a huge audience for us. So they need to know that we're on top of the situation. What our plan is for communications, what our messaging is. Vice President, Public Relations, Health Authority A, British Columbia*

*Our Board...from an internal management perspective is a very involved Board. And so we always make sure that they are totally informed about what's going on...that sort of thing. And then really, it's getting into the real audience of the actual patients who experienced the error, and the impact of that, and the public. Director of Communications, Health-Based Charity, Nova Scotia*

*Yeah. I would say we would do governance...so yeah, you could call that sort of the governance level...Board and government in terms of an update, and the strategy and the messaging, and then actually rolling out to the...I guess sort of the primary audiences actually impacted by the error. Chief of Communications, Hospital E, Ontario*

*I'd sort of probably role it out as the...our internal team needs to know so that they can make a decision then as far as containing a situation on campus it's whoever's affected so if it's a building etc then you know all the students and all the faculty at that one particular building need to be aware. We would advise the rest of the campus what's going on right away and probably simultaneously would have another chunk of the team talking to the health authority. Chief Communications Officer, University, British Columbia*

*I'm wondering if the professional association needs to know about it and needs to participate sort of licensing side of it and make sure that they all understand what's going on and then not kind of cascading down from that would be the media and then the public through media to understand. Director Public Affairs, University B, Ontario*

*We actually have a checklist, so that always helps us. And so, in terms of this, the very first people we would call would be Health Canada, because by...what we'd heard is that we've actually got these sort of six adverse events that have just been reported so we would make sure that before anything else happened...we've only got a 24 hour window to actually report those, and so that would absolutely be the first...so that's kind of the first thing is, let's make sure we report these things, and don't get so hung up on solving the crisis that when the reporter calls Health Canada they go, "We don't know anything about these." Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*I guess the only other thing that I feel real passionate about in terms of a culture thing, is that employees hear this first. Because that is the biggest thing that I really think...because this has to happen. And I think I just put it last on my list, but that would be one of the other things is that, let's make sure the employees hear about this before it gets somewhere else. My rule always is make sure the employees know everything first. And that's one...depending on how the communications group is structured, that can be easily done, if it's all in the same area. Vice President, Communications and Marketing, Hospital D, Ontario*

*And then I guess the other checklist is for me, are all the audiences who are going to be pissed off to wake up and read about it tomorrow in the Globe, have they been informed? And that would include our Board, our senior management team...depending on what it is...well really, the senior team I think, and then our Foundation Board. And also, I do a fair amount of work...we do a fair amount of work with the Minister's office. Vice President, Public Affairs and Communications, Hospital C, Ontario*

In the 'Trusted/Supportive' level, these groups could include an organization's employees, industry associations, experts or partners outside of the company who may be able to provide advice and counsel about the situation to the organization and its publics. In this group, the organization may

have an existing relationship with the public and is able to confide in them for guidance. For example, a company that manufactures clothing in a developing nation decides to be transparent about the working conditions in its factories and reveals that it has uncovered incidents where their supervisors have used child labour. The company puts an immediate stop to the use of underage workers and it may choose to explain this to a non-governmental organization prior to public disclosure of the issue. The company has an existing relationship through its philanthropic work with UNICEF (United Nations Children's Fund) and seeks this organization's advice to understand the issue and learn how to avoid future occurrences. Informing an impartial but trusted body in advance of communicating to audiences, who appear further down the pyramid, may educate the company about the issue and possibly create an ally to help communicate the situation.

At the next level of the pyramid, the 'Directly Affected Publics' are those groups that the organization's disclosure situation will likely have the greatest impact upon (please see table below). These publics may have a relationship with the organization, such as patient, client, or shareholder that could intensify as a result of the organization releasing the information. The practitioner should identify groups who are at high risk as a result of the incident such as those who may have purchased a defective product. These groups will include those who will benefit most from the information to help them make an informed decision about their well-being. Ideally, this group is informed once the company has its 'response infrastructure' in place such as phone-lines, informed front-line staff, webcasts, etc. According to the participants in the study, once the notification of this group occurs the organization should prepare to respond to audiences in the next levels.

**TABLE 15: Directly Affected Publics p. 141**

*The most important thing at the end of the day is your patients and how you communicate to those individual patients, because they're the ones that were personally affected. They're the ones who you have to be open and honest with. So if you're focused on how to best communicate to those individual patients, then things kind of flow out from there. So obviously, I think the media are very high on the priority list...it's the most effective way to manage your message and to get the information out accurately and proactively.* Chief of Communications, Hospital A, Ontario

*When I think of prioritizing, I think about people first and are people at risk? In my head, I sort of visualize a bit of a spider web with (those affected) at the middle, and I think about who's in contact with them.* Vice President Communications and Marketing, Hospital D, Ontario

*I mean the principle around that I think is that the person...the people who have the right to know the information are the individuals involved. They have the right to know what happened, what actions have been taken to stop it from happening again. And really any questions that they have about it.* Director Public Relations, Health Authority B, British Columbia

*Let's say for example, that you were taking a very value-driven sort of disclosure you know inspired approach whereby you believe that this is absolutely something that you should let people know. Well I still believe that those people that are most affected need to know if it's possible to isolate them, they should have the very first understanding and one on one discussion or whatever format that is. And then secondly I think your customers probably in the online world and there's various vehicles of communication you can use to get to them whether it's an e-mail listing that you have or it's a database of your users, that sort of thing. And then I guess the third level of public would be your general customer base so if you're a company that has both bricks and mortar and online, that sort of thing, then you're probably going to want to let your general customers know as well. And again, I think that they're driven by that assessment but those are the audiences that I certainly identify initially.* Director Communications and Marketing, Corporate (Retail Chain), Ontario

*The information needs of your audience is that tiered approach. Obviously the 100 people who have their profiles compromised, their needs are far more urgent than somebody who has maybe used your company maybe twice in the last couple of years or something like that and they're not compromised so it's the realistic prioritization and the fact that you know you really have to get those requirements taken care of first of all and then you sort of start addressing your secondary or tertiary requirements that to come clean and say you know: "This went on and we want you to know about it but you're safe now," or those types of messages.* Chief of Communications, Lottery British Columbia

*I've used grids in the past and I think I would colloquially calling it a most affected grid. So who are the audiences who would be most affected? And I would measure it that way. So, for example, employees...the most affected first. So, in other words, if you are a front line call centre person, and you're going to be taking calls from the customers, we would obviously need to update them first. Is there a Board of Directors for the company? So do that due diligence as well. And then go on to the affected customers and all customers, Joe Public through public relations, but I would look at who would be most affected first.* Vice President Corporate Affairs, Insurance Company, Ontario

*Well, I guess I would look at it in terms of perhaps concentric circles. I would probably start really small and as need expand. And in a way, if you look at sort of like a classic crisis issues and management model, and if you look at red light, yellow light, green light...green light is your monitoring, yellow light is you've got an issue...something has emerged, and then crisis is full blown.* Chief Communications, Hospital E, Ontario

In the 'Not Directly Affected but Influential' category, groups who are not as personally impacted with the information as the previous group but who may wield influence over other stakeholders in the pyramid. These publics could include journalists and media outlets, politicians or community leaders, and special interest groups. What differentiates these audiences from the 'Trusted/Supportive' public, is their relationship with the organization. These groups would not likely be targeted for early notification due to either their previous involvement or lack of experience with the organization. Politicians, special interest groups, media, may in fact be a member of the 'Trusted/Supportive' level but it is dependent on their linkage to the organization and whether or not the organization believes they can be helpful in the disclosure situation and trusted with the information. Through their public

persona, these groups can shape the perception of others such as coverage of the incident on the evening news or a public figure offering an opinion about the event. If these groups are aware of the situation and the organization believes they have the opportunity to comment on the situation the communicator may want to consider proactive communication with this group to inform them of the steps the company has taken to manage the situation.

Taking a proactive or reactive communication strategy with this group is an important decision point and there are risks to both approaches. In a reactive style, the organization could appear defensive and not consistent with the proactive steps it has taken in identifying and communicating with audiences in the previous steps. Proactive disclosure with this group could draw unnecessary attention to the issue if there is no need to inform those beyond the directly affected publics. Data were presented in the study that seemed to favour a proactive approach (see Table 12, p. 134) but this could depend on the reaction of previous groups in the pyramid and whether or not there is a need to inform those who may not be directly affected. The decisions about whether or not to disclose will be discussed in the next section but for the purposes of identifying influential audiences, the communicator should make a list of these groups and begin weighing the pros and cons of reaching out to these publics.

Audiences in the 'Non-Affected Publics' are groups of people who may have no direct connection to the issue but may have a future interest in the organization. This group could represent future customers or decision-makers who could impact the organization and its business. These publics may be somewhat ephemeral with their current interest in the event but could form a lasting opinion based upon the actions of the organization. For the purposes of planning, the communicator may choose to only identify this group as an amorphous 'general public' that may read about the story in the news or hear about the situation from a friend for example.

Although the planning frameworks that were mentioned at the beginning of this chapter (p. 208), RACE (Marston, 1963), RAISE (Kendall, 1992), and ROPE (Hendrix, 1995) include some method of

sorting and prioritizing publics they do not do so based on the need to create supportive constituencies as is the case in the disclosure pyramid. For example, the ROPE method prompts practitioners to prioritize publics by their degree of influence, prestige, power or perhaps need and their level of involvement with the organization (Hendrix, 1995, p. 11). The last two criteria, 'need' and 'level of involvement' are close to the method proposed in the pyramid process but there is no specific mention of how to sequence the timely communication to these groups to ensure there are informed publics in the levels of above (accountable and trusted supportive) who may be able to assist in the disclosure and ensure others levels are informed.

Monitoring the actions and behaviours of publics throughout the situation before, during and after the disclosure is important for the practitioner to understand the changing stakeholder environment. The stakeholder disclosure pyramid is intended to create a series of informed audiences at each level of disclosure to ensure that levels such as accountable and trusted/supportive can support the communication to groups further down the diagram. The pyramid is designed for pre-disclosure planning purposes and more testing will be needed to determine whether or not it is an effective tool for either pre or post segmentation of audiences. Communicators should take care to remember that publics are not static and their involvement in the disclosure could change as the situation evolves.

### **3.0 TO DISCLOSE OR NOT TO DISCLOSE?**

Now that the communicator has been informed of the incident, gathered all of the relevant information, and identified and sorted audiences, the next step is to decide whether or not to disclose the situation. It is also important in this stage to determine how far down the stakeholder disclosure pyramid organizational messages will need to cascade. To help the practitioner make a recommendation about what to do next, a decision-tree will be used which poses a series of questions and offers 'yes' or 'no' responses that lead to a suggested recommendation of proceeding or halting the process. This section of the model is a significant point of separation from what would be found in the RACE, RAISE and ROPE approaches to planning mentioned earlier. None of these

frameworks include a decision-tree that prompts the practitioner to contemplate ethical considerations in formulating a recommendation about whether or not to communicate information.

As in other sections of this model, this area does not represent an exhaustive list of questions that could be posed about the situation. There may be other points worth raising about the issue but this line of inquiry may assist in generating further discussion about the disclosure with the communicator and other members of the organization. The questions listed in this section are based on the themes that emerged in the study data and will require further testing to determine their usefulness in an actual disclosure situation.

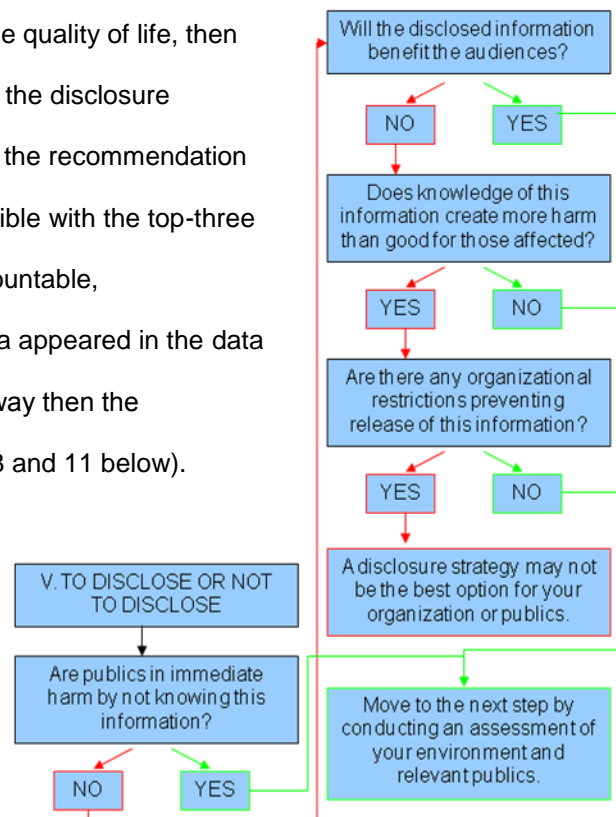
### 3.1 Are Publics in Immediate Harm by Not Knowing this Information?

Asking whether publics are at risk of harm by not knowing this information is a sensible place to start.

If the disclosure information can save or impact the quality of life, then there should be no dithering about the decision. If the disclosure information can ensure the safety of a public then the recommendation should be made to communicate as soon as possible with the top-three levels of the disclosure stakeholder pyramid (accountable, trusted/supportive, and directly affected). This idea appeared in the data and it was mentioned that if a public is in harm's way then the organization should proceed (please see Tables 8 and 11 below).

As mentioned in the Literature Review (p.76), Kaufman, Kesner, and Hazen (1994, pp.35-37) offered a series of questions for organizations to consider before disclosing information and they begin their five questions by asking if non-

disclosure could be 'fatal or lead to further injury'. Similarly, if the answer to this question is yes, they advised that the disclosure should take place immediately. The remainder of their questions are



mostly in the interest of the company such as asking if it can 'absorb the cost of the disclosure strategy'. The model in this thesis attempts to integrate as much as possible the needs of stakeholders for information.

**TABLE 8: Weighing the Risk of Communicating 125**

*I think, the bottom line is, again as a communicator, my sort of litmus or gut would be balance, balancing the risk of communicating, and balancing customer needs, but also communicate. Like, you know, you do say something. Even if you don't know everything, you have to say something, and I would err on the side of disclosure. Director, Public Affairs, University B, Ontario*

*How do we see this happening? Given everything that I know, and understand about the environment around us, about what's happening in the world, in the country, in the province, in the city...given all those things, which sounds like a lot, but as somebody who's in this field, you know that goes through your head in a moment. You think, okay, how is this going to play out, how is that going to play out. So my responsibilities are to me, to my employer. If there's a way that I can get a portion of the information out, a minimum amount of information out, and I hate to say this...distract the audience with other information...then I will do that. Vice President Corporate Affairs, Pharmaceutical Company, Ontario*

*So there are all those factors at play, in terms of deciding what you need to do. So in some cases, when there have been minor, the risk has been so low to be non-existent, and there's nothing that can be done anyway, we have chosen to disclose at the next appointment. If we think we can't find people, then we have chosen to public...you know, to disclose to who we can, and then go public looking for those people. Vice President Public Affairs and Communications, Hospital C, Ontario*

*You're probably going to take into account the legal risks and do that assessment and you're probably going to acknowledge all of that and you know cover off those bases as quickly as possible but you're probably not going to dwell on that as much as you dwell on the fact that your customers are going to lose faith in you and that you have to do the right thing and if they decide...and the question is not if we don't say anything will we get away with it. That's one question you can ask. Customers or organizations that are truly driven as customer focused will probably ask the question if we don't tell customers won't it be worse if they find out about it from someone else versus us. Director Communications and Marketing, Corporate Retail, Ontario*

**TABLE 11: Ethical Decision Making 129**

*So if there's a medication error for example, or some other kind of medical error, we absolutely...our principle is to disclose to the patient. We would not necessarily disclose publicly, because there's...what's to be gained from that? If there's a particular incident that happened and it has, say a very negative outcome of an individual. That individual has the right and needs to know about what happened. Does it serve any greater public good for the whole world to know about that? I would suggest, in balance, not necessarily. Vice President, Communications and Marketing, Hospital D, Ontario*

*So, from my perspective...and it would help by the fact that we actually have kind of a vision in it, and a mission statement. But for us, our guiding principle in this would be to actually do the right thing for Canadians. And so, we do actually have that kind of the guiding principle. Director Communications, Pharmaceutical Company A, Ontario*

*But if there's one principle I'd always, it would always be that question to say okay you know six months from now at the traditional inquiry and I'm sitting on the stand and they say you know, "What did you know and when did you know it and what did you do about it," am I going to be able to answer that in a way that you know that personally you feel good about but also balance that against what was best for the institution and the organization? Director Public Affairs, University B, Ontario*

*Or, would I prefer a physician to come to me and say, XXXX, look, we made a mistake, you know, we're really, really sorry, it's just one of those things that happens but be reassured it's not gonna affect your treatment, or it's not gonna harm you in any way. It was just a little hiccup, and, you know, this is what happened, this is what we're doing about it, and, you know, we just apologize for that. So, would I prefer that approach or for the hospital never to have even told me about the mistake? And I think I would prefer, for me personally, I would prefer for the hospital to come and tell me that there was a mistake and to reassure me, particularly from the clinician's side, that there's obviously not going to be any further problems or issues associated with that mistake. Chief of Communications, Hospital B, Ontario*

*My responsibility as a human being, my first responsibility is to myself. To make sure that I am comfortable with whatever it is that I'm doing. That my...whoever I'm working for is not asking me to do something that's unethical. So if it passes my own ethical litmus test, then my next responsibility is to my employer. And what is that...what is the employer's goal? What are the implications of scenario A versus scenario B, and trying to roll it out one hour, one day, one week, one month, ten years down the road, what are the possible implications? Director of Communications, Provincial Government, Nova Scotia*

*It's different every time. There is no magic bullet and I do think what I found when I'm facing that type of decision is I have to put myself in the shoes of the person on the other end of the table. Director Communications, Health-based Charity, Nova Scotia*

### **3.2 Will the Disclosed Information Benefit Audiences?**

To answer this question, the practitioner will have to know what information the audiences involved in the situation deem to be beneficial or relevant. If there is an existing relationship with the organization that can demonstrate a pattern of what publics consider useful, the communicator may be able to answer this question with some degree of accuracy. Information gathered from the preceding steps, where the practitioner talks to those in the organization who are involved with the situation, may illuminate the needs of various publics. There was a suggestion made in the data to contact someone directly affected to test messaging and gauge what the response might be but this could be risky (see below). If the reaction of the consulted party is less than favourable it could force the organization to implement its strategy earlier than expected if the information is leaked.



**From TABLE 17: Ensuring Messaging Meets Audience Needs 144**

*I think it's always important to get the opinion of the patient and I know some people would be reluctant to get that because you know with the fear that okay there's a whole potential legal piece to this and protecting the hospital and the organization but I think that you need to involve the public that is impacted and in this case that would be the patients so the patients that were affected and potential patients so I think I'd have them as a source. Director of Communications, Health-based Charity, Nova Scotia*

At this point in the decision-tree, the answers are subjective and pose a challenge for communicators to interpret the thoughts and attempt to anticipate the needs of stakeholders whom they may have never met. The difficulty of making a decision about disclosing information when the situation is not clear is not unique to the public relations field. It was shown in the Literature Review (Chapter II, pp. 36-37) for example that even though healthcare is often pro-disclosure when something has gone awry such as a medical error, staff may be less forthcoming when the information publics may find beneficial is somewhat murky. For example, terminally-ill patients may not be in 'immediate' harm but it was demonstrated that some physicians have a difficult time disclosing prognoses for palliative patients, even when it is apparent that people may have little time left (see Fallowfield, Jenkins, Beveridge 2002, Fried, Bradley & O'Leary 2003, Gordon & Daugherty 2003).

To answer the question in this section, it may be best to weigh on the side of providing more than less information and allowing publics to decide what is beneficial but this will need to be done within reason. The information provided should allow the public to make an informed decision about how the situation impacts them but care should be taken to avoid unnecessary disclosure of too much information. There were suggestions in the data that 'full disclosure' does not necessarily mean airing all of your dirty laundry in public.

**From TABLE 16: Honesty and Avoiding Corporate Speak p. 143**

*It's not about airing your dirty laundry and just sort of exposing how poor of a performer the organization of the hospital might be. It's about saying that this stuff happens and sometimes things go wrong. We want to learn from that and add it to the pile of things that we learn from and keep going. Vice President, Public Affairs and Communications, Hospital C, Ontario*

**From TABLE 25: Searching for the Happy Medium 156**

*The one thing that I've reminded folks about around here, for sure, and maybe it's even related to frontline staff, is that the word disclosure does not necessarily equate to full public disclosure. Vice President Communications, Hospital F, Ontario*

*We have a bias towards disclosure and openness, but I also believe that doesn't mean you just automatically hang all your dirty linen in public and the key requirement is the balance of the benefit, public and the patients in terms of the disclosure. Vice President, Communications and Marketing, Hospital D, Ontario.*

The communicator needs to find a balance between what the organization is willing to release and what information the audiences need to manage the situation (see Table 25 below). In doing so, the communicator should point out to management the pros and cons of providing too much or too little information with respect to reputational damage if the organization is seen as dismissive. An executive team may be reluctant to divulge anything that could compromise the organization's future business when the information may not be of any immediate benefit to the audience or the management of the situation.

**From TABLE 25: Searching for the Happy Medium p. 156**

*I don't think it's about communicating too much information. But I think it's understanding the audiences and what they need to know. Because sometimes...like if you're a sales rep, you really just need to have...like one of the top three things this physician's going to ask me, and how am I'm going to answer these things, and do I believe in the answers. Director Communications, Pharmaceutical Company A, Ontario*

*I think we're so close to it sometimes that we want to be like here's everything right, whereas the average person's like: "I don't need to know that level of..." you know and even the donors, I was surprised, right? You know they're like: "I just need to know what happened, how did it happen and that you're taking steps to prevent it." Director of Communications, Health-based Charity, Nova Scotia*

*Can we over-communicate? Yes, I think that in certain instances we can. Particularly when it comes to, not corporate information which people are entitled to and should have, but perhaps in terms of the way decisions are made internally, and the internal credibility and integrity of executives within the corporation or the hospital. You know, sometimes I think we tell way too much in terms of those kinds of personal issues, and we bring personal issues into the foray which opens individuals up for singling out or personal attack, which very often I don't think is required nor necessary. Chief of Public Affairs, Hospital B, Ontario*

*The one thing that I've reminded folks about around here, for sure, and maybe it's even related to frontline staff, is that the word disclosure does not necessarily equate to full public disclosure. Vice President Communications, Hospital F, Ontario*

*We have a bias towards disclosure and openness, but I also believe that doesn't mean you just automatically hang all your dirty linen in public and the key requirement is the balance of the benefit, public and the patients in terms of the disclosure. Vice President, Communications and Marketing, Hospital D, Ontario.*

### **3.3 Does Knowledge of this Information Create More Harm than Good for those Affected?**

Similar to the challenge in the previous question, this one asks the communicator to make an assumption about whether or not the information could cause more harm than good to those affected. The decision point around this question hinges on the presence of harm instead of creating an informed public but it is a question the organization should consider when making a decision about disclosing information. In this question, the emphasis is on the ability of the organization to create harm such as public panic by releasing information that may not be useful to the audiences.

Interestingly, Beck (1992, p. 27) commented on the challenge of explaining risk and with respect to hazards suggested that they are never reducible to mere statements of fact. As part of their constitution, they contain both a theoretical and normative component (Beck, 1992, p. 27). An organization will likely have to make a presumptuous decision in communicating risk to people based on the balance of the theoretical and normative or actual risk however this is defined. This may not be an easy decision and may involve some level of assumption on behalf of the organization to determine the influence the information could have on a stakeholder or audience.

There may be an element of utilitarianism practitioners could draw on as a reference in how to answer this question. By subscribing to how L'Etang (2006, pp. 405-406) described utilitarianism as 'the greatest happiness for the greatest number' it may be reasonable to consider the impact the information will have on an audience and how the majority of the population may perceive the information. The exception with this principle is if the potential for harm is present and if this is the case, regardless of the number of people involved, it would be prudent to inform even a small amount of people to ensure their safety.

Whatever the situation, the intention of posing this question in the decision-tree, is to ensure the organization is acting with the best interests of the stakeholder in mind. As discussed in the Literature Review (p.76), Kaufman, Kesner, and Hazen (1994, pp. 30-33) suggested that full disclosure in every situation may not be a *panacea* and in some cases organizations may do more harm than good when they provide too much information. As mentioned in the data above (Table 25): *full disclosure does not necessarily equate to full public disclosure.*

### **3.4 Are there any organizational restrictions preventing release of this information?**

There may be restrictions on an organization and its ability to release the information it would like to disclose. If there are legalities or legislation preventing the organization from making the information public then it might be a fairly brief discussion at the executive table about whether or not to

communicate (see Table 24 below for examples of external constraints). However, this question was placed at the end of the decision-tree deliberately. If at this point the organization has compelling evidence to release information but it runs into a policy or procedural roadblock that could restrict the disclosure, a longer discussion may occur at the executive table about proceeding with the dissemination of the information regardless of the constraints.

In this step, the communicator should be aware of the constraints that exist on releasing the information to form an accurate recommendation to management about the risks involved if a decision is made to flout an industry regulation or law. In the event where a question about the legality of an action is raised, it would obviously be responsible for the practitioner to consult the professional opinion of corporate counsel or a retained lawyer. An organization may make a decision to ignore any constraints if a greater societal good is at stake or it may simply comply with whatever restrictions are in place and choose not to disclose the information. It will be important for an executive team to understand the consequences of this action versus providing people with details of the situation. The practitioner may be able to provide value to this debate by offering insight into stakeholder concerns and public perception of the organization's decision to either disclose or not disclose. If there are no restrictions on the organization, legal or otherwise, then the likely course of action, given the responses to the previous questions, could be to proceed with the disclosure.

**TABLE 24: Exterior Constraints p. 154**

*So it is a balancing act, and I guess, how we try to balance that is, first of all are there basic regulatory limitations...risk management limitations. If we all had a dime for every time we wanted to say what was really going on with the patient going wacko with the media, we'd all be quite rich, but we can't. So, we have to operate within the regulatory and legislative constraints. If there's an error...of course, one of the other things that I didn't mention, but one of the other things that we always do is advise the Privacy Information Commissioner's Office right off the bat, too, because they like to know about these things and sometimes they will advise on whether or not they think an aspect of disclosure is either required or not required. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*At the end of the day, we face this on a regular basis with the Ministry of Health folks out here. Where there's a difference of opinion and at the end of the day, they ultimately write the big cheque to the health authority to run the system, so they get to make the call. Even it's the wrong call, or I think it's the wrong call, they get to make that call. So I'll give as much advice as they're willing to hear, and then at some point, you have to accept that they're going to make the decision and you have to stop raging against the machine, or else you'll drive yourself crazy. Director Public Relation, Health Authority B, British Columbia.*

#### **4.0 STRATEGY DEVELOPMENT**

There are four main pieces to this section: Situation Analysis and Goals, Messaging, Stakeholders and Tactics, and Culture & Validation. This section is similar to the approaches to planning

suggested earlier such as RACE, RAISE and ROPE. Wilson (2001, p. 216) mentioned that the four step process to planning which includes research, planning, implementation and evaluation, are well-known among 'most practitioners' so it may not be surprising that these steps were revealed as an approach in the data for this research. Each of the steps explained here will help the communicator develop a detailed description of what to do to implement the strategy should the executive team approve the execution of the plan. Evaluating and determining the success of the disclosure is discussed in the next section.

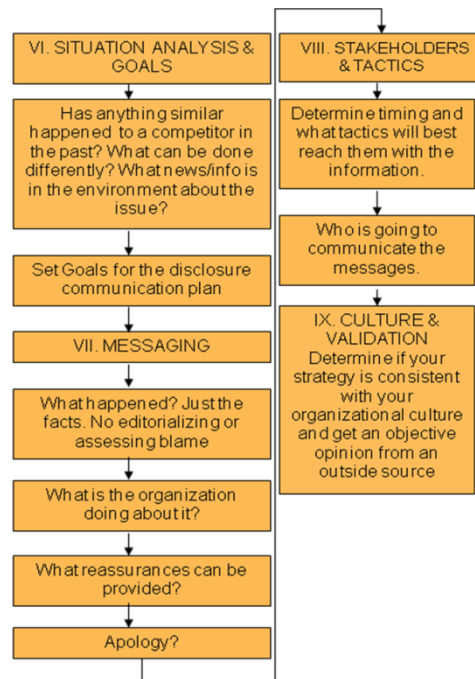
#### 4.1 Situation Analysis and Goals

In the information gathering step earlier in the model, the communicator interviewed people internal and possibly external to the organization to obtain all of the facts about the situation. During this step the practitioner should get a sense of what is happening in the environment and among the organization's stakeholders that could influence the development and implementation of the plan. As

Wilson (2001, pp. 216-217) suggested, it may be important to set goals for the communication plan to understand what the strategy should achieve and be able to offer management an idea of the strategy's intended outcomes.

Similarly to finding out if the organization has dealt with this issue in the past, there may be an advantage to searching for a precedent setting case. Offering management some intelligence of what other organizations have done in like-circumstances may strengthen the communicator's recommendation by

pointing out what worked best and what may be avoided in this situation. If a competitive company was recently embroiled in a similar issue and chose to disclose information reluctantly and was criticized as a result, the communicator may want to recommend the organization be as forthcoming



as possible to ensure the company acts in an open and honest manner with its stakeholders (please see Table 3 below).

**TABLE 3: Precedent Setting Cases p. 118**

*Just because it's an incident, it's not necessarily a crisis, but it is an incident, or an adverse event, in our case. And then, again for me it would be gathering all the facts, taking a look at the previous product history on this thing, and issues around the product.* Director Communications Pharmaceutical Company, Ontario

*I'd certainly want to know immediately the last time we had something similar like this how did you handle it? Did that work, didn't it, what did we learn from it and so how do we think that should inform what we want to do going forward?* Director Communications and Marketing, Retail Chain, Ontario

*What I was trying to mean by that was, what would the current cultural issues that would be occurring. So, in other words, if there had just been another extremely big identity theft issue with another company that had backfired, or it had gone negatively, how...what could we learn from that?* Chief Communications, Lottery Corporation, B.C.

*I would definitely look at precedent, and see how has the organization handled this kind of problem before, and look at the method and the approach and the tools that they used and the style that they used to address the issue. I would listen very carefully for what the CEOs reaction was, if I even had access to him, because a lot of junior folks don't even have access to the big guy. But I'd listen very carefully and watch to see the signals that come from that office in terms of how to deal with the issue.* Vice President Communications, University, Alberta

*I probably...usually what I do is a little bit of Googling as well to see what sort of benchmark's been set by other people in similar situations as well. To see if there are things that resound, but mostly I tend to do those things internally, and fortunately or unfortunately, based largely on my own experiences and intuition.* Director, Public Affairs and Communications, Lobby Association, Ontario

*I would go to obviously senior people at the university and address that question of precedent and talk about what we did last time on a comparable incident and then have a discussion about whether we think that it's on all fours with the current situation, whether the times have changed or the circumstances are different enough and so that would be the first people that I would go to really discuss it with them.* Vice President Public Affairs, University C, Ontario

*I would look at past learning and experience. I would absolutely look at the legal stand on it as well and past models. What models have been used in the past? What has this company used in the past, and what have other companies used in the past?* Vice President, Corporate Affairs, Insurance Company, Ontario

As well as looking for examples of what other organizations have done, it may be helpful to provide an analysis of the general level of understanding for the issue among publics and what the current perceptions are about both the situation in general, if any exist, and the organization (see Table 5 below). Having a good idea of current perceptions of the issue among stakeholders may inform the next step when specific messaging is drafted. It will also give the communicator some sense as to how much education about the issue will be required and how existing misconceptions about the issue may be overcome.

For the purposes of messaging, which will be mentioned later in this chapter, it would also be helpful to know if the audiences may be generally aware of the vocabulary used to describe a situation.

Conducting an issue assessment and analysis as the situation relates to publics listed in previous

steps on the disclosure stakeholder pyramid will help paint a descriptive landscape for the executive team and help them understand how the circumstances may be perceived through the eyes of various audiences. Knowledge of how people think and act about the disclosure issue, may assist the senior leadership team make a decision about the next steps and it will point out potential risks for the organization with respect to negative feedback from audiences.

**From TABLE 5: Public Sensitivity to the Issue p. 121**

*It has to be a priority so whether or not action is actually taken is maybe the second question but the first one is you know let's get through it, let's understand it and let's make informed choices about how to move forward and that's the priority. Vice President Corporate Affairs, Pharmaceutical Company B, Ontario*

*Competitor issues around this kind of product, and again, the media environment. Has there been stuff in the media? Has the media heard about this? And I think, again, for us specifically, the criteria for assessing the situation from a communications perspective would for me be very much dependent on the level of risk assessed by our medical folks. I think the other thing about the messaging though goes back to like kind of what's the environment around this product? Does anybody know about it? Is it in the media? Is there a lot of attention? Are there issues around it? Because if no one's ever heard of it, it's not being used, it's not on the radar, that's going to influence a) the extent of your communication and b) the messaging. Director of Communications, Pharmaceutical Company A, Ontario*

*It depends on the gauge that I have already established with what is of interest to the community. What is of interest to the local media? Chief Communications Officer, University, British Columbia*

*I once read a case about Dow Chemical, which decided to report every chemical spill they ever had in Sarnia. So finally, when they really had a big one, pretty much people kind of ignored it because they'd been telling them all this time about it. So I think, I mean, you know this as well as I do, sometimes when you put it in a news release, it automatically becomes less newsworthy, right? Because journalists think, "Well, if I didn't discover it, then if they're telling me, how can this possibly be important?" Vice President, Public Affairs and Communications, Hospital C, Ontario*

*Well, I think you want to consider what's going on within an industry or a sector. Are there any political or economic factors at play? For example, six months ago was another company involved in a similar situation and they didn't...and depending on how that company responded they were subject to criticism, and so it's shone a negative light on the whole sector. Well, maybe that would prompt our company in this case, to be more proactive in certain strategies. Director of Communications and Marketing Corporate, Retail, Ontario*

Practitioners may want to consider setting some goals or objectives for the strategy which will help focus the plan and give a sense to the executive team of what is intended and how the strategy may be measured. Kelly (2001, p. 287) described goals and objectives as, 'goals are general statements that express broad desired results whereas objectives are specific statements that express results as a measurable outcome.' At this point in the plan's development the communicator may only be able to articulate some high-level goals for the disclosure such as: 'the disclosure strategy will work to position the organization with publics as a responsible corporate citizen that is providing as much information as possible to allow people to better understand the situation.' A specific objective for the plan may not emerge until more information is becomes available about the situation but if there is a sufficient amount of detail about the circumstances and needs of the audiences.

It may not always be possible to quantify the impact of disclosure communication on an organization and its publics. Unlike Kelly's requirement for an expression of a quantifiable outcome of communication strategies (Kelly 2001, p. 287), it might be as valuable to conduct some qualitative research to determine the success of the disclosure such as feedback from callers to a hotline the company has set up or comments left on a company's corporate website. Evaluation will be discussed in more detail at the end of this chapter but the important point is to consider some high level goal to focus the development of the strategy.

## **4.2 Messaging**

At this stage in the model the communicator should start sketching out what the organization's messaging around the situation will be, based on the research on stakeholders and the situation collected and the goals and objectives set in the previous steps. Crafting the key messages will set the tone for the disclosure and will give the executive team an idea of how the communicator would like people to discuss the situation. This section of the framework describes for the user what information to focus on in drafting messaging such as the facts of the situation, what the organization is doing about it and whether or not an apology should be issued with the communication (please see tables below for data on message development).

When providing advice on developing messages, participants in the study suggested that people stick to the facts, be honest, avoid self-serving language, describe what is being done to correct the situation if this is applicable, offer assurances that the situation will not happen again, and apologize if the organization has committed some kind of wrong doing. This advice is consistent with the discussion in the Literature Review (Chapter II, pp. 68-78) regarding how organizations should disclose information. Public relations authors such as Pratt (2004), King (2003), Coombs and Holladay (2002) and research from healthcare (Liebman & Hyman 2004, Wu 1999) reflect some of the elements found in the data the interviewees for this study provided. The data and literature will be drawn upon to better explain this step of the model.



**TABLE 16: Honesty and Avoiding Corporate Speak p. 143**

*I think I genuinely think people will believe you if you try to do the right thing. You know it might be the Pollyanna in me but I do think it's worse to try to pretend that you haven't done something than to just come clean and say we made a mistake. Vice President Communications and Marketing, Hospital D, Ontario*

*I think I would go back to your values, your corporate objectives and your vision, mission and values as every well established organization has those and should be either guiding principles so if you're formulating messages I think that there's the criteria has to be honest; the criteria has to be it has to be clear and I think that the criteria has to be, it can't sound like marketing speak and you can't turn this bad situation into a positive. I think you just have to acknowledge it's a bad situation and let the honesty speak for itself and that's the first sort of, when you're looking at the criteria that's sort of the way I would you know sort of think about it. Director Communications and Marketing Corporate (retail chain), Ontario*

*It's not about airing your dirty laundry and just sort of exposing how poor of a performer the organization of the hospital might be. It's about saying that this stuff happens and sometimes things go wrong. We want to learn from that and add it to the pile of things that we learn from and keep going. Vice President, Public Affairs and Communications, Hospital C, Ontario*

*So I guess I'm thinking that disclosure, it really has to occur within a spirit of cooperation and good will. I mean we have to be truthful, we have to be seen to be truthful, and the information that we disclose, it can't seem forced or done under some sort of obligation. It has to be very humane. It has to be very real. Director Public Affairs, University B, Ontario*

*I'm a believer in we share the facts, this what it is we found out, how we found out, what we're doing about it, what we're going to do about it and when's the next time we're going to tell you what we're doing about it. These are the facts and this is what we're doing about them so that if anybody looks at what we're doing they can't criticize us in any way responding inappropriately. I want us to be seen as honest, I want us to be seen as forthcoming, not spinning and those types of things. Director Public Relations, Health Authority B, British Columbia*

*I guess my first reaction is kind of to walk in the steps of those that have been impacted and say okay how can we rectify this with each one of those stakeholders and how can we first of all communicate it, secondly apologize for it and thirdly, how can we rectify it or prevent it from happening again. Director Communications, Health-based Charity, Nova Scotia*

*When we've dealt with these kinds of things the communication that occurs often is very sensitive; sensitive in the sense that we have recognized that the information being provided to a patient could be concerning or causing anxiety or whatever it might be. But your messaging should be pretty tight, and the tone of things needs to be in context of where it is. You know, no one knew, people didn't die, it was...there was a system that was in place, and they found that error very quickly...so there are some positive messages to communicate. Vice President Communications, Hospital F, Ontario*

From the information the communicator collected in the gathering step and the analysis of the environment, there should be a solid foundation for developing some key messages about the incident and the organization's response. The study participants suggested telling as much as possible about the situation, telling it truthfully, and avoiding any hyperbole about the situation or the organization's efforts to resolve the problem. Pratt (2004, p. 19) suggested that stakeholders will downplay or consider the information to be suspect from a corporation if the communication is 'self-serving good news'. Consistent with the study data, Pratt (ibid) made mention of an organization presenting both sides of the issue in its materials to demonstrate that the organization recognizes the issue is present and that there may be multiple points-of-view on the topic. Communicators preparing messages may want to consider acknowledging both sides of an issue and focusing on what the organization is doing to rectify the situation.

**TABLE 17: Ensuring Messaging Meets Audience Needs p. 144**

*I think it's always important to get the opinion of the patient and I know some people would be reluctant to get that because you know with the fear that okay there's a whole potential legal piece to this and protecting the hospital and the organization but I think that you need to involve the public that is impacted and in this case that would be the patients so the patients that were affected and potential patients so I think I'd have them as a source. Director of Communications, Health-based Charity, Nova Scotia*

*I think there's a long answer to that question about how to formulate the messages and it's a process of thinking through you know all angles of the communication would help land the messages and if ...and of course then you're thinking about stakeholders as well. There would be some messages that are very obvious and consistent for all audiences but there are others that may be customized for audiences so a patient may have a set of messages coming from a certain source whether it's a clinician or hospital that could or may be different from messages that would be delivered to the general public. Vice President Communications, Hospital F, Ontario*

*That is always kind of always in my mind as I'm crafting messages, right, in terms of how do we show what this means to people; individual people on a human level and how do we say that without compromising our reputation and if it is a situation where I'm going to have to suck it up and take a hit then to me it's factual. Director of Public Relations, Health Authority B, British Columbia*

*You have to look who is the audience that you're touching with these messages. Sometimes there are different messages for different audiences. Like, for instance, there might be more detailed messaging, a lot more information for, for instance, the patients that were affected and again with staff than there would be to the general public. Vice President Public Affairs and Communications, Hospital C, Ontario*

In the Literature Review Chapter (pp. 76-77) Coombs and Holladay (2002, p. 165) and King (2006, p. 135) advised that the response from the organization in a crisis should match their level of responsibility for the incident and avoid a defensive posture for the situation. Liebman and Hyman (2004, p. 22) from a healthcare setting, echo this sentiment and suggest that when disclosing a medical error, the needs of the person receiving the information have to guide the content of the message. Meaning, the organization or individual providing the disclosure communication will have to be cognizant of the information needs of publics by either anticipating them, as discussed earlier with mention of the 'golden rule' or evidence from a previous relationship with the stakeholder, or be able to ascertain what the public will need to know as the situation unfolds. If the public requests more detail on the situation, the decision will have to be made to either provide or not provide the information but in this step, the communicator can suggest what she believes the optimal level of information may be for each level of the stakeholder disclosure pyramid.

In the next two boxes on the flow chart 'what is the organization doing about it?' and 'what assurances can be provided?' the opportunity for the practitioner is to explain how the organization is managing the situation and what may be done to prevent future occurrences. Answering these two

questions to help shape the messaging emerged in the data and the questions are similar to the guidelines Wu (1999, p. 971) suggested in disclosing medical errors to patients and how Coombs and Holladay (2002, p. 167) described how a corporation should respond to a crisis.

Should the organization apologize in its messaging? The feedback from the interviewees (Table 18 below) and the literature are consistent in suggesting that an organization should include an apology in its communication if it is responsible for the incident. Communicators who are trying to decide if there should be an apology for the situation should determine the level of accountability the organization has for the situation and if some form of wrong doing has occurred, the organization may want to apologize. In the Literature Review Chapter (pp. 71-72), Hearit (2001, p. 502) provided four criteria for organizations to consider apologizing for their actions: accidents, scandals, product safety, and social irresponsibility where the company acts contrary to societal norms. In these cases, the communicator may consider advising the executive team to offer publics an apology for the action. There was mention of the tension between legal advice and a recommendation from a communicator to issue an apology, where saying sorry could be an admission of guilt but it was mentioned that the apology should happen if the organization is at fault.

**TABLE 18: Apology p. 145**

*And we would apologize. We definitely apologize. I know sometimes in hospital land, the legal folks are all over you, not wanting you to actually accept liability. But the bottom line is when you disclose to the patients, we very clearly apologize for having made the error.* Chief of Communications, Hospital A, Ontario

*This is a particular situation but when people are in a bad situation I think what the public wants to know is: 'A' transparency about there's been a mistake; and 'B' that you're very sorry and you realized it's had an impact on people; and 'C' that you're doing something to you know limit it happening again.* Vice President Public Relations, Health Authority A, British Columbia

*Oh my God, mea culpa, let us you know share the pain and you know the wounds that we have.* Vice President Communications and Marketing, Hospital D, Ontario

Once the communicator has developed a series of messages that explains what has happened, what the organization is doing about it now and to prevent future incidents, and has contemplated the level of responsibility the organization has for the event, the practitioner should then consider how and when to reach stakeholders with the messages and who is going to deliver the information. These topics will be discussed in the next section.

### **4.3 Stakeholders & Tactics**

In this step, the communicator should think about how the messages will be delivered to the audiences including what tactics will be employed to reach groups. The timing of implementation should be considered in terms of when various publics will receive information, and who the organization is going to use as a spokesperson and how feedback will be received.

Data collected from the participants suggested the best way to reach out to audiences may be a function of the time available as well as the method the organization has always used to reach out to them (please see Table 21 below). Meaning, if publics are used to receiving information from the company in a certain way, then it makes sense to continue this method in a disclosure situation, assuming the tactics will satisfy any level of urgency that may exist. There were suggestions made in the data to communicate in as many different ways as groups use to access information about the organization. There was a wide variety of tactics mentioned from briefing notes to inform those accountable to e-mails to get in touch with staff and others, to web postings on social media sites, and news releases to reach broader audiences. The tactic should match the nature of the message and more efficient techniques such as electronic and broadcast communications should be used when there is a pressing need to inform the audience.

**TABLE 21: Tactics Determined by the Ability to Reach Audiences p.149**

*So whatever you know effective means of communication is and I think at that point you know it's kind of hard to assemble all 300 people in one room. It's not like you know the principal calls an assembly. It's people are scattered all over the place so whatever method is in place probably e-mail. Director Communications and Marketing, Corporate Retail Chain Ontario*

*So I feel, face to face with affected employees. I would say phone calls to the affected customers because we're only talking 100 here. And then follow up with registered letters. And then, all company bulletins with the progress as to the situation, so this would be, sorry, internal to employees...the situation and updates as we're going along. Chief of Communications, Lottery, British Columbia*

*We would create an issue note, which is how we then make sure that key stakeholders are aware of the situation. We use issue notes to communicate then with the Ministry of Health, Public Affairs Bureau, as well as our own Board, to just make sure that everybody's on the same page and the issues notes would have fact bound discussion and then advice and recommended response, which is our key messaging around it. Vice President Public Relations, Health Authority A, British Columbia*

*Recognizing that and trying to design an approach that's most customized for those patients you know you would make a very clear and concerted effort to put an expert clinician typically in touch with that particular concern so that they can have good answers to the questions that they may have. Vice President Communications, Hospital F, Ontario*

*Our employees...typically we would use our intranet, and we have a way there...kind of like current news, that we'd actually tell them about the issue, once we figured out what we were going to tell them. Our sales force is probably...they would be the first people to hear this, and they may get it by an email. But more typically, that would be a sort of a series of phone in conference calls. Because they're on the road, so what we more typically do there is, there would a voice mail left for them saying at 1:00 p.m. this afternoon, or 8:00 a.m. tomorrow morning, whatever, at a certain time, call in to this number because your Regional Business Unit Manager will brief you on an upcoming situation, or something like that. So we more often do it on the phone, because they're the ones that usually have more questions, because they're going to get the questions from the physicians. Director of Communications, Pharmaceutical Company A, Ontario*

*For on campus audiences we have a number of channels that we use. We do full on e-mail to all faculty, staff and students. We can do that. We have a student portal that we would post to, our website is very important so we'd post to the main page of the website. We have pop-up capability in our computer labs. So we'd do that. If this affected the residence we would have the residence floor advisors do a walkabout probably. If it were an immediate and drastic situation we would do physical sweeps through the buildings. Vice President Communications, University Alberta*

*It all starts with a detailed look at each stakeholder and the process of communication and making choices about vehicles that you know respects that need to be customized. Sometimes it's one tactic fits all but many other times it's what's the best application for each audience namely, if you're talking with a patient, it may be face-to-face, it may be registered letter, it may be a telephone call by a certain individual or it may be an invitation to a group discussion of some kind or you know it could be let's get the front cover of the paper to tell the story. Chief of Public Affairs, Hospital B, Ontario*

A theme in the interviews was the idea of releasing the information as soon as possible to avoid having another public release it in advance of the organization (see Table 12 below). In the Literature Review Chapter (p. 69), the Arpan and Roskos-Ewoldsen (2005, p. 427) concept of 'stealing thunder' was mentioned as a method of disclosing an organizational weakness before another party can do so. Communicators working through the timing of their disclosure may want to consider how volatile the information is and the likelihood of it becoming 'public' before the organization can communicate to its stakeholders. In an ideal situation, the path of disclosure would follow the pyramid diagram from the previous section but the reality of the situation may be that there is little time to inform people sequentially.

**TABLE 12: Proactive Communication p. 134**

*Tell it all, tell it fast, tell it truthfully.* Director, Public Relations, Health Authority B, British Columbia

*I really don't think there's any benefit to trying to not talk about something because it'll get out there and then it will become something you respond to. So be proactive about it so that you control the situation and you control the information flow and you look as though you're doing your job well in the interest of all your constituents because otherwise you're going to look like you're catching up.* Director Communications, Provincial Government Nova Scotia

*If you get a call before you're absolutely ready to go with the media then I think you become quite aggressive on it and you say: "Yes, we're going to issue a new release. Here's what we've got in the works," and step up your actions in terms of contacting the affected individuals* Vice President Communications, Hospital F, Ontario

*So I would sort of be, if not literally mapping out different scenarios, at least thinking about, "Okay, if this happened, what would we do? If this happened, what would we do? If this happened, what would we do?" And then, "Okay, what can I get prepared?" Is it a statement, a core statement that could be quickly put together if we needed to be proactive and go out?* Vice President Communications, University, Alberta

*If there was a high degree of rumour out there, on campus or off campus, or among alumni, then certainly I would want to get out there very quickly, in a very public way, with a lot of tools that are really, sort of mass communication types of tools. Otherwise, if there hadn't been a declared sort of viral outbreak, I would probably limit it to those people directly surrounding the students who'd been affected* Vice President Public Affairs, University C, Ontario

*My overall process on these types of events is, I try and live by the motto of define or be defined... We've got 22,000 employees, so there isn't really a whole lot that is internal that doesn't get leaked by someone. But if it's something that we know is going to get out there, nine times out of 10, I'd prefer to be on the front side of that and control the message for at least the first kick at it when it's out there in the public as opposed to reacting to it.* Director, Public Relations, Health Authority B, British Columbia

*This is a challenge and I'm sure that we all face is that folks who aren't in the communications industry or aren't communicators within their own portfolios, will often think the first step is let's batten down the hatches and let's not let this get out. I tend to push more the other way. Get out there, get in front of it, control it, explain...it's all those classic things right. Mess up, fess up, dress up and move on.* Chief of Communications, Lottery, British Columbia

*So, instinctively I think there is that kind of ostrich mentality that everyone has. I don't care how many policies and how transparent you're going to be, some of this instinct is, "I'm just going to hope it goes away." So I think instinctively, it's kind of like a, you know, it's that fight or flight thing.* Vice President, Corporate Affairs, Insurance Company, Ontario

To communicate the messages, a theme in the research data was to appoint the most senior person in the organization to provide the public face for the organization (please see Table 22 below). DiFonzo, Bordia, and Rosnow (1994, p. 59) suggested that the rank of the person to address the issue should match the seriousness of the situation. They mentioned that the CEO should be used when it is an important rumour such as lay-offs and earnings but lower level spokespeople in other situations that are less serious (ibid). If the organization is apologizing for something, then the message should come from the most senior person, usually the president and CEO. However, the communicator may want to mull over the possibility of involving others as well depending on the need for content experts.

**TABLE 22: Delivering the Message p. 150**

**Messaging from the Top**

*I think that when it's an issue that is affecting people and affecting the way that they feel about a company and the integrity of a company I always believe that it should be someone fairly senior and if possible the CEO to come clean on these things. I think that the age of the ivory tower CEO is sort of slowly dwindling and you're seeing a lot of CEOs being very humble about things and being honest and open and in some cases it's working and in some cases it's ringing false. Vice President Corporate Affairs, Insurance Company, Ontario*

*Well, we always talk about our processes, and actually we very rarely use me as the spokesperson right. I'm a huge believer in you use the person who's ultimately responsible for either the area or the whole place. So it's very kind of corporate messaging, but when it comes from the CEO, it's very different than when it comes from, quite frankly, the VP of Public Affairs. I truly believe that our role is in the background. I think fortunately or unfortunately, we're seen as spin people, and I don't think that's going to change. I don't think we behave that way, but I think that's the public's perception. Vice President Public Affairs and Communications, Hospital C, Ontario*

*If it was just, say, an overdosing of a small group of patients, my gut feel in this instance would be to use clinicians, the clinical leaders, the CEO, to be able to talk to that small group of patients individually, rather than going and broadcasting it broadly, only because I don't see that that's particularly necessary. You know, this is not a problem, as you've outlined it here it's not a problem that affects a whole community, or a group of people, or whatever. It only affects a small group of patients within the hospital and so I would seek to communicate in a personal way with that small group. Chief Communications, Hospital E, Ontario*

**Closest Relationship to the Audience**

*So I would say that whoever has the best relationship, or the closest relationship to the patients, and whoever they trust the most, may be a personal...well, it's hard to do this I know, but the ideal would be actual personal conversation with their physician, if not their nurse, which is probably more realistic, the person closest to their care. Chief of Communications, Hospital A, Ontario*

*We always recommend that it's the immediate clinician that they've got the relationship with that has the conversation of disclosure. To me, one of the hard parts is we will talk to those clinicians and sort of coach them, and all that sort of stuff. But where things can go real sideways is in that actual conversation, which you can't control. Vice President Communications, Hospital F, Ontario*

**Use of Experts**

*I would imagine that you'd have to get in a health official of some kind, somebody who really knows about that kind of thing to come onto the campus and it so happens that one of our deans is a medical doctor. Vice President Public Affairs, University C, Ontario*

*We definitely need to have someone come onto the campus to speak, a doctor of worth you know. Somebody really, really important to come and speak about it to get people the information before it became a huge deal on the campus. Once again, because I know that SARS is not too far in the minds of, the minds of people. Director of Communications, University A, Ontario*

Deciding on the most effective and efficient tactics and making a recommendation about which members of the organization should be the face of the issue for various audiences will give the communicator and the executive team a good sense of how the messages will be delivered and by whom. A discussion of this portion of the model between the communicator and senior leaders of the organization may reveal further techniques that the practitioner may not have conceived of in the initial run through of the model. In the next section, the tactical ideas and strategy development thus far will be compared to the organization's culture for consistency.

#### **4.4 Culture & Validation**

A public relations practitioner working through this model should be conversant with the organization's approach to communication and how this relates to its culture. The practitioner should know if a plan is either consistent with the organization's experience with disclosure or if it is a departure from the norm (see Tables 28, 29 and 10 included in this section for participant data on culture). If the plan represents a different approach than what the executives may expect, then the communicator should be able to rationalize why this is the case. It could be, for example, that a traditionally closed organization that is not prone to public disclosure is contemplating uncharacteristic openness for a specific issue. The practitioner involved will need to be able to explain the reasoning for a change in direction. The steps in the model thus far may help build a case for disclosure if this is the recommendation of the communicator to the executive team.

If the communicator is unfamiliar with the organization's culture, she may want to review documents such as the mission, vision, values, codes of ethics and talk to people in the company to see if what is being recommended is consistent with practice.



**TABLE 28: Transparency and Consistency in Communication p. 162**

*You know what? If this is who we want to be as an organization, and we want to be accountable to our customers and we want to be customer focused, and we want to do this, and this, and this, then we've got to be open and honest about the reason why we took a position on a certain issue.* Director of Communications and Marketing, Corporate, Retail Chain, Ontario

*Do we...are we committed as an organization...is part of our culture for transparency, and responsiveness and concern and openness, not only in our internal dealings, but with our external...so I think part of that culture and that philosophy is a management responsibility. I would want to be in a company that took things like this seriously, that demonstrated concern, and is interested in transparency.* Director of Communications, Pharmaceutical Company A, Ontario

*So I think the disclosure that we engage in really has to fit the overall communication strategy of the organization. It has to fit the tone of the strategy as well. If we suddenly have a tone when we're disclosing information, particularly around crisis, that doesn't match fundamentally with how we normally communicate...it can be a real problem. I think that we need to make sure that what we're doing and saying when we're disclosing information is what we know as communicators is the right thing to do.* Vice President Public Affairs, University C, Ontario

*I think it's critical. It's ethically critical because, organizations have cultures that are open and transparent and accountable; or, the opposite end of the spectrum. So, the culture will play a big role in terms of setting precedent. What has the organization done with these kinds of problems in the past, how have they dealt with them, generally what is the modus operandi that they've used, what is a typical default position when they run into crises, who plays the lead role, what sort of position does the CEO take, how are the various stakeholder groups communicated with, what vehicles do they use, how is the PR leader used in that particular instance, so those are all examples of how the culture typically defines the corporate approach to dealing with problems like this.* Chief of Communications, Hospital B, Ontario

*This is a really interesting one for us within our organization. We're going through this right now. We're sort of trying to really adopt this notion of a culture of safety and learning, and openness and transparency. I think that one of the biggest things that we run up against is that we can say the words but I'm not sure necessarily the actions of the organizations always follow along with that. There are some people that have been around the system for 20 years, have their entrenched ways of doing things. And while we might as an organization, talk about we have a culture of openness and transparency, and we're going to do what's right for our patients and been seen doing what's right...we don't always do that. And I think that's a struggle that I wrestle with quite often about. It's one thing to talk about doing the right thing. It's another thing to actually be doing the right thing. And sometimes those two don't always mesh up. And that's...I think that's even more dangerous and challenging for our staff, because now not only are you perhaps not being open, transparent, committed to safety, whatever...you also sort of lied about it. Telling people that you are, but you actually aren't.* Director Public Relations, Health Authority B, British Columbia

A communicator may also want to be aware of the formal and informal power structures within the organization and be able to demonstrate there is support for the plan from others close to the situation who may wield influence over a final decision to communicate such as internal experts tied to the event. If for example, the company has a consensus form of power and decision making, as was mentioned in the previous section by Lukes (in Kesting 2005, p. 5) and Galbraith (in Kesting 2005, pp. 17-18), then the practitioner should in this step ensure that the requisite consultations inside the organization with those who can assess and provide support for the disclosure strategy have been included in the development of the plan. It may offer additional comfort to the executive team to know that others in the organization who either represent informal power or possibly expert opinion have been involved and can offer their endorsement of the disclosure strategy. The table below mentions some of the reticence people may have and the more a communicator can present a

solid plan for the disclosure, the more comfortable with the decision the senior team may be. As Hofstede mentioned, methods such as planning and management by objectives are used to reduce levels of uncertainty (1980, p. 117).

**TABLE 29: Open / Closed Culture p. 164**

*If you don't have a really open culture where the organization wants to communicate very openly with the public, and they may feel that there's a lot of risk there, they might be afraid of litigation. There might be...just a...in the past they weren't very open in their communications, then you really have a much more uphill battle to try and convince them to do that, and to convince them that it's the right thing. Director, Lobby Association, Ontario*

*My feeling...our organization right now is that they are fairly open, but as I say when push comes to shove, people get scared. They start to make the wrong decisions. So I think it has a lot to do with, at the end of the day, how you communicate. Director Public Relations, Health Authority, British Columbia*

*If the organization is a laid back, open door, communicative, kind of a culture, where everybody's collaborative and sharing information, then I would think that would make it easier to do some of these things whereas, if the organization is tending more towards bureaucracy and red tape then that could make it difficult. An open door policy university could make things quite challenging. When you need to manage a high end situation like this, sometimes you need to close some of those doors, and filter out some of the interruptions. Vice President, Communications University, Alberta*

*We are currently quite a large university college on the cusp of becoming a full university and we grew from roots of the college so it was very much a 1970 hippy kind of all in the family, granola type of place and that culture is still there. I mean there are undertones of it and what that means to us is that everybody is very connected on a personal level. There's this whole family feeling. There isn't a big break between staff and faculty, like there's not that sort of academic snobbery that I think you find at a lot of bigger institutions and as a result of that there's huge sense of entitlement in terms of information. Chief Communications Officer, University, British Columbia*

*So we have a culture that supports...we don't have the problem of a culture that is secretive or people arguing against wanting to disclose, and in fact, we have a Board that is also frankly biased in favour of proactive communications. So all of that, frankly, just makes our job easier. The communications strategy we would be recommending would be the same regardless of the culture but because we have a supportive culture around it, it makes it a lot easier for us, and it happens pretty smoothly. Vice President Communications and Marketing, Hospital D, Ontario*

*Well, what I think, and now I can compare the hospital environment to my current environment, where my current environment is so...there's so much structure, which is great. Whereas in hospitals, in my experience, not necessarily so much. I think that, and both of those environments for me are very risk averse and very conservative. What I found in a hospital environment and I don't think this was just specific to the hospital but risk aversion tends to lead people to not want to say anything at all or not talk to anybody. Director of Communications, Pharmaceutical Company A, Ontario*

*I think with XXXX, we are very risk averse, but we've got all these regulations that we have to follow, as well as all these global standards, so we've got an actual process, and communications is very valued. And often communications is making major decisions around this stuff, and so there the culture is different. Where they're risk averse, but they know what they need to communicate, and there's a process for that. So that's good. I just think that when the culture is really risk averse and not so sophisticated around communications, you've got a problem. Director of Communications, Pharmaceutical Company A, Ontario*

In addition to ensuring there is internal alignment with the disclosure strategy, the interviewees recommended that people contemplating disclosures talk about their rationale with a colleague or confidant. This person acts as a sounding board for the plan to see if it makes sense. Interviewees mentioned that they routinely become 'too close' to the situation and they begin to lose their objectivity and their desire to protect the organization may obscure their judgment about what publics

need to hear and understand about the event. One participant in the study used a colleague for this role while another used her husband, who has no professional communication experience. The practitioner will have to take care to not break any organizational confidences by speaking to someone about the plan but obtaining an objective, outside opinion could provide insightful commentary on the plan.

**TABLE 10: Get an Objective Opinion p. 128**

*You know if you've not done it before or you're facing something that you know you could use some sober second thought about or whatever it is I think you need to tap into that. I think that's why in our profession the value of the network of similar kinds of professionals can be so valuable. There's always someone who's done it before and there's always someone who has been challenged with similar things and even if that's not the case a different kind of perspective can help guide the process. Vice President, Health Authority A, British Columbia*

*You know there's been lots of times when I've called people external to the organization when something's playing out or even if we're preparing for something and say: "How does this sound to you," or "How might that play if we do it this way or have you seen it done before?" And that's always a very helpful thing the outcome of disclosure is really a win/win in the sense that the ethical accountability of doing the right thing plays out but you know the knee jerk of oh no, we're going to get the terrible headline or the lawsuit or whatever does not play out and that's typical. Vice President Communications, Hospital F, Ontario*

*My litmus test a lot of times is my husband who's not in the communications business. He's your average person who's out there in the marketplace listening to everything coming at him and you know often times I'll bounce things off of him. Director of Communications, NGO, Ontario*

*You know I'm sure there...one of the things that I think is really important to have in this business is mentors and I've certainly had them over the years and I bounce stuff off of them all the time. I've mentored people and I get calls from them all the time asking how would you do this or what do you think about this and some of them who've been in the business for quite some time but just because it is such a tricky situation it never hurts to get a second or third opinion from others to say how you know how would you handle this. You don't have to go into a huge amount of detail or break any confidences but certainly they'll understand the gravity of the situation and I just think you can't go wrong seeking advice from somebody who's you know who's dealt with similar situations. Chief Communications Officer, University, British Columbia*

Alignment with the organizational culture and validating the plan with an outside source are some of the final steps in developing the strategy but before discussing the recommendation with the executive team it will be important to consider how to evaluate the communication efforts. The senior team may want to know how the goals and objectives will be measured and how success will be determined. These items will be discussed in the next section.

## **5.0 EVALUATION**

In this final step, the communicator will have to consider how the success of the plan will be measured before presenting the strategy to management including, how feedback from stakeholders and others will be obtained on the roll-out, and ensure there is an opportunity to debrief on the

strategy with leaders and others throughout the organization and possibly those external to gauge their reactions to the implementation of the plan.

As mentioned in the portion of the model on setting goals and objectives (p. 229), it is important to understand from the outset of the plan how communication efforts will be measured. The executive team may want to understand how results of the disclosure efforts are perceived among stakeholders. To achieve this, practitioners may want to suggest a number of measures to indicate how various groups have been affected with the disclosure. Evaluations of the plan could include media analysis of how the issue was reported, direct feedback from stakeholders in the form of correspondence to the organization or from public meetings if they are held, web-surveys, monitoring chat room and blog activity about the issue, and many other methods.

X. EVALUATION  
Determinants of success  
Feedback on roll-out and course correction if required.  
Debrief on strategy

One of the participants, who was identified in the data as Vice President, Communications and Marketing for Hospital D, mentioned the importance of debriefing with her staff and she said jokingly, *'I'm always saying to team, you know, no patients died on our table today'*. There were other thoughts on evaluation that included conceiving of the worst case scenario that could happen and checking in with your plan throughout implementation, establishing networks internally for anecdotal feedback, examining media coverage (or lack thereof) and checking in with a plan to see if the messaging has saturated the audiences.

**From TABLE 1: Key Informants and Primary Sources p. 114**

*You know you've to be the barometer of this is going to be okay. So I find that actually sitting people down and saying: "Let's just document the information that we know as cleanly and clinically dare I say as possible," and then I think you look at worst case scenarios. Vice President, Communications and Marketing, Hospital D, Ontario*

**From TABLE 2: Work your Network p. 115**

*So every day that I'm making good contacts around my institution with people who may not be, kind of related to the day to day stuff that I do, but I'm keeping good working relationships going. That's like money in the bank. Whenever stuff like this happens, and it does, in places that you and I work right now, you've kind of got those relationships. You know that you can call up that person, they can call you. Director of Communications, University A, Ontario*

**From TABLE 7: Size of Audience = Size of Issue? p. 124**

*In fact, we just disclosed to almost...almost 5,000 people that we had, through a process, compromised their personal health information and you know not one person called the media. Not one person has signaled taking action against us from a legal point of view. Vice President Communications, Hospital F, Ontario*

**From TABLE 26: Frequency of Providing Information 157**

*Yeah. It really...that's a case by case thing. I don't think that I could give a flat answer of it's always, you know, after the seventeenth message, that's too much. Or after...you know. And it...I would probably tend more towards after the third message, it's too much. If we can really, really narrow down what are we trying to say. This university cares about those students. We are doing everything we can to take care of them, and to take care of everybody else on this campus, and we will keep you posted on everything. We'll stay in contact with you to let you know what's going on as our three key messages. And after that, sort of as updates happen, let them know. Vice President Communications University, Alberta*

Feedback from publics is important for the organization to be sensitive to in a disclosure situation to ensure the effectiveness of the strategy and messaging in reaching audiences. Stacks and Watson (2007, p. 74) redefined feedback as symmetrical flow between an organization and its publics. There is an issue of power in relation to symmetry and the organization may choose which publics to listen to and which to ignore but having segmented publics earlier in the model it might be worthwhile for the communicator to recommend the organization pay attention to those who are the focus for the disclosure plan. If the executive team asks the practitioner to assign some level of priority to which publics may have the most influence on changing the direction of a communication plan, a guide might be the disclosure stakeholder pyramid where those near the top of the structure (accountable, trusted/supportive, and directly affected groups) may have more relevant and valuable input into determining the course and possibly success of the disclosure plan.

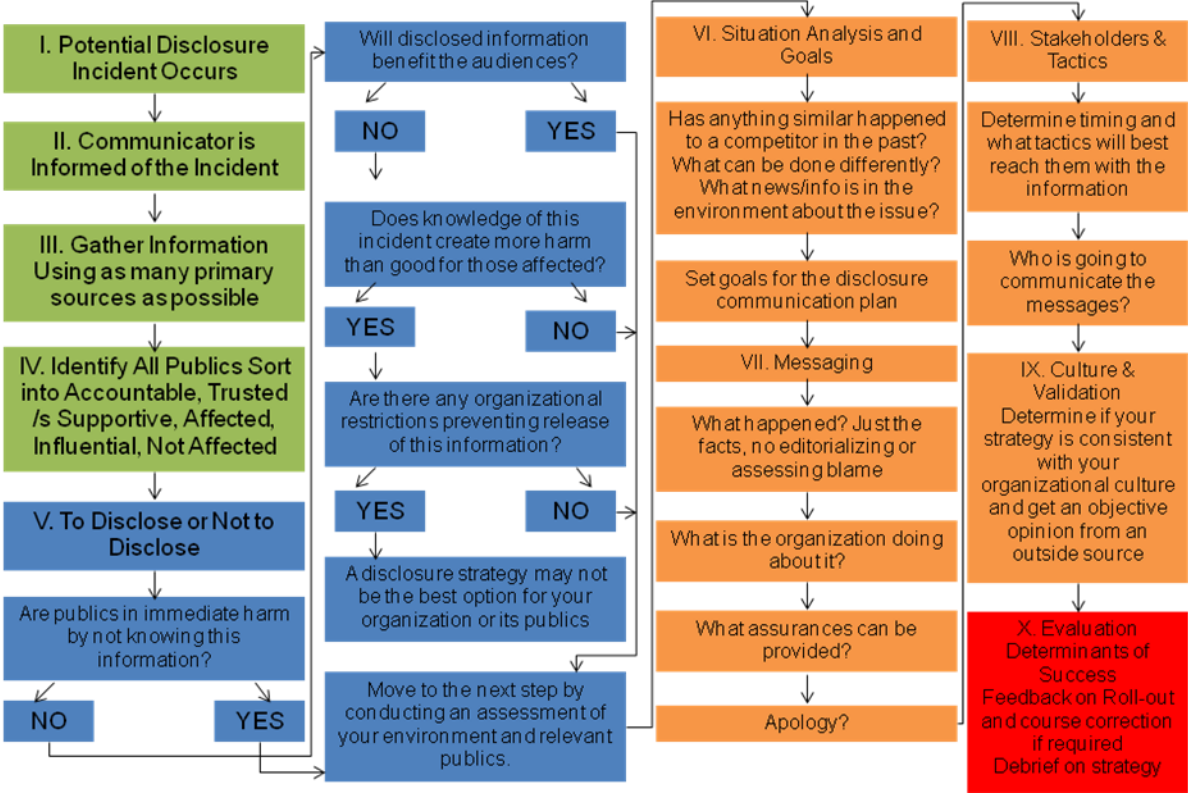
Evaluation is an important component to ensuring the quality of communication as the process is rolling-out from the organization and after the issue has been essentially settled. By gauging 'real-

time' feedback and debriefing on the situation when it is over, the organization will be able to better prepare for future events and ensure its disclosure practices are continually improved.

## **6.0 CONCLUSION**

This section has presented the initial version of a proposed model for disclosure that was based on the feedback from the interviews in this first phase of this research. The model provides steps that are unique to disclosure situations such as the ethical decision tree in the second part of the model. This level of insight is lacking in current models such as RACE, RAISE and ROPE and the disclosure model is an attempt to fill this gap in the literature. In the next chapter, the model will undergo further testing through four focus groups that are comprised of a similar group of practitioners to those who participated in the interviews. The next chapter will demonstrate the similarities and differences of opinion between the interviewees and focus group participants. The focus groups represent an opportunity to further validate the model and employ the 'constant comparison' aspect of the Strauss and Corbin (1998) approach to grounded theory. The schematic below represents the combined sections discussed in this chapter which have been put together in the first version of the model.

# Disclosure Communication Schema – Based on 22 Interviews



## VII. VALIDATION

### Introduction

In this section, results are presented from four focus groups that were arranged to test the model that was developed based on the concepts and categories that emerged from the 22 interviews. Through these groups, a total of 20 people provided comments on the schematic and provided further data on other themes that were raised in the research which pertain to the four research questions. This feedback was quite helpful in validating the steps in the model and in providing further evidence to help answer the four research questions posed at the beginning of this thesis.

In late August 2009, invitations to participate in two focus groups in Toronto and one in Halifax were sent to practitioners in these cities through the International Association of Business Communicators (IABC) database found on the association's website ([www.iabc.com](http://www.iabc.com)). This database was chosen to keep the sample consistent with those who were approached for interviews. The 22 interviewees who participated in the first portion of this research were also drawn from the IABC database. In total, 80 invitations were sent from me, via e-mail, for the Toronto groups and 40 were sent for the Halifax group. A fourth group was attempted in Halifax but unfortunately, only one person showed. It seemed inconsistent to use the feedback of one person in this second portion of the research, given that the data collection was based on the dynamic of a focus group. The invites resulted in 14 participants in the first three groups (11 in Toronto and three in Halifax). A final, fourth group was arranged for Toronto in November 2009, which attracted six participants.

Similar to the selection criteria for the interviews, people were chosen for the first three groups from the IABC data base who had a job title of 'manager', 'director', or 'vice-president' (however, one participant in the Halifax group had the title of 'advisor'). As with the interviews, senior practitioners were chosen due to the likelihood that they may have had experience in helping their organizations make decisions about disclosure situations. There was representation from three levels of government (municipal, provincial and federal), not-for-profit charities, finance, and those who



provide communication consultant advice through an agency to clients in a variety of sectors from pharmaceuticals to packaged goods. For the fourth group, I contacted a well-known agency in Toronto called Strategy Corp, to see if they would be interested in providing input on the model. Six people from their team, who deal largely with crisis, issues management and disclosures, participated in this group (see Appendix D for biographies of the attendees).

Before the beginning of the discussion of the first three groups, the participants were told the session would be recorded but their actual personal identities or those of their organizations would not be provided. I believe this helped to ease any concern that may have been held by the participants about discussing what could be sensitive information about how their organizations manage disclosures. The issue of confidentiality arose early in the recruitment process. One prospective participant, who works for Visa, a global credit card company, replied to my invite by inquiring about the level of confidentiality to be used in the final write-up of the sessions:

“Will comments stemming from the focus group be credited to the speaker or is the discussion anonymous?”

I tried to reassure her that neither she nor her organization would be named but she declined to participate. Another person who participated in the second Toronto focus group, who is the director of communications for a large municipality, made this comment regarding confidentiality:

“...you’re not using people’s names here so I’ll just speak my mind...”

I think for this participant, the level of confidentiality gave him some sense of security to speak openly about the subject. The fourth group was not offered confidentiality and they did not request it. Each participant was also asked to complete a brief questionnaire (see Appendix D) to determine some basic background information on length of experience, current title, education, and sector of employment. Every participant completed the questionnaire which was collected and collated at the end of the session. Results are presented at the beginning of each section below.

I acted as the focus group moderator in all of the sessions. An agenda or discussion outline was followed to ensure feedback was obtained on various sections of the model. Even though a discussion guide was used it was not followed too strictly. The conversation was allowed to meander to allow participants to make their points without feeling as though they were being 'cut-off'. Acting as the moderator had both pros and cons for me. On the positive side, my knowledge of the model helped to provide context for how the model was developed. It may have been difficult for a third party moderator to explain the model to help the conversation move along. Acting as the moderator raises concerns of personal bias however with respect to how the discussion groups were led and in how the groups reacted to me as the person who developed this tool.

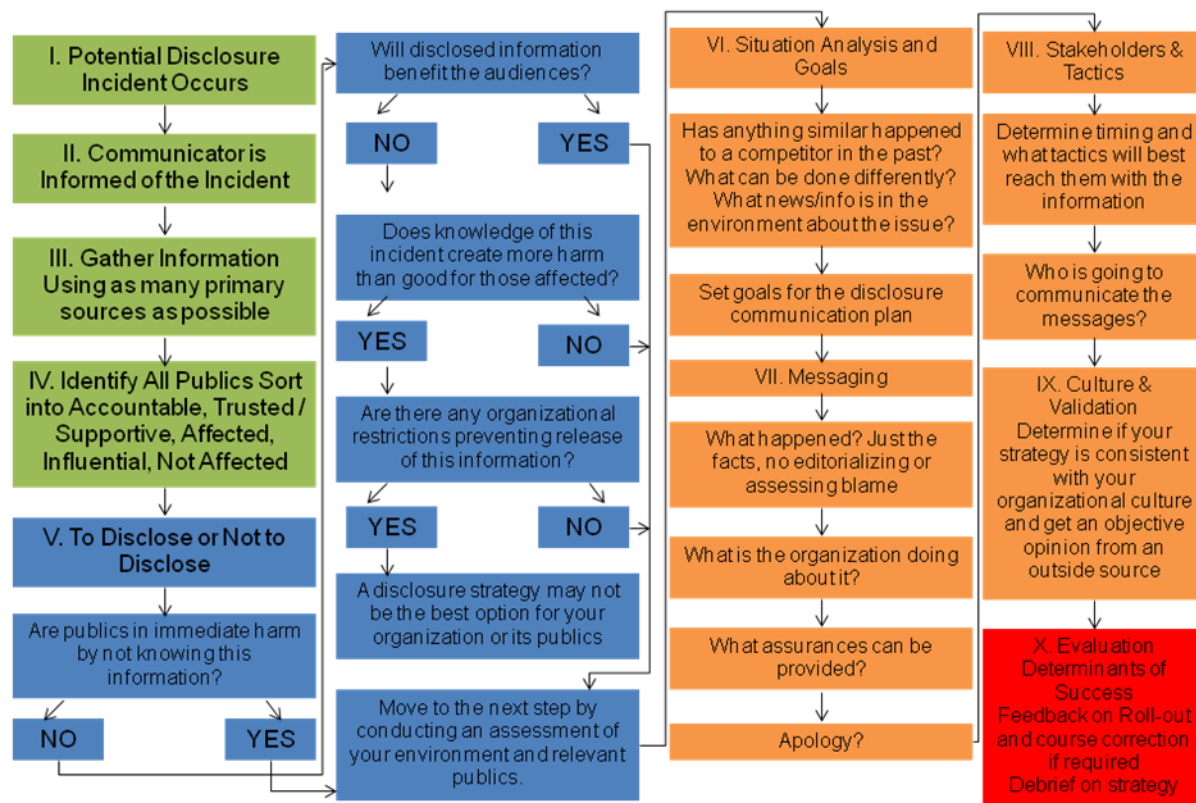
In an attempt to overcome any hesitation among the participants about criticizing the model, I mentioned at the beginning of each focus group how it was developed and that everything that appeared in the schematic was up for discussion in terms of editing text, moving boxes around, deleting them altogether or adding in new pieces. I said the model will only be strengthened through further input so the participants would be helping me by being critical of the diagram. It is difficult to say with any degree of certainty that the input the focus group participants offered was free of any reluctance to provide criticism but given the level of experience and work history of those who were there, it is unlikely, in my view, that they would have been hesitant to offer their honest opinion.

Focus group participants suggested changes to the model which will be shown below in an iterative manner based on the feedback from each of the first three groups. The first three groups were shown the model based on the interview feedback and the final group was shown the model based on the amalgamated feedback of the first three groups. The first part of this chapter deals specifically with suggested changes to the model as each group discussed them. In the second part of this chapter, themes other than those specific to changes to the model but relevant to the research questions, are presented.

## 1.0 FOCUS GROUP FEEDBACK ON THE MODEL

In this first section, the feedback the four focus groups provided on the model is presented sequentially. A diagram of the model is provided below as it appeared following the initial 22 interviews. This section of the chapter demonstrates how the schematic changed with input from each group.

### Disclosure Communication Schema – Based on 22 Interviews



## 2.0 FOCUS GROUP A – TORONTO, SEPTEMBER 16, 2009

### 2.1 Introduction

My first focus group took place in the offices of NorthStar Research in downtown Toronto from 6:30 – 8 p.m. The location was chosen out of convenience for the participants. Most of them work in the downtown core of the city and this location was close to the subway. The room itself was a medium sized corporate boardroom with comfortable space for about 15 people to sit around a rectangular

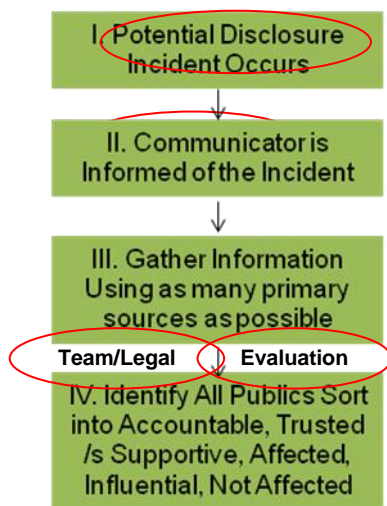
table. A light dinner was provided and the participants ate while I gave some introductory comments about me, the purpose of the focus groups and how they would be identified in the thesis. I also reviewed the agenda and explained we would be reviewing the model.

Five people showed up for this group even though seven had confirmed their attendance earlier in the day. No response was received from the two who did not show. As the table below shows, there was a good mix of communication practitioners from the corporate and consulting field as well as government and the not-for-profit sector.

**Participant List Table**

Participant	Job Title	Years of PR Experience	Highest Level of Education	Highest Level of PR Education	Sector of Employment
One (M)	Director	11-20 yrs	Bachelor's Degree	Bachelor's Degree	Corporate Consulting
Two (F)	Manager	6-10 yrs	Bachelor's Degree	Certificate	Finance
Three (F)	Manager	11-20 yrs	Bachelor's Degree	Bachelor's Degree	Not-for-Profit
Four (F)	Vice President	11-20 yrs	Bachelor's Degree	Bachelor's Degree	Corporate Consulting
Five (M)	Director	20+ yrs	Bachelor's Degree	Bachelor's Degree	Federal Government

**2.2 Focus Group 'A' Feedback on Gathering Information: Part I of the Model**



In the figure included here, the first section of the model is shown as it appeared based on the initial phase of the research (22 interviews).

There are red ovals placed on the diagram to highlight where the respondents from this group had specific changes. A modified version of this section will be presented at the end of this section.

In this first section of the model, an incident occurs and the communicator is informed about it and begins her collection of the facts to find out what happened and who is involved. One participant

mentioned that she would be informed of an incident or an issue from operators in the call centre of

her company. This makes sense given the service nature of her business. She works in finance and her organization is an electronic hub for millions of financial transactions that occur each day.

**Table 39 Gathering Information Focus Group A (253)**

*We'd often get called by the head of a customer service group who'd start getting calls from a Call Centre about an issue that was brewing and let us know that there was something happening – Manager of Communications, Financial Services Company*

Another participant, who is the Director of Communications for a federal government department suggested changing the first block to avoid assuming that something necessarily needs to be disclosed. This change may broaden the scope of scanning the environment for issues, instead of limiting the scope of the model to those issues that may need to be disclosed. It is possible that some incidents may begin without ever being considered to be a 'potential disclosure'. His point in making this change was to avoid making any assumptions too early in the process about an incident and rather than being selective about running only those 'potential disclosure' incidents through the model, run all issues through the model to see if they merit a disclosure.

**Table 40 Gathering Information Focus Group A (253)**

*I'd start with the first block okay. I would take out "potential disclosure" from that box because I think you're almost sort of jumping the gun there. I would just say "incident occurs" – Director of Communications, Federal Government Department*

In the box titled 'II. Communicator is Informed of the Incident', a suggestion was made to substitute the word 'Communicator' for 'Management' to ensure there is accountability among managers to inform communicators of the incident and to ensure there is an expectation that front-line staff communicate with their managers about issues and that these are relayed to the communicator. Another participant, who is the director of communications for a Corporate Consulting Firm, supported his comments and mentioned that as he read it, he assumed that management had been informed and that they were relaying this information to the communicator. He mentioned that to clarify this box, it might be helpful to include the word 'management'.

**Table 41 Gathering Information Focus Group A (254)**

*The next box I think – I would say – I would substitute “management” as an informer of the incident because I think it’s very important to put the responsibility on management. We as communicators can advise but I think it’s ultimately the responsibility of management and management has to take the responsibility. You have to encourage a culture where frontline workers have a duty to inform their supervisors and up through the organization about incidents. So I think it’s important to put the responsibility on management. Director of Communications, Federal Government Department*

*To that point, that was an assumption I made when going through the schema of that – that determination of whether it was an incident. It somehow hit someone in management and then immediately made the decision to involve communications but it might be good to write it in. Director of Communications, Corporate Consulting*

A simple substitute of the word ‘management’ however, may be contrary to earlier data that emerged from the interviews that suggested communicators discover issues from a variety of sources and not just those that are internal and come through the management structure (Chapter IV, p. 114). There were points made in the interviews that potential issues are sometimes discovered internally and externally through networks of contacts (Table 2 p. 116). To ensure the model is not limited to communicators having to be informed from management about a potential issue a possible compromise with the suggestion of this participant and earlier data might be to include both terms in the box to read ‘Management / Communicator is informed of the incident.’

There were no issues expressed in this group with the next box ‘III Gather Information Using as many primary sources as possible’, however there were suggestions that came forward to add boxes in between steps III and IV. Before moving on to step ‘IV Identify All Publics’, it was suggested that the communicator should gather the appropriate team needed to work through the issue and gain a legal opinion on the situation, if necessary before getting too far into communication planning.

**Table 42 Legal Issues - Gathering Information Focus Group A (255)**

*I think the next thing is you get all the information then you have to decide what legal issues are there? You have to sort of consult the legal department; I guess there are duties to do something or the regulatory agencies would have to be informed.* Director of Communications, Federal Government Department

*At some point fairly early in the process, sorting out who your different stakeholders are will help all the conversations so you know everyone is on the same page; like one person isn't talking about senior board management and the other person is...to at least having...yeah, figuring out anything legal early on makes sense but talking about those audiences and identifying those fairly high up is useful.* Manager of Communications, National Charity

*We've gone far down the path in the past and figuring out what we're going to say, how we're going to say it, only to find out well, we can't talk about this because of such and such a reason so getting that legal or depending on the type of environment you're in, advice first sometimes sets the stage for what you do next.* Manager of Communications, Financial Services Company

*So gather information I think for the purpose of the diagram, you want to keep it relatively small but I was imagining that involving sort of all that work. Maybe I would assume...maybe what I would consider somewhere in there is assemble the team.* Director of Communications, Corporate Consulting Firm

A suggestion was also made to determine the scope of the issue to understand the magnitude of its impact on the organization and audiences (Table 43). In this step, the Communications Director mentioned that conducting a bit of analysis at this stage can help determine the communication strategy with respect to how to disclose the issue and to whom. The last part of his quote points to a strategic decision that may be made about the communication of the incident and whether or not something is provided to the affected audiences on an individual basis or if it is a matter than needs broader communication.

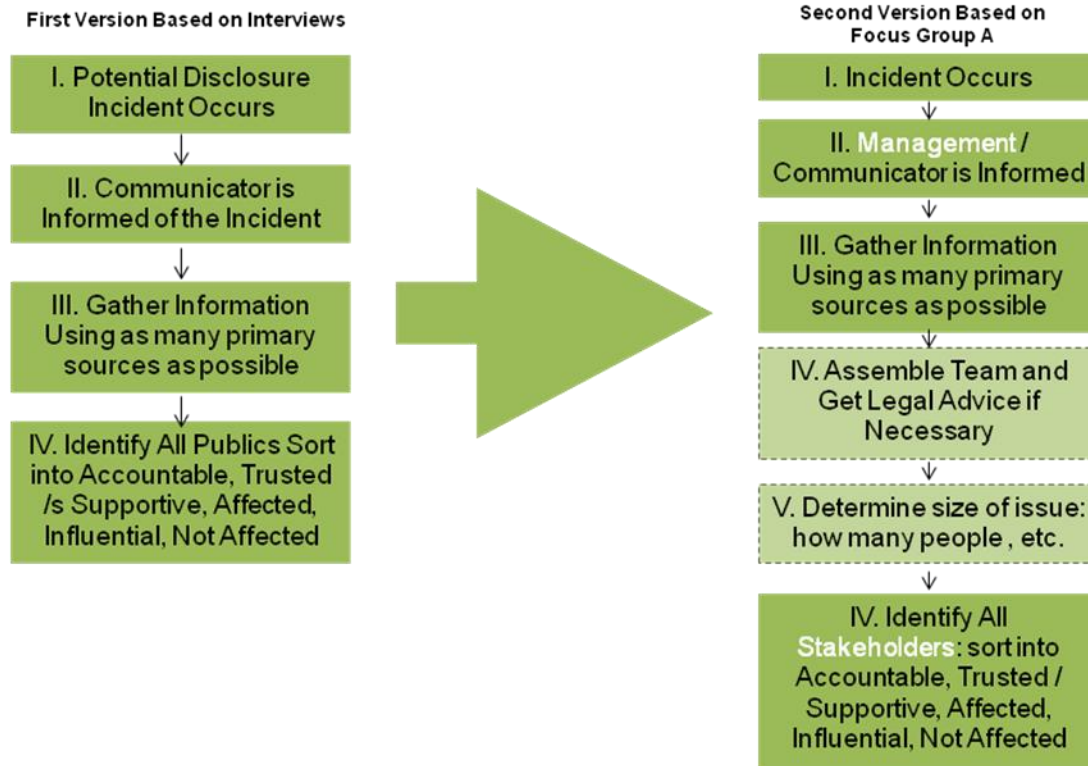
**Table 43 Scope of Issue / Gathering Information Focus Group A (255)**

*I tried running real life scenarios in our organization through the schema and one of the things that kind of pertains to the discussion we just had was...early on like between step three and step four we do a measurement of the scope of the issue. How many people are impacted and is it something we can communicate on an individual basis in a timely manner without publicly disclosing something.* Director of Communications, Corporate Consulting Firm

A final suggestion was made to change the word 'publics' in box IV to 'stakeholder' to ensure there is no confusion between this step and the 'Stakeholder Disclosure Pyramid'. There were no other comments from this group specific to the 'Stakeholder Disclosure Pyramid' and how someone may choose to prioritize stakeholders.

In the diagram below, the changes to Part I of the model based on feedback from Focus Group A are presented in the diagram on the right. With the exception of the omission of the words 'Potential Disclosure' from the first box, the remaining changes are highlighted in reversed white text and the

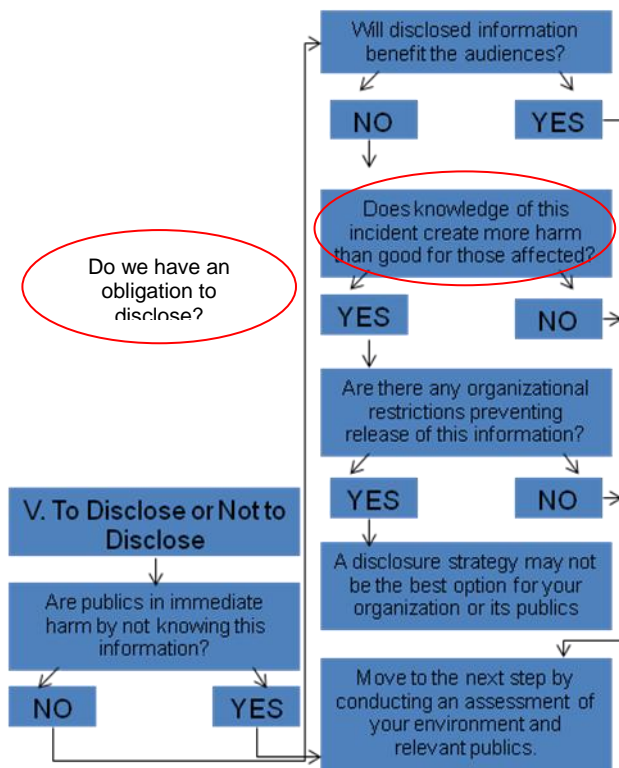
two additional boxes that were suggested in the feedback are shown in a lighter shade of green with a dashed line surrounding them.





### 2.3 Focus Group ‘A’ Feedback on Disclosure Decision Making: Part II of the Model

Participants in this group commented on the first three questions of this part of the model and brought forward some minor suggestions for improvement.



There were a couple of comments about use of the word ‘harm’ in the first question of the decision tree. In the exchange among the participants shown in Table 44 below, two of them suggested an alternative to the word ‘harm’ in the first question. The Director from the Corporate Consulting Firm, mentioned that it is actually a good ‘tone-setting’ question that will help shape the discussion among the team that has assembled to manage the issue. Similar to the interviewees in the first phase of this research, (Table 9, p. 126) the Director

quoted below mentioned the use of a ‘gut feel’ that may guide him in his decision making. His point is that if he believes his intuitive sense of leaning toward a disclosure may be contrary to those who are on the decision making team with him, the first question about immediate harm or ‘risk’ sets a serious tone for the conversation that brings the issue to the forefront of the organization’s deliberations.

Table 44 ‘Risk’ Ethical Decision Making Focus Group A (257)
VP: <i>Not really the “harm”. It’s like something about the effect on them but it doesn’t necessarily have to be harmful.</i> Director Consulting Firm: <i>At risk. At risk.</i>
VP: <i>Yeah, is it at risk. Yeah, that’s a better way of saying it.</i>
<i>A great way especially if your gut feel is to disclose and the majority of the rest of the group are personality types that are unlikely to want to disclose anything. That’s a good question to ask as an initial question, especially if you’re gathering as a team. It sets the right tone for future conversations about if this ever does get out...</i> Director of Communications, Corporate Consulting Firm

In the discussion of the second question in the model, 'Will disclosed information benefit the audiences?', there were no specific changes suggested to the wording but a couple of participants commented that it was a difficult question to answer. As reflected in Table 45 below, the Director seemed to agree with including the second question and if the answer was 'no' then it may not make sense to provide the information, especially if it harms the organization. This reasoning is consistent with a utilitarian approach that was mentioned previously (Chapter V, p. 189), where ethical decisions may be made based on what L'Etang (2006, pp. 405-406) described as the 'greatest happiness principle' which involves pleasing the greatest number of people. If in the quote below, the greatest number of people to benefit from a non-disclosure is the employees of an organization, assuming there is no benefit to informing audiences then it may be reasonable to choose not to disclose a situation.

**Table 45 Ethical Decision Making Focus Group A (258)**

*That's maybe a tough decision to make. Maybe ethically you would like to share the information but at the end of the day if there's going to be no benefit to the individuals affected in sharing information but great harm to your organization and the employees and all of your families that you're responsible to, then it's a tough decision you have to make and maybe not share the information.* Director of Communications, Corporate Consulting Firm

Another participant, the Director from the Federal Government, had difficulty with use of the word 'harm' in the third question, which he found somewhat 'paternalistic' and suggested that the term be defined in more detail to help users of the model. He asked what criteria would be used to assess harm but did not suggest anything specific. The study did not explore developing criteria for the word 'harm' and how it would apply to the model and it was not suggested previously. It may be that the word harm is relevant to the organization's interpretation of the word and how it applies to their norms and practices.

**Table 46 Ethical Decision Making Focus Group A (258)**

*I guess I have some trouble with one of the questions. Does knowledge of this information create more harm than good for those affected? That sounds like quite a paternalistic question... I mean you have to define harm and how do you judge that? What criteria do you use and what mechanism do you use to answer that question? I think it's very difficult to answer.* Director, Communications, Federal Government Department

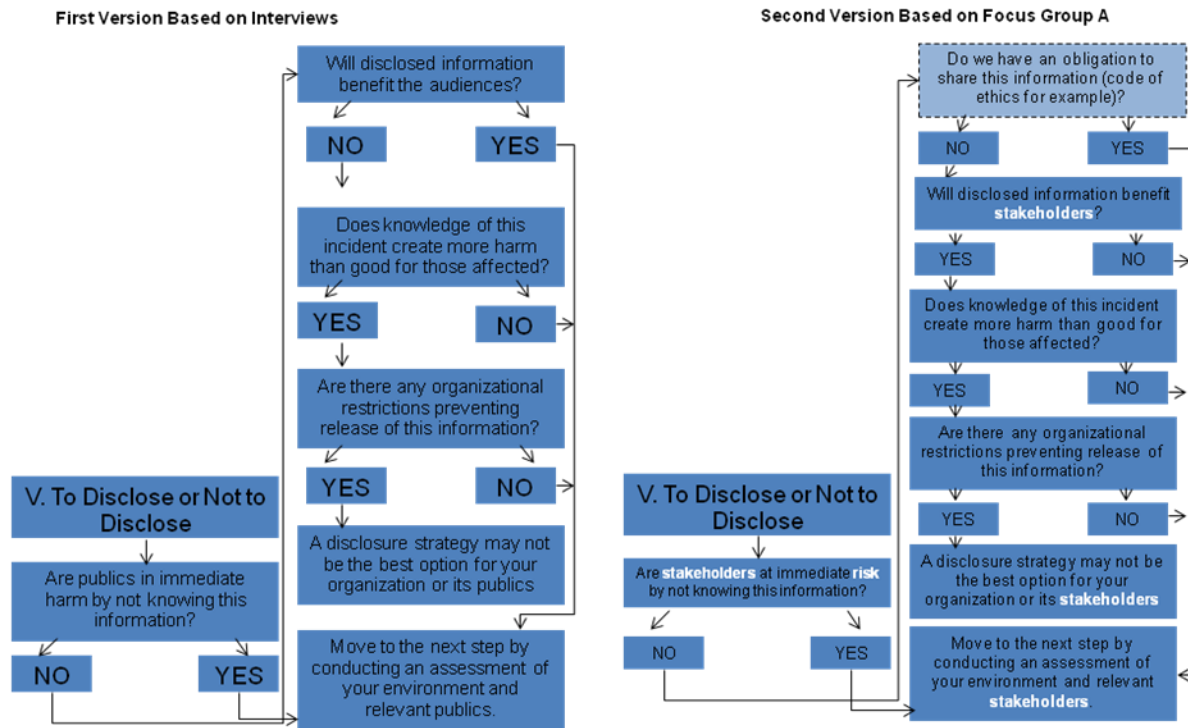
In a follow-up question, the same participant above, who had difficulty with use of the word 'harm' offered another question that could be used to help clarify the situation and make the discussion of harm or risk less arbitrary. He suggested that companies should refer to their 'codes of social

responsibility', or ethics to guide them in their decision-making. This theme also surfaced in the interviews (Table 11, p. 129) but was not included specifically in the earlier version of the model.

<p><b>Table 47 Ethical Decision Making Focus Group A (259)</b></p> <p><i>I would also ask the question – I would say does the organization have a responsibility to disclose this information according to our corporate code of social responsibility? Director, Communications, Federal Government Department</i></p>
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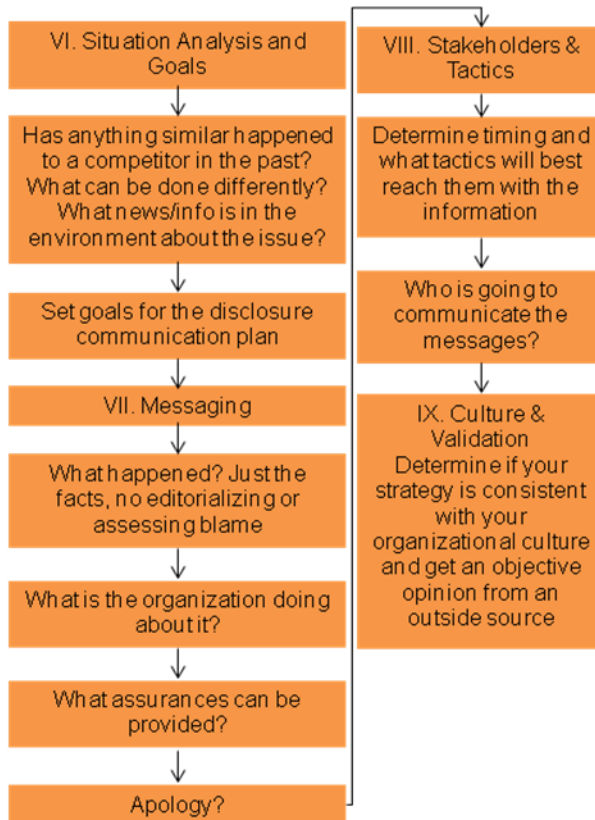
It may be that an organization has a robust code of ethics or social responsibility or possibly a policy that articulates what they will and will not disclose. Having these policies written down and understood among the organization's leadership may provide a guideline for disclosure situations.

In the diagram below, the suggested changes from Focus Group A are represented in the image on the right. The word 'risk' was added to the first question box (highlighted in white font) and although it was not mentioned in this section, to keep the recommendation from the previous section consistent regarding use of the word 'stakeholder' in place of publics or audiences, this change has been made below (highlighted in white font). The additional box that addressed the suggestion of whether or not the organization has an obligation to share the information, through a code of ethics or code of social responsibility is included at the top of the second column in a lighter blue box.



## 2.4 Focus Group 'A' Feedback on Communication Planning: Part III of the Model

As evidenced in the text box below, there was some discussion about the questions in the first box underneath the Situation Analysis and Goals. One of the participants, the Director of



Communications for the Federal Government Department, seemed to be confused about why an organization would concern itself with what a competitor has done when presented with a similar situation in the past. He seemed to interpret this as a component of message development instead of research and suggested it would be unlikely that you would be able to say anything about a competitor in your messaging. I mention his comment here because it was an important point for me as a researcher. He was misinterpreting the intention of this section of the model and it would have been easy for me to simply correct

him and move on but it was more important for me to see if his confusion was shared among the other participants. I resisted the urge to interject with my thoughts and waited to see what the others said about this section of the model. If there was no confusion among the other members, the piece would stay but if there was an issue with how this portion was perceived by the others, it would have been a good signal to me to make a change and probe further to understand why there was an opportunity to misread this section. Fortunately, this point of the conversation transpired constructively and the other participants seemed to make sense of the intention of this section of the model, as evidenced in the exchange below.

**Table 50 Strategy Focus Group A (261)**

Director, Communications Federal Gov't: *Has anything similar happened to a competitor in the past? I don't know what the relevance of that is because you can't really talk about any competitors anyway. You look kind of weak if you say well, things happen with other companies, it isn't just us.*

Manager, Financial Services: *But isn't it similar to law where you go and research the closest situation to you?*

Manager, National Charity: *Yeah, like if you've got an oil spill at your company, you're going to look at how other companies have handled that publicly when they've had a spill – what works, what didn't work.*

Manager Financial Services: *Yeah, it doesn't necessarily have to inform – you're not necessarily going to – when you go out to your stakeholders, you may not stage every single one of them – well, Ford this or Bank of Montreal did that but I think it's still a useful question to ask when you're gathering all your information... it's a question most executives have asked me – what's happened when our competitor did this? How did they handle it? What did they do? They just want to know.*

Under the box labeled 'messaging' there are four subsections that lead to the development of what the organization's spokespeople will say in response to the issue. There was a brief exchange among participants when asked, 'When should an organization apologize?' There were no suggested changes to the model as a result of this part of the conversation but the advice they provided about when an apology should be issued is consistent with the feedback the interviewees provided in the first phase of research (Table 18, p. 145).

**Table 51 Apology: Strategy Focus Group A (261)**

VP Communications Corporate Consulting (VP): *When they put the stakeholders at risk.*

Director, Federal Gov't (DFG): *I guess when an organization hasn't lived up to its own stated commitments. I think the worst thing is you see these apologies and then they kind of "but you know you have to understand" blah blah blah...then they sort of "well, we didn't really mean to" and they sort of...*

VP: *Like Maple Leaf Foods.*

DFG: *Yeah, I think it's got to be a straight, clean apology. There's nothing worse than kind of hedging and blaming everybody else. That appears very weak.*

Manager Corporate Consulting (MCC) *Here's where I think the organization has a tendency to be quite liberal in this regard which is great. Legal always influences the apology and I think certainly the legal community has evolved I think in terms of their perceived notion that...*

Manager Financial Services: *The liability.*

MCC: *The liability around an apology and I think there's less of a notion of you being...you're not necessarily liable if you make an apology and so they're much less inclined to argue against the apology. In many instances we would apologize to a certain extent to your point where we have a commitment but also where we feel...you know if you're the type of an organization where you want to convey the message that the buck stops with you, you perceive yourself to as being accountable.*

There was a small change suggested and a brief comment made about who the spokesperson should be when delivering the disclosure information. One person commented that it depends on the magnitude of the situation which is consistent with the data from the interviews (table 22, p. 150) and

the concept that DiFonzo, Bordia, and Rosnow (1994, p. 59) suggested that the rank of the person to address the situation should match the seriousness of the situation.

**Table 52 Spokesperson: Strategy Focus Group A (262)**

*If it was bad news, it was always the media spokespeople. If it was good news it was the executives [Laughs]. That's one approach to take. I think it depends on the magnitude of the issue. Certainly if it's something extremely serious I think you want your CEO or you want your senior leader to be out there representing the organization. Manager, Communications, Financial Services*

*It's kind of minor, it's more of a word kind of issue but I'm wondering if wording more along the lines of who is most appropriate to communicate the messages will just be more in line with this as a value added tool. Manager, Communications, National Charity*

I was surprised with comments on the 'IX Culture & Validation' section of the model from two of the participants in this group (Table 53). Although they were not necessarily saying organizational culture is unimportant when considering disclosures, which would be inconsistent with data obtained from the interviews collected in this study (Table 29, p. 164), they did not believe that questions about organizational culture belonged in the model. One of the focus group participants described the model as a 'diagnostic tool' and he said that the questions about culture do not fit. This seems odd given that the culture of an organization may be a 'diagnostic question' when determining a disclosure strategy. Based on their quotes below, the respondents seem to view culture as an overriding concept that does not need to be questioned but is present regardless of whether or not someone asks about it. The second respondent did not believe that the entire box should be eliminated and he found the 'validation' part of it helpful, which is consistent with data from the interviews (Table 10, p. 128).

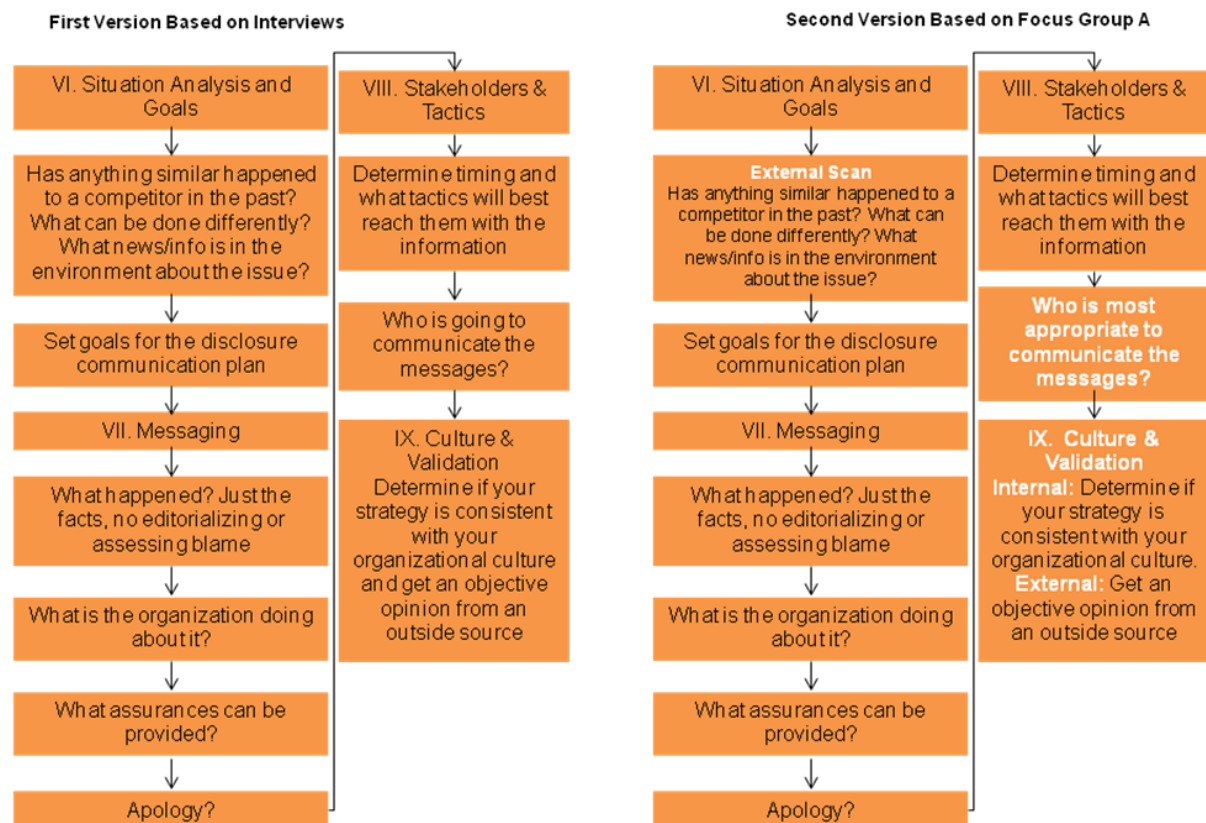
**Table 53 Strategy Focus Group A (262)**

*It seems to me kind of strange to bring culture at the very end of this thing because if this is a diagnostic tool, then it should be leading to assess the pros and cons, the legal aspects but then sort of at the end of it say well, does this fit with our culture? It seems kind of strange to me because that sort of suggests that culture sort of overrides everything else. I think I would just take that box out. Director, Communications, Federal Government Department*

*If you set some goals up front for what you would want to achieve in any disclosure situation, your goals would be informed by your culture. That's how I saw it. I've actually been in situations where the culture question is asked going through this type of scenario and I've never found it helpful. Although it's very cold and factual just to go through these questions first, I think it still fits the validations. That's just my personal view that culture could inform the overall objective of almost any communication plan be it a disclosure or any other. Director, Communications, Corporate Consulting*

Since questions of culture seem to be an internal validity check for the communication plan and the second part of this box includes the suggestion of gaining an external opinion about the strategy, it may make sense to alter the section to include internal and external validation against the

organization's culture and with an external person. No one in the other focus groups took issue with the word 'culture' in the diagram therefore the clarification of internal and external will be made but the word culture stays. Below are the summary changes to this section of the model. The suggested wording changes are highlighted in white font in the figure on the right.



## 2.5 Feedback from Focus Group 'A' on Evaluation: Part IV of the Model

When asked about evaluating communication and disclosure plans not much feedback was provided but some advice was shared such as media monitoring and analysis, gauging reaction among customers, and the importance of speaking to internal constituencies such as staff to determine their perceptions of the situation (see quotes below). These suggestions were similar to those mentioned in the first phase the research (see page 245) but in the initial version of the model, they were covered more generally under the headings 'feedback on roll-out' and 'debrief on strategy' that appear in the Evaluation box. Since the changes this group suggested were not stated explicitly in

the previous version of the model the suggestions have been reflected in the subtle additions made to the diagram below (changes appear in white font). It should be noted however that 'media monitoring' for example may only be an indicator and will not tell the organization what publics are actually thinking about an issue. It can only tell you what the press is reporting about the issue.

<p><b>Table 54 Spokesperson: Evaluation Focus Group A (264)</b></p> <p><i>I think some of the traditional ways – how many of your messages got out into the media that you were attempting to get out; that balance of the negative coverage versus positive? I mean there are some things – you know what's happened is negative clearly but when you were responding, were you able to control the message and to what extent. Manager, Communications, Financial Services</i></p> <p><i>Certainly when we looked at it in terms of how many customers we lost when certain announcements were made, how many went to the competitors as a result of not being happy about a decision or an issue or something that came up so that's another way to evaluate. Manager Communications, Financial Services</i></p> <p><i>One thing we did in evaluations is we brought together small groups of employees and asked them questions because during a situation where the organization is in the media constantly over an issue, I think it's important to touch base with your employees and find out how they're thinking about it and what they say. Director Communications, Federal Government</i></p>
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**First Version Based on Interviews**

X. Evaluation  
 Determinants of  
 Success  
 Feedback on Roll-out  
 and course correction  
 if required  
 Debrief on strategy

**Second Version Based on Focus Group A**

X. Evaluation  
 Feedback on Roll-out and  
 course correction if  
 required  
 Debrief on strategy  
**Media Monitoring**  
**Focus Groups with Staff**

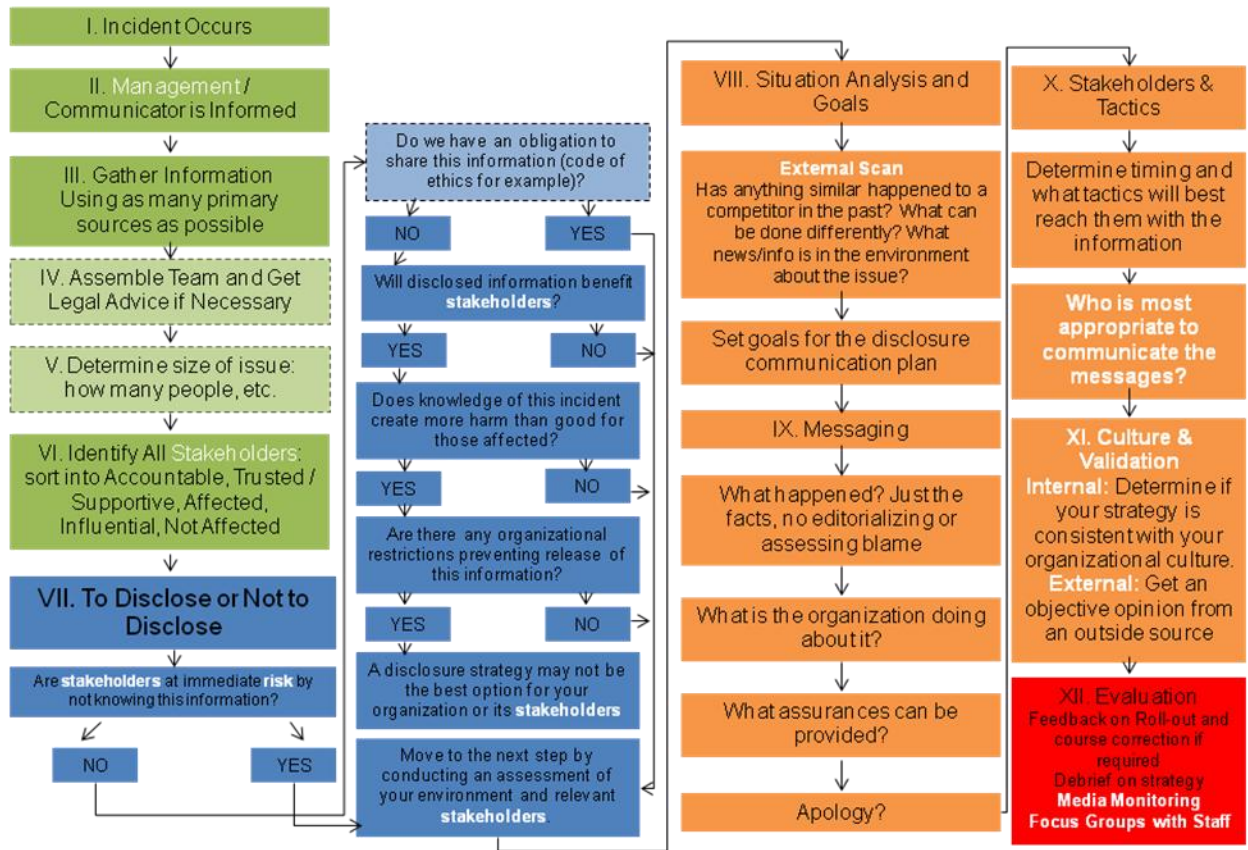
**2.6 Revised Model Based on Feedback from Focus Group 'A'**

Included below is the revised model based on the comments provided by Focus Group A. The changes are highlighted in white text and in lightly shaded boxes with dashed lines around them.

Although not substantial, the changes may improve its clarity and the additional boxes may make the decision-making, strategy building and evaluation sections more robust.



## Disclosure Communication Schema – Based on Focus Group #1



### 3.0 FOCUS GROUP B – TORONTO, SEPTEMBER 17, 2009

#### 3.1 Introduction

In the second group there were six participants, although eight were confirmed, unfortunately two had to cancel at the last minute. The focus group was held in the same location and time but on a different day than the first group. An identical agenda was provided and even though there were some similarities in the themes that arose between this group and the first session, the discussion in this group was not as concerned about specific changes in wording that the first group mentioned. This was both a positive and a negative for me as the moderator. On the plus side, the discussions in this second group were a little less concerned about wording changes but on the minus side, it was somewhat difficult to get specific suggestions from them and the conversation jumped around from topic-to-topic quite quickly, which was not as easy to follow as the first group. The second group also had a good mix of corporate, government and non-profit. The discussion lasted 95 minutes.

**Participant List Table**

Participant	Job Title	Years of PR Experience	Highest Level of Education	Highest Level of PR Education	Sector of Employment
One (M)	Director	11-20 yrs	Certificate	Certificate	Mass Transit (Government)
Two (F)	Vice President	11-20 yrs	Bachelor's Degree	Certificate	Public Relations Agency (1)
Three (M)	Director	20+ yrs	Bachelor's Degree	Nil	Municipal Government
Four (F)	Director	11-20 yrs	Bachelor's Degree	Certificate	Provincial Government
Five (F)	Vice President	20+ yrs	Bachelor's Degree	Certificate	Public Relations Agency (2)
Six (F)	Vice President	20+ yrs	Bachelor's Degree	Bachelor's Degree	Non-Profit

### 3.2 Feedback From Focus Group B: Gathering Information Part I of the Model

There were no specific changes offered from the participants on the first section of the model. There was some commentary provided though that was consistent with the first group around obtaining a legal opinion fairly early when presented with a disclosure issue. As evidenced in the quotes below (Table 55), the discussion centered on constraints the participants encountered, such as privacy legislation, when attempting to comment on an issue publicly. This is similar to the feedback received from interviewees in the first part of the research who lamented some of the constraints they experienced when attempting to disclose information (Table 23, p. 153).

**Table 55 Gathering Information Focus Group B (267)**

*So is there FOI or freedom of information kinds of applications or rules that apply? That would be really helpful for people to think of and I think the other thing...the second thing is that we always, when it comes to a contentious issue, we will stop the presses and check with our legal folks when it relates to an HR matter or contractual issue or some other kind of thing where there's possible consequences in the course of my...so we try and cover off the legal aspects. Director, Communications, Municipality*

*Absolutely, much like Kevin my world is primarily crisis communications so I'm...one of the crisis' that we struggle with the most I think are the HR, the personnel matters right? Somebody works for the organization, does something really stupid. Now we work in a unionized environment and so sometimes it's in our interests publicly to talk about the issue because we want to be seen to be doing the right thing. Sometimes we can't because now suddenly it's a personnel matter. It's grey; it's not black and it's not...it's not a driver who is driving drunk, it's something else that's much more difficult to nail down but still serious so how do you deal with that?*

*I think...I'll be quiet after this, why I think I'm having so much trouble with the whole HR matter is we may get a call...so somebody goes to the media, a third party or the public goes to the media with some information that is accurate...up to that point in time yes, what they're suggesting did in fact happen but there are investigations that have to occur, there are interviews that have to happen, we need to do all sorts of things internally to confirm or deny anything can be problematic to the outcome down the road. That's where there are legal considerations, that's where there's personnel...there are all sorts of considerations. Director Communications, Mass Transit*

*I always think that's an interesting predicament that you can get into as communications representing an organization...whether we're representing it or working in it, it's okay this has happened but we're constrained by legal, by the other investigations, we can't say anything yet but no matter what it's still out there. I mean you see it all the time in court cases – the alleged guilty can't say anything then all of a sudden when the time is up, they can jabber...you can say whatever you like but we're already passing judgment so it's that sort of delicate balance of what can I disclose? Vice President, PR Agency (1)*

### **3.3 Feedback From Focus Group B: Ethical Decision Making Part II of the Model**

In the comments below (Table 57) about the ethical decision making section of the model, two of the focus group participants discussed some of the implications of disclosing or not disclosing information. One suggested an organization may want to ask what the reputational cost may be of not providing the information and the other mentions the concept of who actually owns a company's information, is it the management or is it the employees?

**Table 57 Ethical Decision Making Focus Group B (267)**

*Director Communications Municipality (DCM): We do ask ourselves the question – what are the public opinion and credibility repercussions of not disclosing which is a huge, huge question and part of the ethical sort of consideration. So what is the PR cost, the credibility cost or the political issues that will...and other consequences that come from not disclosing?*

*VP PR Agency (2): Well, I might even throw out there – who owns disclosure? What we're finding is employees will disclose stuff before the corporate people will so it's sort of like okay, you may think you own the communication but I'm working in the factory and I know you're putting things on the line with peanuts and you're saying you aren't...you're going to get busted.*

*DCM: Yeah, we often try and get people to think about what they'll say at the inquest as their explanation for not having disclosed something that they knew was injurious to public health or another piece of legislation.*

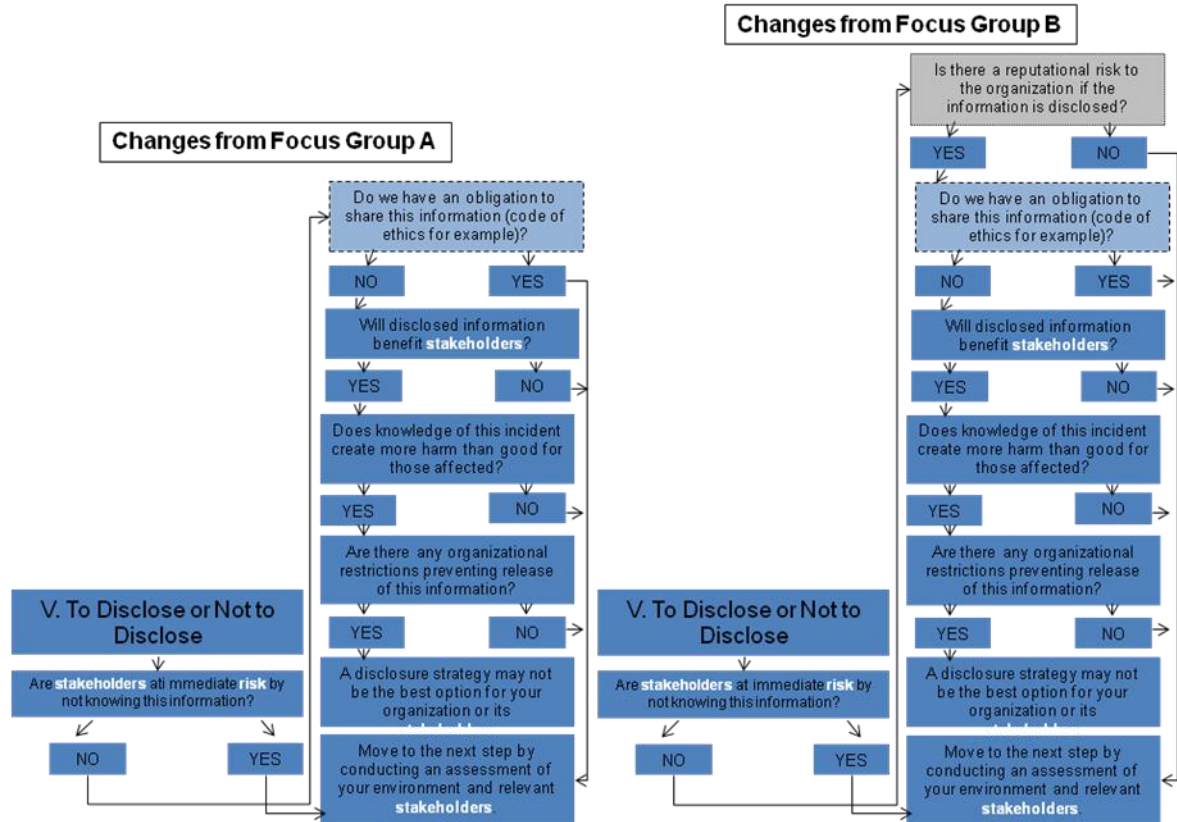
*I thought that was the...does knowledge of this information create more harm than good because after the fact when word gets out that there was a bomb scare, then it becomes the whole question of should people have been told?*

*Years ago when I was an employee in a place where there was a bomb scare and they didn't tell us, I was outraged but now that I do communications for an organization, I know that bomb scares are you know...A dime a dozen and so if you went out with it publicly, then there would be copycats, anarchy, you just couldn't get...nothing would happen. But the problem is with the one that's real you know, that would be a tough one to explain.*

Although the point the communications director for the municipality makes above about the potential reputational repercussions of not disclosing seem to be parochial to the needs of the organization, it may be worth adding this question to the model. This feedback is somewhat similar to input received from an interviewee referred to in the first part of this study (Table 11, p. 129) who suggested his reasoning for making an ethical decision about disclosure would be based hypothetically, on what he would say on the witness stand of a judicial inquiry into the situation. The focus group participant quoted above starts out by mentioning the reputational interests of the organization but he finishes with a personal example of disclosing a bomb threat and that he would have preferred to receive the information but he recognized that it is difficult to do without creating panic. Comments from the Vice President of the PR Agency are also interesting because she seems to suggest that if the organization does not take responsibility for disclosing something, the employees who have knowledge of the situation may do it anyway. This situation would be similar to the concept of 'whistle blowing' that Miceli and Near (1985) researched and was mentioned in the Literature Review (pp. 40-45).

Based on the above feedback, another box will be added to the blue section of the model (new box shown below highlighted in grey) that will pose the question, 'Is there a reputational risk to the organization if the information is disclosed?' the 'no' response leads the person using the model to the decision box at the end to disclose the information but a 'yes' response points the user to the next question that was suggested from the previous focus group, which asks if the organization has an obligation to disclose the information. The intention here is to avoid someone refusing to disclose the information based on a 'yes' answer to whether or not the situation poses a potential reputational challenge. The subsequent questions about stakeholder benefit and causing more harm than good for stakeholders is an attempt to ensure disclosure decisions are made in the best interests of those who need to know the information. There is a risk in adding the 'reputational' question that people using the model could decide to withhold valuable information based on the perceived damage the situation might cause to an organization's credibility but my hope is that people will use the decision

tree and end up with a strategy that is in interests of the stakeholders who need the information to make an informed choice about the nature of the situation and how it may affect their lives.



### 3.4 Feedback From Focus Group B: Disclosure Communication Strategy Part III of the Model

One of the points that a few of the respondents made in this group (as evidenced in Table 58 below) was the importance of communicating a disclosure situation as quickly as possible and being as comprehensive as possible with the messaging by providing full details of the situation. There was no specific change suggested to the model as a result of this feedback but this point was also raised among a few of the interviewees in the first part of this study (Table 12, p. 134). The interviewees mentioned the idea of communicating quickly to ‘get ahead of the story’ and they believed that by doing this the organization would be able to ‘control’ the message. In this focus group, the notion of control was not mentioned. The explanation offered for communicating a disclosure situation was the efficiency involved in providing all of the information at once.

**Table 58 Strategy Focus Group B (270)**

Director of Communications, Mass Transit: *Get it...almost like ripping the Band-Aid off – get it out of the way, do it, here's why we're doing it and move on with your other messages which is really what's critical.*

*But absolutely there's an efficiency to it, Craig because I think what happens is as Kevin said I mean if you...we've done this on occasion...you go out with a news release or with a statement on an issue that you know is starting to percolate, you might as well lance that boil today and get all those hits out of the way and that's it, you're done.*

VP PR Agency (2): *Also I find if you are proactive with the disclosure, you have also prepared for all the various scenarios and are quicker to address early on, address whatever may be coming up or whatever you may have identified that is going to come up right up front...*

Director of Communications Municipality: *So we find the less communicating we do, the less disclosure we do the more inquiries we get from individuals and when we have to deal with individuals instead of disclosing it once, it's four or five times more work.*

When commenting on this section, three of the participants stressed the importance of communicating disclosure situations to employees prior to communicating to people outside of the organization to ensure people internal feel well informed of the issue. This was a theme raised in the interviews in the first part of this research (Table 20, p. 147).

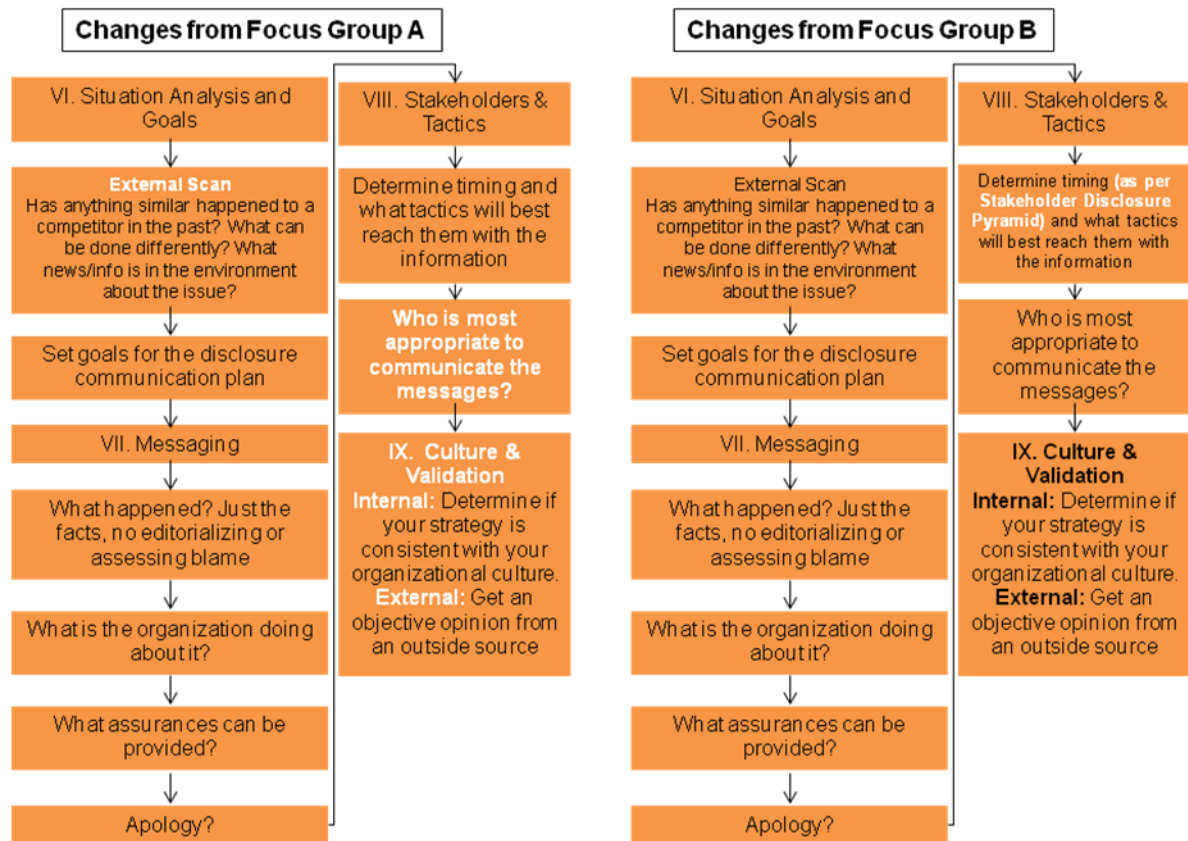
**Table 59 Strategy Focus Group B (270)**

Director Communications, Provincial Government: *I think something that I don't really see as part of the stakeholder audience but one of the critical points in the path, the disclosure path that I build in is just informing, like internal stakeholders first and so educate them so that when they're reading about it, they are able to put the rumours to rest but also be able to tell the truth about whatever is going on but they are in the know before it gets out into the media. I think that that's a really good strategy to managing sort of the rumour mill.*

Director of Communications Municipality: *Yeah, what a great point and you can't overstate that because there are not lots of times but there are times where we will make sure that lots of internal folks know about what's coming up only to discover that one of them has an additional piece of information that they heard or know or did themselves or something where they'll come to you and that will change the complexion of the communication that follows so that's important.*

VP PR Agency (1): *I see it deflate employee morale when they've seen it or heard about it outside. When I first started I worked for a pharmaceutical company and something happened and they were being accused of poisoning an old lady. It was my first day on the job...when I walked into the President's office and said okay, I just got a phone call. Dale Goldhawk says we're poisoning this grandmother so we have to talk. He's like no, no, fine and yet all the cameras were outside, then all the employees were like what's happening? The poor receptionist at the front door didn't know what to say when he came charging in so everyone kind of gets beaten up.*

There were no changes suggested to the model based on the focus group feedback. The tiered approach to disclosure that both the interviewees and the focus group participants in this session suggested is consistent with the 'Stakeholder Disclosure Pyramid' presented in Chapter VI (p. 215) but a wording addition to one of the boxes in this part of the model may make the need to communicate with audiences in a stepwise fashion more explicit. Additional wording is reflected in white text in the second box in the second column on the right side.



### 3.5 Feedback from Focus Group B: Evaluation Part IV of the Model

Focus Group B did not offer any specific changes to the evaluation portion of the model however, as can be seen in the text box below, a few people in the group mentioned specific evaluation tools they have used for clients such as scanning online mentions of the issue. Two of the focus group participants admitted they have had difficulty with evaluation in the past and have not spent much time on it. They said they may look at the resulting media coverage from a disclosure but for the most part they scan the headlines and then are on to the next issue.

**Table 60 Evaluation Focus Group B (272)**

VP, PR Agency (2): *Most recently we did something for a client where we looked...an online thing and said okay, this is where you're at, this is how your company is perceived, this is who you are today and then six months later because there was some news and change in the company. We were able to track the conversation online, not only online but with the media and with their key stakeholders and then look at it six months later. Fields that actually clearly demonstrate with charts, graphs and pretty colors show it's changed and how we were able to influence it or evaluate the situation so...did a survey. Are people feeling positive about your company now or whatever happened?*

Director, Communications, Mass Transit (DCMT): *Full disclosure Craig – I'm no good at this – at the evaluation part of it, the analysis of it*

Director Communications, Municipality: *I'm terrible at it. We spend a lot of time looking at what the media says but because we don't measure sales and everything is already over prescribed and there's no room on the streetcar anyway so it's not a customer issue right. We care a great deal about what people think about the quality of the service they get but that's a measurement of something entirely different then how the communications affect it so we do a lot of polling but it's too expensive to do it in a meaningful way and the issues are too large.*

*So we are day to day on the measurement part, I have to admit. We like the weekends because we think it gives people a good mental break...they forget things.*

DCMT: *I mean yeah, it's sort of look at the headlines that day and say okay, that's not too bad so then we move on.*

VP PR Agency (2): *It's not just okay, we've done it, we've said it, now we're finished, we're going to close the door. No, there's days after where you have to monitor conversation and seeing what people are saying.*

Director Communications, Provincial Government: *One of the evaluation tools that I have used is sort of an internal thing. You know planning kind of where will this thing go and let's sort of predict a different path. So did we get it right? Did we do the right thing? Were we quick enough? Were we...did we put the right things in place to deal with it? That's sort of an evaluation where we learn from the group and how we came together and what lessons are there going forward.*

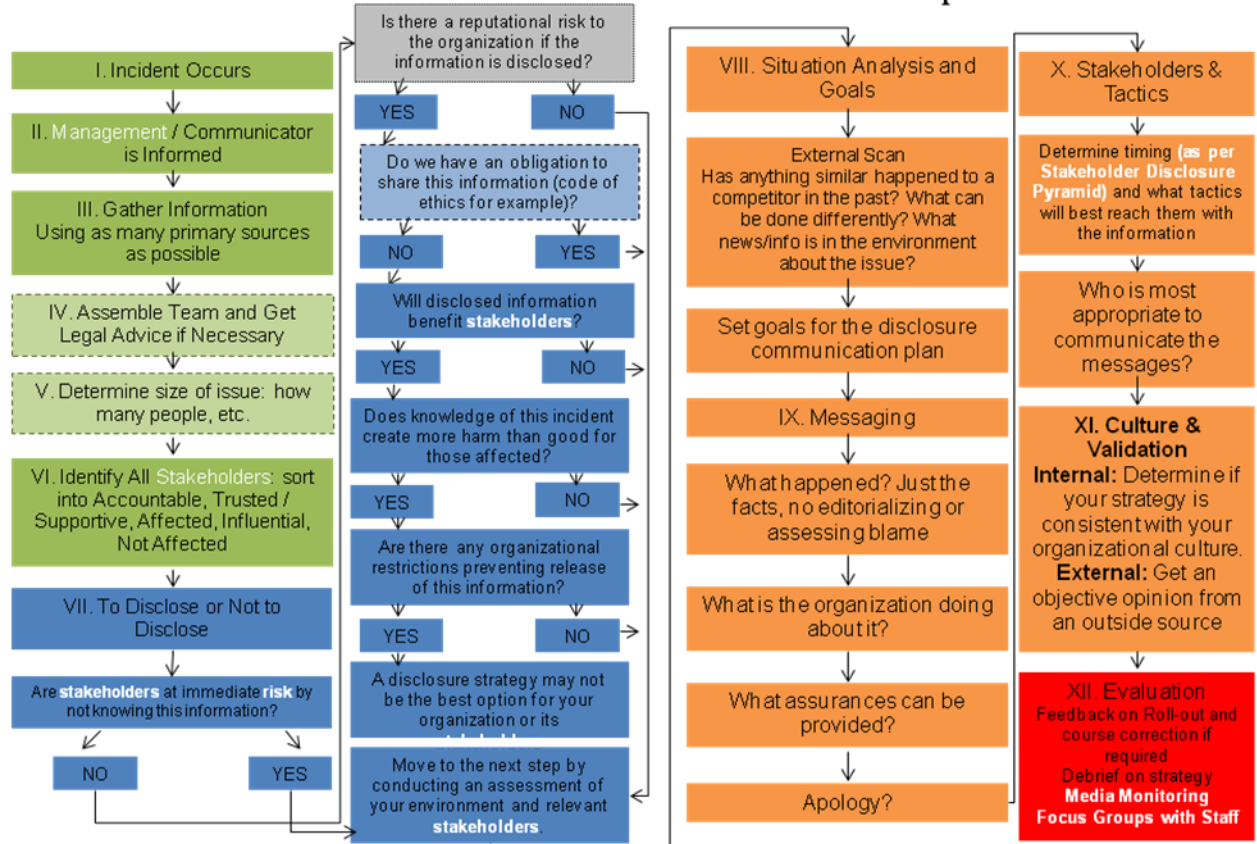
In the final quote on this topic from the Director of Communications for the Provincial Government, she mentioned conducting an internal evaluation which is similar to what a participant in the first focus group suggested so there is some validity provided for including this in the model.

### **3.6 Model Based on Feedback from Focus Groups A and B**

There have been some further changes made to the model but thus far, the additions and suggestions have not been radical. The model seemed to be fairly well received among this focus group and no one voiced a negative reaction. The revised model based on the cumulative feedback from the first two focus groups appears below. The additional boxes in the green and blue sections seem to strengthen the model but further testing is needed to determine the relevance of the model to a broader group of communicators beyond those who have participated in these focus groups.



## Model Based on Feedback from Focus Groups A and B



### 4.0 FOCUS GROUP C – HALIFAX, SEPTEMBER 24, 2009

#### 4.1 Introduction

I thought it would be helpful to get some perspective of practitioners outside of the Greater Toronto Area, so an attempt was made to hold two focus groups at the Communications Research Lab at Mount Saint Vincent University in Halifax, Nova Scotia. The first Halifax group was held in the evening from 7-8:30 p.m. and took place in one of the lab's sitting rooms which was set up in a café style with comfortable chairs and coffee tables.

Despite sending 40 invitations via e-mail, three weeks prior, to practitioners in the city through the IABC database, the group was undersubscribed compared to the Toronto sessions. The participants were invited based on the same criteria for the Toronto groups. For this session, four people were

confirmed to attend but only three showed. It was however interesting to hear the feedback of the three participants and they had some important commentary on disclosure that again added value to the development of the model.

### **Participant List Table**

<b>Participant</b>	<b>Job Title</b>	<b>Years of PR Experience</b>	<b>Highest Level of Education</b>	<b>Highest Level of PR Education</b>	<b>Sector of Employment</b>
One (F)	Manager	11-20 yrs	Bachelor's Degree	Bachelor's Degree	Police (Government)
Two (F)	Advisor	6-10 yrs	Bachelor's Degree	Certificate	Non-Profit (Health)
Three (F)	Associate Professor	20+ yrs	Doctorate	Doctorate	Education

### **4.2 Gathering Information Part I of the Model**

There were two main points the third focus group made about the opening section of the model. As is evidenced in the quotes below, the participants first commented on the importance of partnerships when an organization is managing a disclosure and second they suggested some clarity in the disclosure stakeholder pyramid about use of the term 'non-affected' public.

Specific to their first comments on partnerships, the Manager of Communication for the Police, mentioned internal partnerships with respect to being informed of the incident which is somewhat similar to the comments that were made in Focus Group A about 'management' being informed of the incident and telling the communicator. She also mentioned the importance of the organization having external partnerships prior to a disclosure issue or crisis. This is similar to a concept Ulmer (2001, p. 597) referred to as a 'reservoir of goodwill' that the organization should build with stakeholders well in advance of a crisis (Chapter IV, p. 151). The idea is that building goodwill in advance of a crisis, an organization can draw on this when necessary. There is an excellent example of this provided in the quotes below where the Manager of Communications for the Police Service used the help of a stakeholder group to use the correct terminology in its messaging and to find the most appropriate communication methods to reach the audience.

**Table 61 Gathering Information Focus Group C (275)**

*It does flow very logically. One thing that I'm wondering about is the communicator being informed of the incident. Maybe those should be a partnership with the management team and I know certainly you're identifying your management team or your leader, as you mentioned, in your stakeholder pyramid. I'm just wondering...certainly in my organization there's very much a partnership, it's collaborative and you do need that buy in and support. In some cases it's debating the different options and getting to this voluntary disclosure schema...it's like having great discourse.*

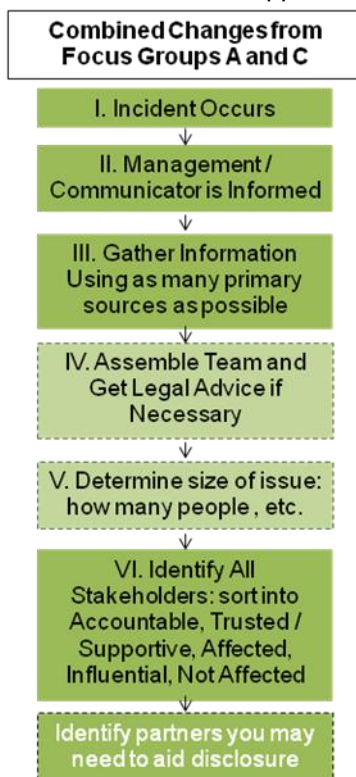
*And the other thing I'm wondering about if somewhere maybe there should be a box before #1 about setting the stage; making sure you have partnerships in place because I find in a crisis, you always have to rely on your partners and maybe that's part of your gut check I'm not sure there is always someone who is affected so in my case, in a lot of cases we're dealing with the school board. Manager, Communications Police*

*That partnership at the school board is vital before you ever get to a crisis. I don't know if there is some foundation that can be laid for perspective partnerships. Communications Advisor, Non-Profit*

*We had two men who were killed within days of each other and quickly realized that they were gay men who were not necessarily openly gay who were known to go to the cruising areas. We did not know what we were talking about. We were calling them scrolls which is not the right term and we called the Gay, Lesbian and Transgender Association and we already had a partnership with them but we brought them in to say what language do we use because we quickly realized we had to get out a public warning to gay men who were known to frequent cruising areas that they're at risk, their lives are at risk.*

*If I can speak to that again, it's so vital to have strong relationships internally as much as it is externally because then if you have the relationship and if you've built some credibility and if the communication function is highly regarded, then you are going to be second or third to find out. I report directly to the Chief of Police. If I didn't report to him, I don't know that I would want to work there because it allows so much access and he's constantly thinking about public image so we are the second or third phone call. Manager, Communications Police*

On the stakeholder disclosure pyramid, proposed in this research, there is a level of disclosure which occurs with 'trusted/supportive' publics. At this stage, the organization informs those who may be



able to assist in some manner in disclosing the information or in forming the strategy for communicating to other audiences. The 'trusted/supportive' publics could be considered as 'partners' similar to what the participants referred to in the above quotes. Since the two participants felt strongly about including the notion of partnerships, it may be worth including this as a specific box on the model. In the diagram, the change the two participants in this group suggested is highlighted in the box with the dotted border and the white text. Although the Manager of Communications for the Police mentioned that the idea of having solid partnerships should come 'before box #1', her comments seem to be referring to ensuring the organization has effective partnerships in place prior to a disclosure incident occurring, which is consistent with the advice Ulmer (2001, p. 597)

suggested. She mentioned in her second quote the importance of working with partners to help with

messaging and strategy. It may be best to include 'partners' under 'VI Identify All Stakeholders' as an important sub-section to this box. Her comments may also apply to a later portion of the model, likely under the 'Validation' section, where people are directed to solicit an external opinion of their strategy and messaging. It could be added there that the organization may want to consult specifically with a stakeholder group to ensure the disclosure strategy is meeting the information needs of the intended audiences.

A second comment about this portion of the model came from a brief exchange among the participants (Table 62) about use of the term 'non-affected public' in the stakeholder disclosure pyramid section of the model. One of the participants questioned how someone could not be affected by a disclosure and she wondered if the term 'customer' used in the descriptor for this section of the pyramid is accurate. She mentioned that not every company has customers per se but rather they should be referred to as people.

**Table 62 Gathering Information Focus Group C (276)**

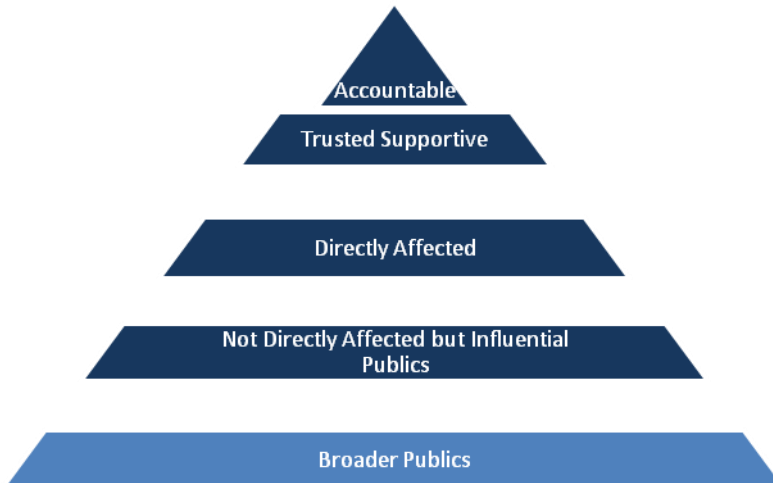
Associate Professor (AP): *The only thing that I would say is the non-affected public. Part of me says how can a person not be affected? Using the language to potential customers...well, this isn't a business situation. I think of it as in these two women's cases and in yours, these aren't potential customers, they are people, they're potential...I don't know like in your situation how could it be a non-affected public? Just the term makes it problematic for me. I don't think that there is a non-affected public.*

Communications Advisor: *Secondary?*

Manager, Communications, Police: *Or broader public?*

AP: *That's a good point.*

A small change in the wording of the disclosure stakeholder pyramid will be made based on the exchange above. This suggestion may help clarify for people that the final piece of the disclosure pyramid refers to those who may not be directly affected but could be considered a general population or as one participant above mentioned 'broader public'. Although one participant offered the term 'secondary', the term 'broader public' seemed to resonate better with the person who first suggested the change. The modification to the stakeholder disclosure pyramid is provided below (shown in light blue).



### 4.3 Ethical Decision Making Part II of the Model

There were no specific suggestions for changes to this part of the model but there was a good discussion about the question, ‘does knowledge of this information create more harm than good?’ One participant suggested that it depends on how you deliver the knowledge. Another participant built on this and shared her experience of disclosing bomb threats and incidents of crime.

**Table 63 Ethical Decision-Making Focus Group C (277)**

Communications Advisor: *I think that you know while you have to ask yourself the question – does the knowledge of this information create more harm than good for those affected? I think that it depends on how you deliver the knowledge.*

Manager, Communications, Police *We get bomb threats all the time and we don't disclose them but granted it's after we check to see; we take our bomb sniffing dogs and we determine that there was no threat but we don't tell people at the time. Now granted it's usually schools, usually right at the school and we haul all the kids out, we do our checks and we don't release it to the media.*

*I can only cite my most recent experience at police but at the end of every shift we release significant crime and in a lot of cases they're not random, there's not a threat to the community at large but it gets media play and there is in some case hysteria that result. It didn't need to go out so we're almost over communicating to our own detriment in the world of policing.*

In the quote above from the Manager of Communications for the Police Department, she suggested that more harm than good can result for audiences such as creating panic by communicating a bomb threat. She also provided a good example of how her department discloses the crimes that occurred after each shift. She said that this may be over communicating and even though the crimes are not random and do not pose a threat to the community at large, some hysteria does result from the subsequent reporting of crime statistics.

#### 4.4 Disclosure Strategy Part III of the Model

When talking about the strategy portion of the model, two of the participants from this group commented on the importance of looking for similar cases to manage the current disclosure situation. The first mentioned she would call someone outside of the organization to see if something similar had happened to her friend's company. This comment also provided some further evidence for the inclusion of the 'Validation' box in this section. Her comments also suggested that the tone of the model changes in this section from the previous 'philosophical' or ethical discussion to something that is more 'pragmatic'. She commented that maybe the tone of the questioning could continue in this portion of the model. Her recommendation was to replace the question, 'has anything similar happened to a competitor in the past?' with 'what are the detriments if we don't disclose and what are the potential scenarios?' The first part of her question was suggested in Focus Group B and has been added to the blue section of the model. Her last question though, what are the potential scenarios involved, is an interesting one and although it has not been suggested previously, it may be worthwhile to include as a prompt question in one of the boxes in this section.

##### **Table 64 Strategy Focus Group C (278)**

*I probably would have called my girlfriend in the beginning to see if anything similar has happened to them. One of the things that struck me right away was under the Situation Analysis and Goals is you have from #5 on as sort of this altruistic sort of philosophical inventory that you go through and all of a sudden it becomes extremely pragmatic. I wonder if it couldn't be carried on? Instead of "has anything similar happened to a competitor in the past" asking yourself what are the detriments if we don't or what has happened in the past; what are potential scenarios? Associate Professor*

*I was going to say that I wonder how practical it is? I guess when I read this, I'm thinking oh, I should write down my situational analysis and goals because there's a process map that I'm following but in reality you don't have the time to write down a situation analysis. You're just doing that I mean for discussion maybe around the table.*

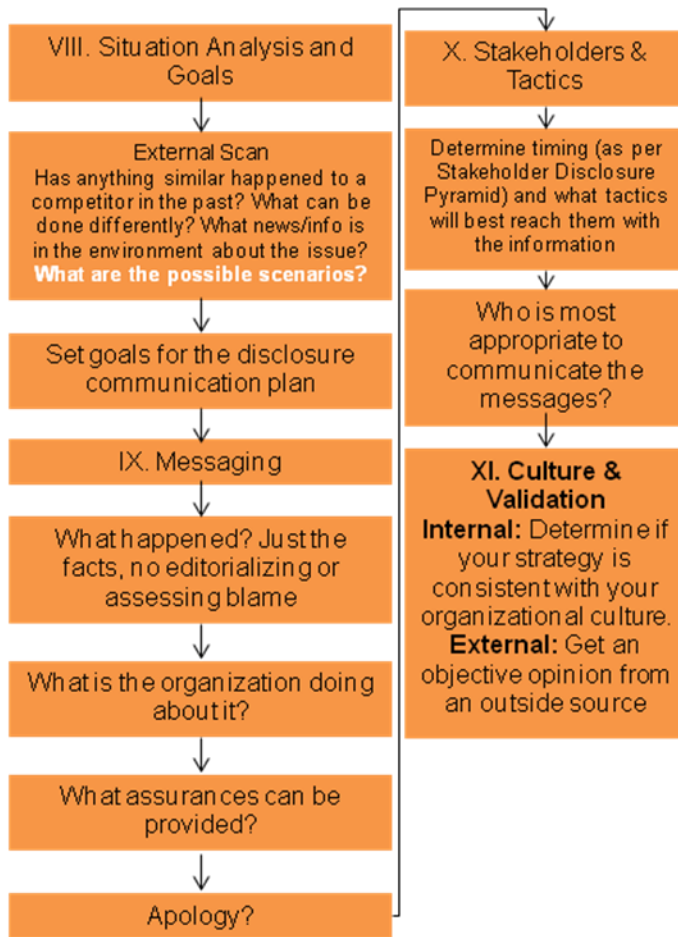
*It does relate to the whole situation analysis and the whole competitor. We had tazed man named XXX and I want to say 36 hours later he died in the Correctional Facility...well, he went into cardiac arrest in the Correctional Facility then later died I believe en route to hospital. I went to the management team and said um, we have a problem. They said it's not our death. This is directly on the heels of Vancouver Airport and I said doesn't matter whether he died in our custody or their custody. We tazed him and now he's dead. We have a problem.*

*They said no, no, it's not ours to communicate. I said oh yes it is. I was really being an advocate for the community because they deserve to know that this happened and it's similar to, not exactly the same as Vancouver but there's some linkage here. Our competitor, a partner, had just gone through something very similar. This is very timely. It is very relevant. We need to communicate it. We need to get out front and fast.*

*There was certainly a situation analysis done. It was all done very quickly. It wasn't done on paper but it applies very much and it takes into account the competitor or partner whose lived through something very similar so I think this is very applicable. To my own point, you don't need to write it all down but this will guide you through the process and then you'll arrive at the right place I think. Manager Communications, Police*

Feedback above from the second participant provided some evidence for the external scan section and referenced a specific case that her employer went through regarding a tazing incident (where police shoot electrodes into a person to subdue them) which was similar to a situation that happened in an airport in Vancouver where officers tazed a man who died as a result. This is an excellent example of using a similar situation to build a case for a disclosure strategy. She mentioned the idea of 'getting ahead' of the story which was also a concept that surfaced in the interview data (Table 12, p. 134) and in Focus Group B. What was also compelling about this quote was that she saw herself as an advocate and used a precedent setting case (the Vancouver incident) to move her strategy forward and help her senior team make an informed decision about disclosing the information. The notion of practitioners acting as advocates is discussed in Chapter IV (Table 37, p. 179).

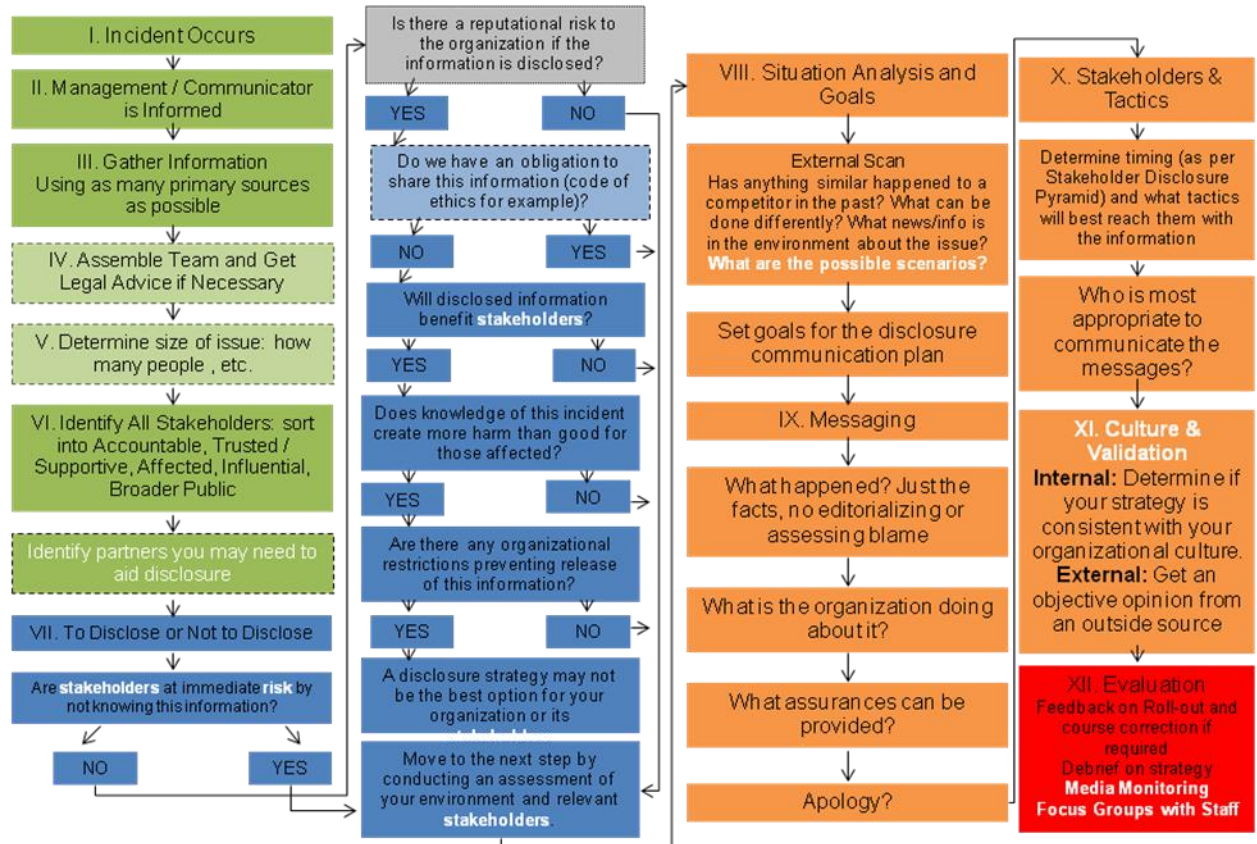
Another point the Communication Manager quoted above raised is the practicality of conducting a comprehensive situation analysis. She questioned whether or not there is time to do this and write it down. Her point is an important one. The questions used in the model should be seen as 'prompts' and ideas to think about while building a disclosure strategy. It is not intended to be a framework to write a full communication plan. She made this point at the end of her quote by saying, 'you don't need to write it all down.' She may be quite correct in saying this and the intention of the model is to be a 'quick reference guide' to help people structure their thoughts during what can be a difficult situation. The model is intended to be a sort of 'pre-flight checklist' for communicators who are helping their organizations make decisions about disclosure. A small change made to the 'External Scan' box that the participant above suggested has been highlighted in white text below.



There were no suggested changes to the evaluation section of the model from this group. Based on the feedback from the first three focus groups, the consolidated changes are presented below.



## Amalgamated Changes to the Model from Focus Groups A, B, and C



### 5.0 FOCUS GROUP D, TORONTO, NOVEMBER 16, 2009

#### 5.1 Introduction

After gathering data from individual practitioners, a logical step in the research would be to approach a team of communicators to gauge their reaction to the model. A focus group with a team would provide an opportunity to learn from a group who work together as opposed to individuals who were invited to the first three groups. As mentioned in the Methodology (Chapter III, p.100), Strauss and Corbin (1998, p. 203) suggested theoretical sampling is cumulative and each sample builds from and adds to previous data and the process becomes more specific over time. In this case, it seemed appropriate to work with a team of communicators who manage issues, crises and disclosures on a daily basis.

I sent an e-mail to Denise Cole, Principal of Strategy Corp, a local communications and government relations firm. I had the opportunity to work with Denise six-years ago (2003) on a disclosure issue and felt that it would be appropriate to reach out to her for this research. I had not spoken to Denise in six-years but she was receptive to the idea and she asked her colleagues to join the group. I had never met any of her colleagues but knew them by reputation (please see bios in Appendix D). Strategy Corp represented a collection of highly skilled and experienced practitioners and the opportunity to include their thoughts in this research could not be missed. They were kind enough to host me in their Boardroom for about two hours one evening from 4-6 p.m. and we discussed their thoughts on the model. As powerful political operatives, advisors and decision-makers, they provided wonderful insight and shared their candid experiences with disclosure that stem from the backrooms of every level of Canadian government.

#### **Participant Table List**

<b>Participant</b>	<b>Job Title</b>	<b>Years of PR Experience</b>	<b>Highest Level of Education</b>	<b>Highest Level of PR Education</b>	<b>Sector of Employment</b>
Denise Cole (F)	Principal	11-20	Bachelor's Degree	Bachelor's Degree	PR Consultancy
Leslie Noble (F)	Principal	20+	Bachelor's Degree	NA	PR Consultancy
John Matheson (M)	Managing Partner	11-20	BA, LLB (Law)	NA	PR Consultancy
David MacNaughton (M)	Chairman	20+	Bachelor's Degree	NA	PR Consultancy
Dave McCleary (M)	Senior Consultant	20+	Bachelor's Degree	NA	PR Consultancy
Katie Telford (F)	Senior Advisor	11-20	Bachelor's Degree	NA	PR Consultancy

#### **5.2 Feedback From Focus Group D: Gathering Information Part I of the Model**

In the set of quotes below, two participants commented on the initial few boxes that appear in the upper left hand portion of the model. There was support for the use of partners or 'third party validators' who can help provide help for the disclosure situation. Leslie Noble talked about the use of 'third party experts' to add credibility to the organization's message and 'spin' it into positive territory. As mentioned in Chapter IV (p. 116), Hofstede (1980) suggested the use of experts as an 'uncertainty avoidance' strategy (p. 118). Interestingly, Hofstede commented that whether or not the expert can apply more information, insight or skill is immaterial as long as the organization views the

'expert' as transforming uncertainty into certainty (Hofstede, 1980, p. 118). The theme of using experts will resurface later in this section (p. 291) when the discussion turns to the use of consultants to help organizations through these situations but in this context the quote below is referring to a 'third-party' partner of the organization that may be able to help it navigate the disclosure situation. As mentioned in the previous focus group, the example of the police force using the gay and lesbian organization to reach the community to warn of the potential threat to their safety, the use of partners in these situations has been given some further validation by the comments here. However, the use of the word 'spin' in the quote is a bit concerning. If the organization is going to consult a third-party partner for help, the intention should be to use this alliance as a method of assisting the organization in communicating and shaping the message to affected stakeholders rather than 'spinning' the organization out of a negative situation and into a positive light with its publics.

**Table 65 Gathering Information Focus Group D (283)**

*In this box and maybe elsewhere but you know sometimes those third party validators are good in actually turning your crisis into a positive. How do we verify it? So you kind of turn a negative into a positive and we'll be the leaders on this by engaging these third party experts that help us move around initially so it's not just message deliverers but actually sort of using it as kind of a judo move to actually spin yourself into positive territory. Leslie Noble*

*You know one of the biggest issues in...that first meeting with five or six people are in the room is actually getting the five or six people to agree on what's important because that is often a problem because two of them are usually thinking that what's important is the fact that they are going to be in the paper. The other four are thinking boy, he's going to be in there [Laughs]. John Matheson*

*You're assuming that there's a discreet single incident but often times, in fact there's two incidents; there's the thing that happened and then there's how much your team fooled around before it got to management so for example if you looked in the paper the other day there was this thing about one of the churches where – the story was about these two did something bad but it was far more about a bishop who actually was perceived as being part of a cover up and the real damning was the "church that's gone wrong". The bishop was part of the institutional cover-up. Leslie Noble*

In the second quote above, the participant commented on the usefulness of assembling a team (noted as box 'IV' in the model). He provided some insight into his experiences of when the team first assembles to discuss a disclosure issue. His comments referred to personal agendas that may sometimes be at play when the team comes together to discuss an issue. Although this comment does not suggest a change to the model, it may be helpful for practitioners who are addressing these issues to understand what the underlying motivations of people may be in terms of making a decision about whether or not to disclose an issue. This may not be easy to determine unfortunately and may require some probing on behalf of the communicator to get behind the rationale for a decision or a person's point-of-view, who is participating in the decision-making process. It is quite

conceivable that the major influence on decision-making about these types of issues could be self-preservation rather than a genuine concern for a stakeholder group.

There was no specific change suggested to the 'Gather Information' (box III on the model) but the participant provided some cautionary advice to ensure the communicator researches and understands the issue thoroughly. She talked about the possibility of being more than one issue and mentioned that the team's response may become part of it if there is a delay in providing the information to stakeholders. The primary issue may be what actually happened and a secondary issue could be how the organization chooses to manage it. A schematic such as the one presented in this thesis, might improve how decisions are made in these situations and make them more efficient but this is something that will have to be determined through further study.

In the box below, an exchange between two participants revealed a modification to the model that involved a move of a box in the orange section to the green. The suggested change is reflected in the model diagram below (in white font in the image on the right).

**Table 66 Gathering Information Focus Group D (284)**

John Matheson (JM): *The one that I keep getting stuck on is the first box in the orange part.*

Moderator: *Right.*

JM: *If you've gone through this whole process; green, blue and determine maybe but you don't think you need to disclose and then you get to something that tells you every one of your competitors has or something, then you're going to have a hard time. I'm wondering whether this situation analysis part of that really needs to go into the gathering information side.*

Dave McCleary (DMC): *Yeah.*

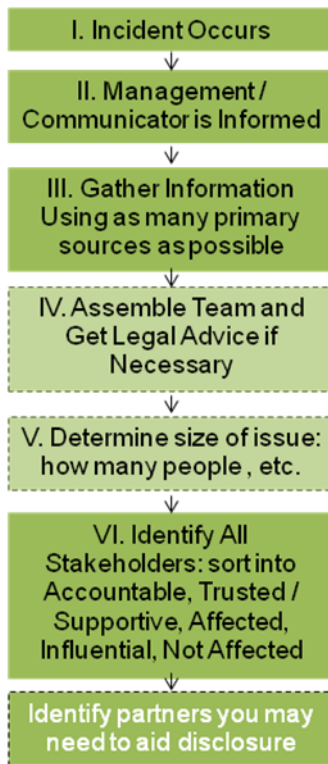
JM: *Because we would automatically do that. We would already be doing an environmental scan, we'd be taking a look at what's the playing field look like here, who are all the players, what are the relevant points of view. Everything from set goals down through the orange is about next steps with the exception of that box which is looking backwards.*

DMC: *Yeah, when you look at the questions as well. That whole upfront piece has got to include some of the scan of who is not causing problems whereas externally, internally, that's all part of that environmental scan.*

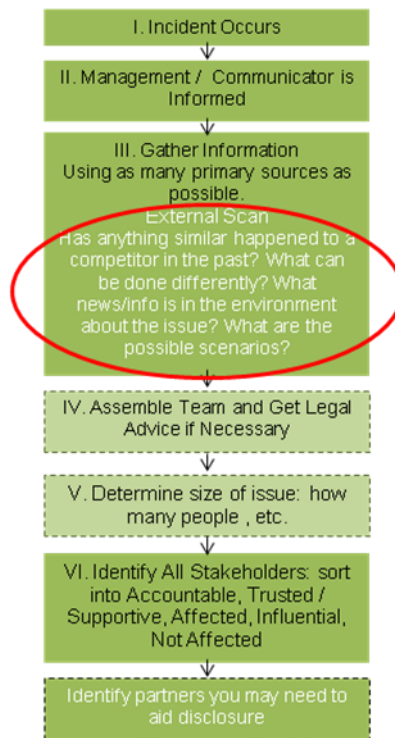
Moderator: *So these are gather information questions?*

JM: *Yeah.*

### Combined Changes from Focus Groups A and C



### Changes from Focus Group D



### 5.3 Feedback from Focus Group D: Ethical Decision Making Part II of the Model

A few members of this group talked about the issue of timing of the disclosure (see text box below). It would seem from their experience in the political world that they have all been privy to information and have struggled with the decision about when to provide it to the public. Similar to the bomb threat examples that were brought up in previous groups, this group talked about having the burden of knowledge which if released may or may not cause public panic. As former political advisors, it is not surprising they would have this level of experience and be asked to render an opinion about when to release information that could impact an entire community.

Which moral framework would apply in these situations? Should an organization be deontological about things where it has a stated policy about disclosure, regardless of the effect it may have on people? This may work in the second quote below with respect to the color coding of terror threats in the United States. The Department of Homeland Security discloses threats and provides people with

a color that corresponds to the perceived severity of the threat. In this case, the Department is being open and honest with the public but is it also desensitizing people to the threat level? In the third quote about a potential leak of radioactive material at a nuclear power plant, the participant asked the question about when is the optimal time to tell people about this kind of situation? An organization may run the risk of causing panic if it releases the information and people flee the area but if it chooses not to let people know and something happens to harm the community, will the organization be criticized for not acting soon enough? His comments are consistent with consequentialist reasoning but this may also not be the best approach.

Quotes from the participants below do not provide a suggestion or solution to the ethical issues that are presented with these situations. Their lack of advice here may be indicative of the difficult nature of these issues and the best answer to the question about which decision is the most ethical might be 'it depends'. In Chapter V (p. 190), Sherwin (1999, p. 202) mentioned that a combination of moral frameworks such as deontology, virtue theory and utilitarianism, may be the best approach and that using one alone may not be the solution. The point of the model however, is to provide a framework for these discussions to occur and ensure that they happen with the interests of both the stakeholders and organization in mind.

**Table 67 Ethical Decision-Making Focus Group D (287)**

*There's also part of the disclosure in terms of disclosing when you didn't disclose earlier. When I was in the Prime Minister's office in the late 80's and there was...probably nobody else remembers this but there was a Chilean fruit incident with cyanide where we got a call from the FDA that somebody had injected oranges coming from Chile with cyanide and most of our fruits that we get in the winter time came from Chile. I remember it was a big discussion as to whether or not the Minister of Health and the Solicitor General should let the public know. The decision was mixed because the FDA had advised that their intelligence and all that CSIS (Canadian Security Intelligence Service) and so forth found that it was a hoax. A week later got a call that they had found in a shipment of oranges in Philadelphia I think it was – traces of cyanide and at that point in time it was decided yeah, better disclose. So part of that disclosure then became why the decision was made a week earlier not to disclose. Denise Cole*

*You know when they set up the Department of Homeland Security after 9/11, I have a good friend who was involved in that and the whole threat level colour coding that you see everywhere – part of that was to absolve themselves of the liability of not doing warnings so they regularized the warnings so they wanted to prevent panic. On the other hand they didn't want to be held politically accountable for not actually giving due warnings so there's a regularized thing. People will become sensitized to it. You see oh, it's orange today, it's yellow, it's this, it's that...you might make the 12<sup>th</sup> item in the news now when the threat level goes up to about orange or red or something but that whole discussion was around what is the balance between panicking the public and reducing the liability? Leslie Noble*

*But you can go all the way from let's say OPG (Ontario Power Generation) finds out a problem with Pickering (nuclear) reactor and they don't get at it soon enough, it could...you could have a problem. They think they're going to be able to get at it soon enough. By disclosing the fact there's a problem could cause evacuation and you could kill a bunch of people. So do you use disclosure and when do you disclose? David MacNaughton*

*When do you disclose that there's a leak of heavy water into the Ottawa River? When it reaches surfaces...Do people deserve to know that there is a non-health risk level that is a slow drip or do they only deserve to know when it surpasses the level that all experts say is a health hazard? Leslie Noble*

A specific change from John Matheson, is recommended below to the blue section of the model, where he suggested flipping the order of two of the boxes. He mentioned that the flow of questions seemed to be out of order and that an organization should not be considering the question of reputational risk prior to understanding if there is an obligation to disclose the information. If there is an obligation to provide the information, from a legal perspective or otherwise, then the organization should not dawdle in its action. The change to the model is shown below.

**Table 68 Ethical Decision-Making Focus Group D (287)**

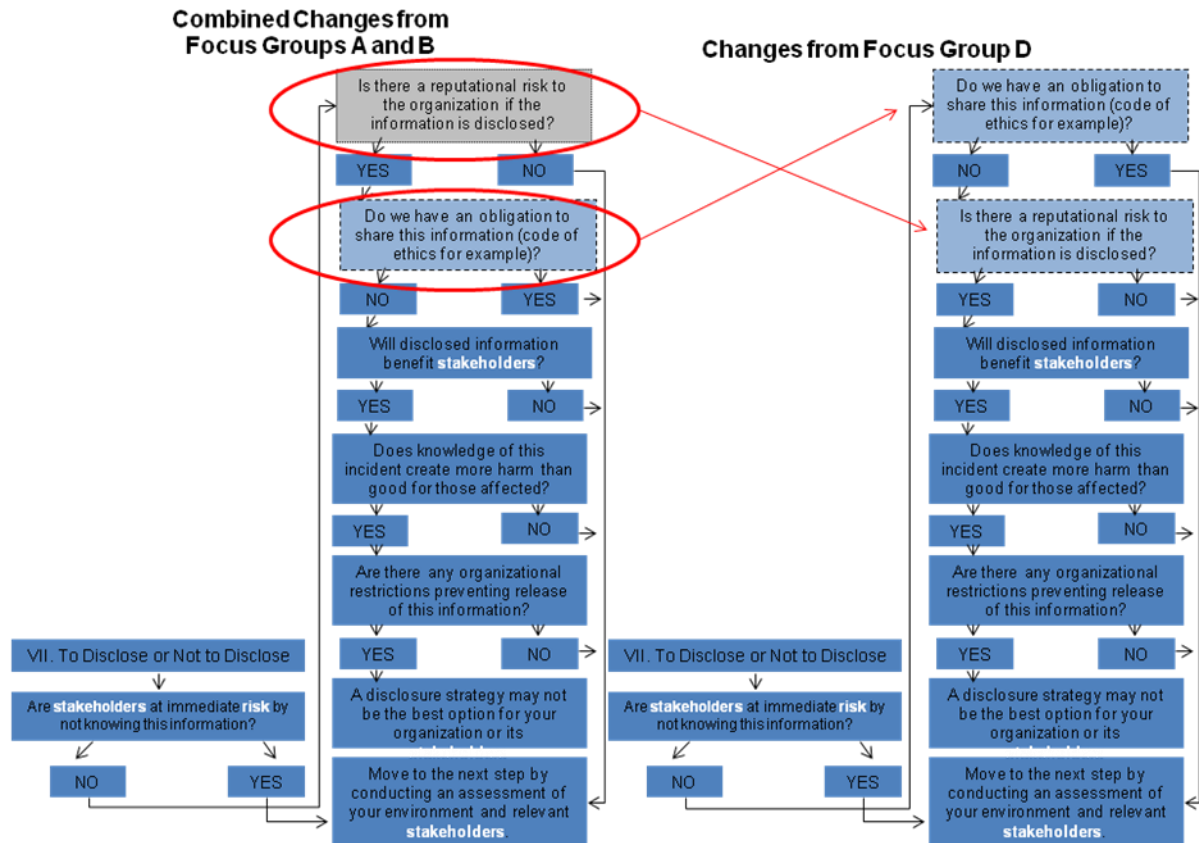
*John Matheson (JM): Back to the blue for a second...The top question there is – is there a reputational risk and then other ones follow after. I might have thought from an issue management perspective somebody might take offence if you were to suggest that – that you would ask is there a reputational risk before you ask do we have an obligation to share the information. No, but I think that one goes direct to...if I were going to tier them on the tip disclose and not to disclose, I would have had if people were at risk or if you had an obligation to disclose, you wouldn't ask is there a reputational risk.*

*You would actually go next too and I think somebody might take umbrage with the notion that if this truly means to communicate the sequence of them, you might be better having two which lead directly to disclose because I know my nice friends at the Law Society, if I had an obligation to disclose something they wouldn't be very happy if I spent half an hour discussing reputational risk. They just want me to disclose it.*

*Moderator: It brings up a bigger question I guess – does that question even belong there?*

*JM: Oh, I think if nobody is going to get hurt and if you don't have an obligation to disclose it, so you're into the world where should I disclose it as opposed to I must disclose it so it's totally appropriate; I'm just not sure that it's appropriate to...since you're drawing a distinction between ones which lead you immediately to disclose as opposed to disclosure after I've thought about it for a little bit signalling if there's risk or if there's an obligation, then I don't think about it so much.*

*Moderator: Great point. Thank you.*



#### 5.4 Feedback From Focus Group D: Disclosure Communication Strategy Part III of the Model

There a few comments made about this section of the model, which included one change to the diagram. One of the points (evidenced in the text box below) involved an exchange among three of the participants who talked about the importance of internal communication with respect to instilling discipline in the messaging about the disclosure situation. They talked about ensuring consistency in the delivery of the message by educating internal publics about the situation. The idea of communicating with internal audiences prior to releasing the information to the public was mentioned among a few of the interviewees in the first part of this study however, they seemed to approach the idea from a different perspective than the comments the participants in this group shared (see Table 20, p. 147). The interviewees who talked about informing internal audiences prior to external ones, in the first part of the study, mentioned doing so as a courtesy and not as risk mitigation strategy as it is described below. The difference in tone may be related to the experience of the practitioners. The communicators in this focus group are former political advisors who managed issues that were highly



visible and were under the constant scrutiny of the media. Communicators in the first part of the study did not necessarily work in this kind of an environment. The interviewees worked mostly for organizations that were not under the daily eye of a political press gallery so their approach to communicating disclosures internally may have been for a different reason but the point is made in both phases of the research that internal audiences are important in disclosure situations.

**Table 69 Strategy Focus Group D (289)**

Dave McCleary (DMC): *The one box – I appreciate how you manage your internal issues to your internal organization is incredibly important. I mean I've seen situations, for example sewage treatment plants still where they're up there in all this messaging and the reporter shows up at the sewage treatment plant and talks to an operator...*

Leslie Noble: *The guy blows your entire...*

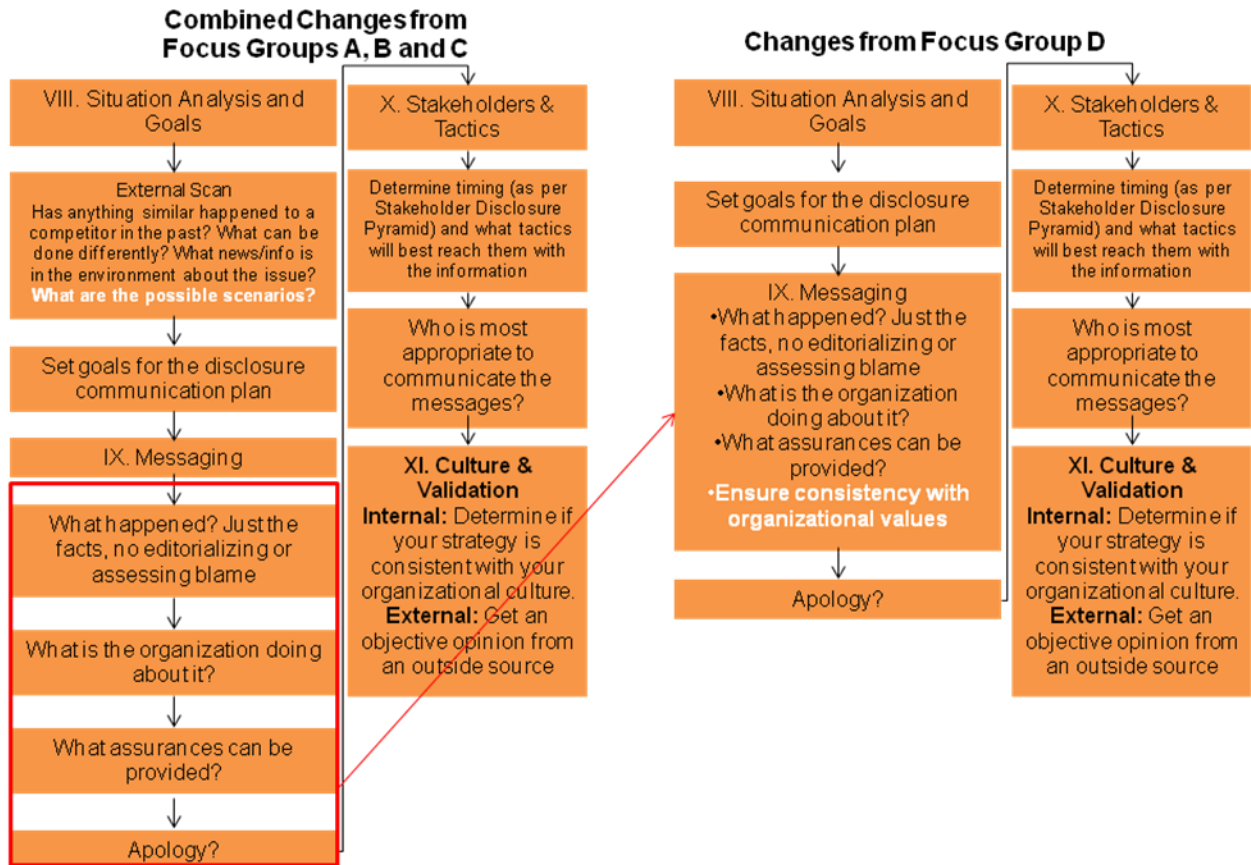
DMC: *Blows the thing right out of the ground.*

David McNaughton: *At the hospital, if you had...maybe you've got...say something happened on a clinical trial or something and you've got also at your hospital the head of the disease group from the clinical trial that's going on and something goes wrong over here and this guy is saying yeah, they didn't have the right...you know that would be kind of an immediate...like he has the potential to completely destroy your issue management if he's not briefed.*

A change that was suggested to the model came from John Matheson quoted in Table 70 below, who made the observation that the separate boxes under the 'messaging' section should be collapsed into one. He also put forth the idea that the organization's values should be included in the messaging. His rationale for this was that you will, '*get much further (with audiences) communicating values and motive than you do with facts....*' What he means by this is that by expressing empathy for the affected audiences, you may engender trust with them as opposed to relying on just the plain facts of the disclosure situation. Communicating values was mentioned in the interviews (Table 16, p. 143 and Table 27, 160) and it was captured in the first version of the model under the heading 'Culture' (pp. 240-243) however, the mention may not have been specific enough and did not use the actual word 'values'. The caution here was mentioned in Chapter IV (p. 142) where Pratt (2004, p. 19) wrote that organizations should avoid self-promoting language in their messaging. The changes the participant suggested (quoted below) are provided in the diagram below (change in white font).

**Table 70 Strategy Focus Group D (289)**

*In the orange section, there are about four or five boxes that come under messaging, which I don't think is so much five boxes to me as it is one big box ...maybe the apology one deserves its own because that's a distinct pack. If it's a competition between communicating values and motive or empathy for the trouble people are having versus just the repetition of facts that you actually get much further communicating values and motive than you do with facts and the people kind of hear the facts as blah blah blah blah but if you say – the magic words are "we care and we're trying to do better, I feel your pain, we're going to fix it" that those are critical things. John Matheson*



In the final comments on this section of the model, two of the participants (quoted in Table 71 below), mentioned the importance of the 'XI Validation' box. As consultants, it is not surprising that they see the merit in this section but they made two points about contacting external help that are worth mentioning. The first is to seek help in these situations with someone who may be used to dealing with disclosures on a regular basis. This person may be able to provide advice based on the experiences of other organizations who have dealt with similar issues. The second point is an important one which refers to the power relationship communicators may encounter in their organizations. An external consultant may not be as influenced by the company's political environment as an internal communicator and as a result may be able to make an unpopular recommendation without fear of reprisal.

**Table 71 Strategy Focus Group D (291)**

*At the risk of sounding completely and totally self serving, it is probably the case that any organization needs to have outside advisors because you know you're actually not going to do 20 in year so that you're experienced enough to know how to move it on a regular basis so no matter how well we've thought about it before and how well you've planned it, it is a situation where you're going to...it's like a corporation when they bring in a merger and acquisition they hire advisors because they don't do that work every month. David MacNaughton*

*It is pretty brutal if you are a director of communications along with the vice presidents; suppose you reported to a VP of corporate services who is the lawyer whom you met every two weeks so all of a sudden you're told to come up to the executive suite because there's this problem and oh, by the way it's the senior vice president of operations who screwed up who everybody figures is the next CEO. You get to start making calls about what the disclosure is... John Matheson*

If a communicator is in a situation where she feels that making a recommendation about the disclosure that could result in an action from another member of the senior team that could jeopardize her career, it may be wise to find external counsel who can offer the organization an opinion on the situation.

**5.5 Feedback from Focus Group D: Evaluation Part IV of the Model**

There were no specific changes to the Evaluation section of the model but the comments (Table 72 below) from three of the participants reiterated points made earlier about getting constant feedback from audiences as the disclosure strategy is implemented (Chapter VI, p. 245). Another point made below, which reinforces the mention in the model, is the idea of debriefing afterwards. This was also mentioned in Focus Group A (p. 264), where one of the participants said his organization meets routinely with internal stakeholders to gauge their perception of how an issue was communicated.

**Table 72 Evaluation Focus Group D (291)**

*One of the things that's very helpful and keeps everybody on the page is to know your objective and so the question you have is okay, so what does a good outcome look like and what's the worst outcome look like? At each stage of the process, you ask that question and what should happen is to narrow as you go through it but it is a distinct thing that the issue management team should be asking itself that question because what happens is it sets what you're trying to achieve. Dave McCleary*

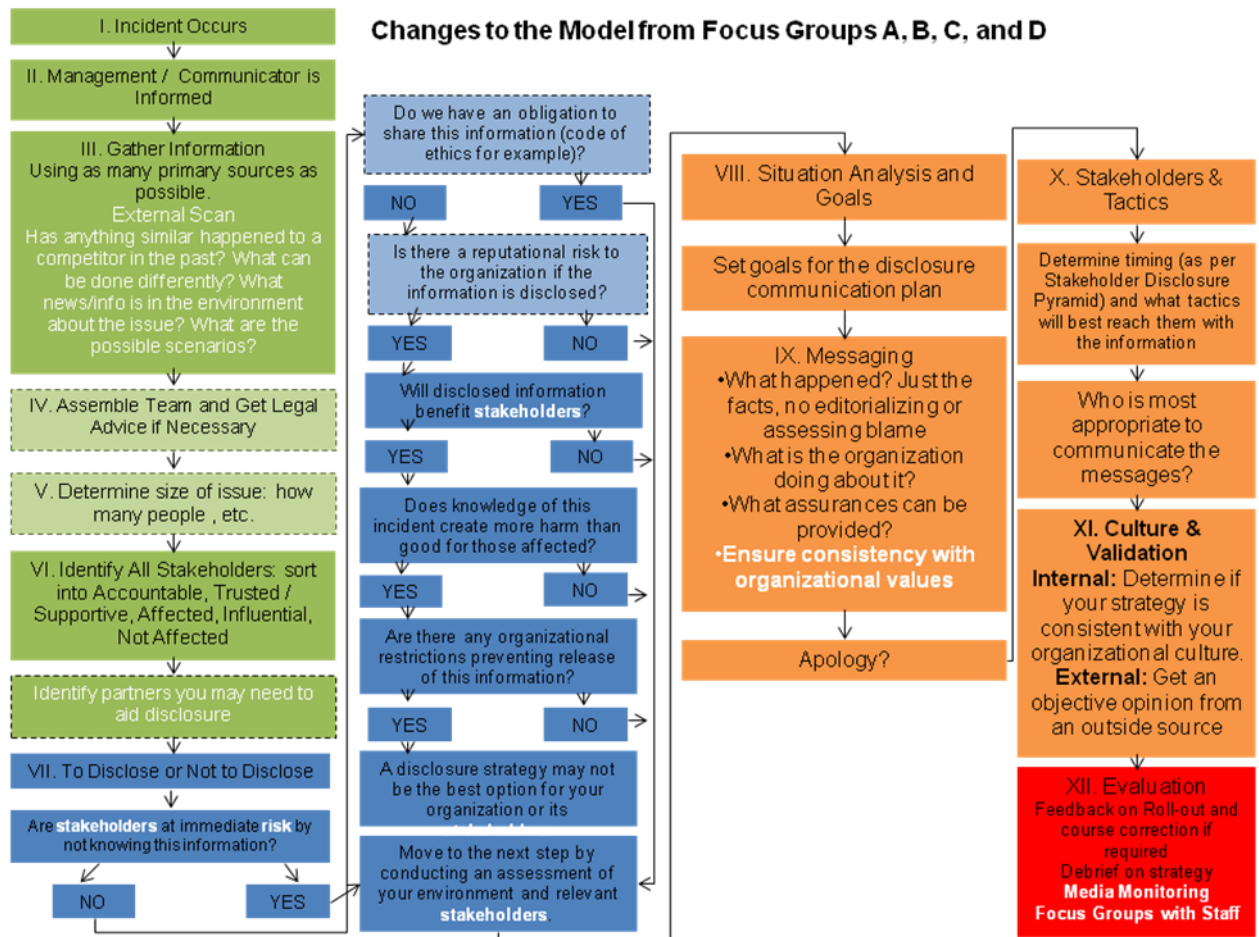
*Generally speaking, if you're around to do the evaluation, you're in good shape! John Matheson*

*I think there's a whole roll out we would put into place like a war room basically and our quick response unit so that as media is arising you're instantaneously going to respond to it so it's not just monitoring but it's a constant sort of small strategy group that's always available and you are gaining feedback...kind of now, hourly really when you've got a crisis going on and that's sort of in the middle of it all. Leslie Noble*

*At the end of it, once it's all said and done, it absolutely needs to be kind of a retrospective – what went right, what went wrong, what would you do differently, who performed well under fire. Leslie Noble*

## 5.6 Saturation and Combined Changes to the Model

As mentioned in the Methodology (Chapter III, p. 109), saturation occurred with the focus groups after four sessions. When commenting about the idea of achieving saturation, Strauss and Corbin (1998, p. 136) wrote: *'There is always potential for the new to emerge. Saturation is more a matter of reaching the point in the research where collecting additional data seems counterproductive; the new that is uncovered does not add that much more to the explanation.'* In this case, there were some helpful suggestions made to the model through this process but by the fourth group, there seemed to be repetition in themes such as the discussion about when to disclose and the timing that is best for the organization and audiences. There were minor changes suggested but nothing major. The encouraging part about the groups and their discussions is that no one rejected the notion of having a model for these situations and in fact some support was expressed for the concept of having this type of tool available for communicators and their organizations (see p. 294). In the diagram below, the revised model is presented based on the combined feedback of the four focus groups.



### 5.7 General Comments about the Model

I asked the focus group participants for their general thoughts on the model and if they thought it would be a useful tool for practice. There were several interesting comments (provided below). The first comment from the Director Communications, Municipality spoke about how the model is different from relying solely on your intuition to make these decisions. The second comment from the VP of a PR Agency was also revealing. She suggested that the model might be a great tool for younger communicators to use to help them through these difficult situations. Another communicator commented on the ‘tangible’ nature of the model and that it could be used as evidence to advance a disclosure strategy. The final comment echoed the sentiment of the previous person and mentioned that the model is ‘very practical’ and it spoke to her in her day-to-day life as a practitioner.

It is encouraging for me to know that this has had some relevance to a small group of communicators and although the model has not been subjected to rigorous quantitative testing, this feedback demonstrates that there may be opportunities to further research the application of the model in different settings.

**Table 73 General Comments Focus Groups (294)**

*Yeah, I think you can trust your intuition if it's based on precise similar experiences maybe but you're not doing the institutional memory any favour or any governance kind of structuring favours because then you're making decisions based on who happens to be the person in the job at the time so intuition is too judgmental a call. But I mean your intuition and your sense plays a big role but I wouldn't give it like I've been talking about the veto. It wouldn't be this is how I feel today. I don't think that would do it. I think it does to your point give a sense of calm and cool and collectiveness in a time of panic. At least you're not panicking over process; you're panicking over things that are a little bit more important than something like process. I think this is hugely valuable. Director Communications, Municipality*

*I think with the economy changing we've seen a lot of clients take on younger staff with great responsibility and they have no mentors, no years of experience and they are handling very tough situations. I think something like this at least gives them somewhere to start from or to have those discussions with somebody without them saying oh yeah, I know how to handle a crisis or whatever, some sort of disclosure. I can at least understand where I should start and sound like I know what I'm doing. VP PR Agency (1)*

*I think this is excellent for a number of reasons. It's tangible and I find a number of organizations unless they're high profile like healthcare and law; they're controversial in some way, they don't see the value in a crisis communication plan. I think that this could be presented to almost defend your case to take time to write one to see these steps. This is everything that we need to think about. Communications Advisor*

*As I mentioned it speaks very much to me in my day to day life of course in communication or even just issue management. It doesn't have to be a crisis. It can just be an issue that...it may even seem more of an issue to you as an organization then it does to the community that you serve, whatever community that may be but I think it is very practical as long as people aren't as rigid maybe as I am in my line...okay, when I see a process I want to write down every step of the process and comply by it. Manager Communications, Police*

## 6.0 OTHER THEMES RAISED IN THE FOCUS GROUPS

In this section, themes that surfaced in the focus group sessions but did not relate directly to changes in the model are discussed. Many of the topics raised here have relevance to the four research questions for this thesis. This section provides data from the participants that address balancing the interests of organizations and publics, organizational culture, codes of ethics, and finally the role of the communicator in disclosures.

### 6.1 Balancing Needs of the Organization and Public

This section relates directly to the fourth research question in this thesis: *when involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?* This theme was mentioned among the interviewees and was presented in Chapter IV (pp. 179-183).

When asked about balancing the needs of stakeholders for information and the organization's ability to provide it, two participants shared their thoughts on advocacy and on the expectations among the public for information. The thoughts of the Director in the quote below about being a 'devil's advocate' are similar to participants in the first phase of the research who commented on being advocates and 'driving the recommendation' to release information (Table 37, p. 179).

**Table 74 'Balancing' Focus Group Data (295)**

*I think absolutely, Craig. I think that's often where the value of a communicator comes in is being able then to articulate to the management group or whomever your peers are or whomever you report to the need to play a little bit of a Devil's Advocate, to play reporter with them to say look if we don't disclose this, here are the ramifications that could come to light later. Then you have another communication that's much greater than the one you're currently facing. That as I think we've discussed here already, being upfront, being proactive, coming clean if you will, disclosing whatever it is that has people worried is really nothing compared to what will happen should you not disclose so I think it's incumbent upon the communicator to persuade, convince, by argument or whatever the importance of doing so. Director Communications, Mass Transit*

In this second quote below, the Director of Communications for a Municipality shared some of his frustration about how the general public may be unreasonable in their expectations of the organization for receiving communications about a situation. In the first phase of research, the participants were asked whether they thought an organization can communicate too much

information and the sentiment was that it is possible for companies to share too much detail that people may not need. One interviewee mentioned that the students at her university had a 'sense of entitlement' to information (Table 25, p. 156). The focus group participant quoted below would likely agree with her.

**Table 75 'Balancing' Focus Group Data (296)**

*Yeah, I mean sometimes the public's expectations for information and disclosure far outpace the speed of decision making and the availability of options right? So...like the blackout...so 2:00 o'clock in the morning Hydro calls, Kev it's going to be a while, it's cold outside, you might want to do something. Okay, thanks. So the public thinks that there are people who will come to every door, knock on it, say how are you doing? Here's a candle or a match...Director of Communications, Municipality*

When asked about whether or not communicators can sometimes find themselves 'caught in the middle' in trying to manage the interests of the organization and publics when managing the communication of a disclosure, the Manager of Communications for the Police said she felt she had to be an advocate for both the employees of the organization and for members of the community. She mentioned that she finds it 'heartbreaking' as a communicator to have a focus on stakeholders such as the media over the employees of her organization.

**Table 76 'Balancing' Focus Group Data (296)**

*I have to be the advocate for the community or an advocate for employees in particular. Yeah, we place so much emphasis on "the media" and not on our employees. I actually find it heartbreaking. I am an employee communications advocate I guess is the only way I can say it. I think we've missed the boat so many times in the run of the day with our employees because they're citizens too. I definitely feel sometimes I'm caught in the middle and I always feel that my thinking was right, not because I'm right but because I want to do the right thing and I think that in a lot of cases it is the right thing to tell the community what's happened.... In some cases it's very self serving....it's all about the organization, it's not necessarily about the community or engaging the community but in some cases it's just we're going to look bad and we need to get out ahead of this. Those are I think easier to sell than the community has a right to know. I'm trying to think of an example where I really had to I say fight. That's a pretty powerful word; that you have to fight for what's right, fight to get the information out there. Manager Communications, Police*

In the fourth focus group, two of the participants commented (Table 77 below) on the role of the communicator in situations where they may be 'caught in the middle' but not necessarily between the public and the organization but internally, between what they think should be done and what their leadership teams think should happen. In the first quote below, Matheson mentioned that communicators may find internal hurdles to disclosure such as a company policy or as he mentioned a 'code of ethics' that may prevent the organization from being open about an issue (such as respecting the privacy of its clients). He also commented that practitioners could encounter internal resistance to disclosure from those who are responsible for the situation. This point is echoed in the



second quote when David MacNaughton said that those who have to make a decision about the disclosure could be those who are responsible for it happening in the first place and this can create internal tension that can influence decisions-making.

**Table 77 'Balancing' Focus Group Data (297)**

*I think organizations are pretty good about understanding their obligation to directly affected persons and for the general public. I think they think about them in equal measure. We're thinking about the company. I think that sometimes you get into internal difficulties where you're cross pressured by saying an internal code of ethics that says you can't comment on the specifics of the case so you can't defend yourself but on the other hand you can't tell what you need to say but you have to disclose that something went wrong or the person that did it gets the benefit of some protection from you as does your obligation. The challenge is – it's almost always the right answer for the corporation to disclose. It is frequently not in the best interest of the people in the organization who made a mistake. John Matheson*

*Yeah. So what you got is you have people around the table who made the decision who caused the problem who are friends with or whatever that is and while the overall organization is better off having it, there are certainly some people within the organization who are not right. That's where it creates tension. David MacNaughton*

A communicator will have to be aware of the internal tension that may exist in a disclosure situation and be aware of how to navigate it by building consensus with other leaders in the organization to support disclosure. In addition to being conscious of the different personalities in an organization and how this could impact disclosure, it is a likely a good idea for the communicator to be cognizant of the organization's culture and how it responds to disclosure situations. The issue of organizational culture is discussed next.

## **6.2 Organizational Culture and its Impact on Disclosure Communication**

Organizational culture and disclosure were discussed in the Literature Review (Chapter II, pp. 45-58) and in the data presented from the interviews in the first part of this research (Chapter IV, pp. 158-169). The influence an organization's culture has on disclosure is related to the second research question in this thesis: *How does the organization's culture affect both its willingness to communicate and use of specific methods or strategies to disclose information?*

There were a number of opinions expressed about organizational culture and its impact on disclosure decision-making that were similar between the interviewees and the focus group participants. For example, the focus group participants quoted below mentioned the influence their CEO and leaders have on the decision making around disclosures. These ideas were also shared in the feedback interviewees provided (Table 30, p. 167).

**Table 79 'Culture' Focus Group Data (298)**

*I think a lot of it comes down to the CEO and how willing they are to talk about things or not. I mean it doesn't matter how much evidence you've got, how much...you know you go through these lists and recommend a strategy to them. If it's somebody who is not comfortable going out there, doesn't want to, then you can advise, you can bring the research but until something has gone wrong and they see the error of their ways, they may not agree regardless of whether you think it's the right thing to do and whether you've got all the research to back you up. Manager, Communications, Financial Services*

*That's what I was going to say. What if there is a misfit? How can this play into if you do have an organizational culture or senior level executives who don't believe in going out with information and you have a situation that really must be disclosed? Manager Communications, National Charity*

In Focus Group B, a lively discussion ensued (Table 80 below) when they were asked what role an organization's culture plays in how it might manage a disclosure. Participants discussed national differences, pressure on the communications department to reflect the organization's culture in how a disclosure is managed, the impact of open versus secretive cultures on an organization, whether or not a communicator can influence organizational culture, and they mentioned the role the CEO may play in defining organizational culture.

**Table 80 'Culture' Focus Group Data (299)**

*I think it's huge. We have a client, they're all from Korea, very different, very different. There's a distinct pecking order of who is going to tell who ...you know people pay if it doesn't conform to that but here in Canada it's totally different so how they see different audiences. I mean they view the media much higher than they would other audiences. If someone's microwave blows up, they'd go to the journalist before they'd go and check out this person's blown up microwave; so really trying to communicate to them that that's not okay. You have to communicate in a different format and it's a struggle. VP, PR Agency (2)*

*Well, I think that culture plays an important part for the communicator personally...whether that person is fearless in speaking the truth or not and the quality of the message and the strategy is all based on whether or not there's an open and safe environment to truth speak. VP Communications, Non-Profit Organization*

*Yeah. That is a culture thing and it is...well, let's just say it becomes...when you have to approach it in whatever it is because the organization is putting that pressure on the communication staff to tell the story in a certain way. That is a culture thing and I have experienced a very radical shift from one sort of extreme to the other and it is...I think at that point your placement is immoral. I felt conflicted. I know this is wrong, this is not the way it's going to work and then to be...yeah, it's a fit thing. You can either do that or you can't ...Director Communications, Provincial Government*

*I think for me it can be so many areas of how you disclose, when you disclose, how you're going to work with all your partners, your employees, everything like that. It's just impacted. I feel like you know cultures that aren't very forthcoming, they pay for it and struggle. VP, PR Agency (2)*

*If the leadership of the organization is secretive, then that'll translate right down the line and people will think that that culture of holding information is okay and those people not sharing information with each other on business matters – they should be. Director Communications, Municipality*

*I'm convinced it's very much an extension of the CEO, leadership, you know whoever...this is my own personal view, I don't know about any research in the field but it sort of permeates down. Their approach to their integrity, their beliefs, all that is...it trickles down and I think in a smaller organization it's more pronounced. There is sort of this philosophy on the open versus command and control...all of that...it's CEO dictated. That's what my experience is. Director Communications, Provincial Government*

*Yeah, that's a tricky one for me. I mean I agree I think the leader of the organization sets the tone. We're going through a culture shift at the XXX right now, primarily focussed on safety, workplace safety and that leadership needs to come from the senior management team which I sit on but it's not mine, it's the organization's but primarily it comes from my boss. My role is to help communicate it, of course, to show leadership where I can. I find it really kind of tricky. I can have an influence on my maybe immediate colleagues, people who work for me or who I work with but I don't know if that's a communicator's role to change the culture as much as it is to support the change with sound communication. Obviously buy into it and do all those things that you should do as a leader. Director Communications, Mass Transit*

When the focus group below was asked about the impact an organization's culture may have on disclosure, one participant started the conversation by saying it was 'Huge' (see below). This was echoed in a comment that a member of Focus Group B said when asked to describe the impact culture has on disclosure (VP PR Agency quoted above). When asked to explain what she meant, she said the culture of an organization impacts the role that any department plays in an organization. Another participant said culture has to do with the tone the leader of the organization sets. In her case, she said the Chief of Police sets the tone for the organization by his actions.

**Table 81 'Culture' Focus Group C (300)**

Communication Advisor (CA): *Huge.*

Manager Communications Police (MCP): *I think it has to do with the Chief.*

Associate Professor: *I agree. It's all about leadership. I don't know if it's culture so much as it is leadership.*

CA: *But doesn't leadership affect the culture?*

MCP: *It does.*

CA: *Where does the culture come from?*

MCP: *If it can...it's interesting because my boss is very much externally focussed. He places all his emphasis on politicians, media and very much on some employees. It's a great point of discussion for he and I.*

CA: *Because I think that the culture of an organization affects the role that any department plays, be it communications, be it finance, be it legal – whatever, HR. The culture of the organization will affect how important your role is. So if the culture of the place where I work really embraces being proactive and being open versus conservative. We have to keep the doors closed, we can't leak anything out, we have to be very...I think just alone just those two different types of culture will change where the communications function or where any function is within an organization. If the culture is open to communications, then that's going to change how you're able to operate.*

*So I think that it's very, very important and I also think it's important what kind of relationship you have with your boss or your director or your chief or whatever it may be...the access you have to them can make a huge amount of difference to how something is communicated externally or internally.*

In the two comments below from participants of Focus Group D (Table 82), Leslie Noble questioned privacy and public safety and whether or not an organization that is committed to discretion should have the right to remain silent if it would be in the public interest to provide the information. In the second quote, MacNaughton mentioned a case where the Hospital for Sick Children in Toronto, made a decision to break one of its policies (which is actually law) to ensure public confidence was not lost in the ability of the hospital to provide care. In Canada, patients can make outlandish public statements about their care in a hospital but the institution is prohibited from refuting any of the claims due to the patient's right to privacy. In the case below, the hospital decided to break this law and clarify erroneous and slanderous allegations regarding the care of a critically-ill newborn.

**Table 82 'Culture' Focus Group Data (300)**

*Swiss banks are notorious defenders of their client's privacy yet in this day and age Swiss banks have been the conduit for a lot of money for terrorists so they decide you know what are we going to disclose here? If somebody in the intelligence community identifies this, are they going to go down fighting for their company ethical policy about privacy or are they going to disclose that this guy is here, shut it down and have full disclosure? I mean that's in conflict with how they get their clients. Leslie Noble*

*Can I just get back to this whole business of culture – culture of the organization? If I look at hospital crisis or controversy, look at the one that happened at Sick Kids where the father was...and a doctor was saying I can't say anything at all about the condition of the child so I mean the basic predisposition of the physicians is we have patient confidentiality, we can't say anything, they were getting slammed, the reputation was getting damaged by a parent who is going ballistic. I mean it was an interesting...it really did come to a whole cultural thing. There's a thing where you know disclosure would have helped the organization but it would have betrayed one of the values of the organization so I mean it's an important issue, you really do need to understand what your culture is and how to get it resolved. David MacNaughton*

Similarities between the interviewees and the focus group participants in their thoughts about culture and disclosure was interesting. Despite working in different fields, the respondents from both stages of research had consistency in their responses and there seemed to be a strong theme emerge that culture plays an important role in determining how organizations respond to disclosure situations. These data are discussed in more detail in the Conclusion of this thesis (Chapter VIII, pp. 313-315).

### 6.3 Codes of Ethics

As mentioned in the Literature Review (Chapter II, p. 59) Schwartz (2002) defined a code of ethics as 'a written, distinct, formal document which consists of moral and ethical standards which help guide employee or corporate behaviour' (p. 28). In this section, the feedback on codes of ethics was mixed. As is demonstrated in the quotes below, some felt they were helpful in guiding decision-making, while others did not see the value in having them, especially if the organization does not practice what it writes in its code.

The Communications Manager quoted below (Table 83) said she has never read the International Association of Business Communicators code of ethics and that she prefers to use her 'instinct' in these situations, which is somewhat similar to feedback from some of the interviewees when they discussed ethical decision making (Table 11, p. 129).

**Table 83 'Codes' Focus Group Data (301)**

*I know there's an IABC one but it's not something that I would ever look at when I was making these decisions frankly. I've never read it I guess it would be a good starting point. I guess I just go based on instinct and experience in my own codes which frankly are different then other people for sure. You know everyone has got a different code but I don't know any...I guess it's because I don't know any executives who would ever say well that's...they might say that's in our code of conduct or not so that's one I guess that I would look at especially if it was an employee related situation. What does the employee code of conduct say on that but I can't think of any others that I've ever referred to in making decisions.*  
Manager, Communications, Financial Services

Participants were asked about the use of codes of ethics in disclosure situations and in their roles and the comments below suggested that they do not refer to them often. These comments are consistent with the Brinkmann and Ims (2003) notion that prejudice towards codes arises from skepticism towards rules and regulations: good or virtuous people do not necessarily need a code, while bad people tend to twist codes rather than follow them loyally (Brinkmann & Ims, 2003, p. 267).

**Table 84 'Codes' Focus Group Data (302)**

*No. I don't even know if we have a code of ethics. I know police officers have a code of conduct and they have...they read something out when they get sworn in, I can't recall the name of it. But they have to abide it but it's not organizational, it's individual yet it's collective. It's a collective police body but no I've never seen a code of ethics. Manager Communications, Police*

*Well, have you ever looked at them? I had them...could you be any more ambiguous? Could you be any more open to individual interpretation? They're...I don't know...to me they are a perfect example of a bunch of very smart people who have lived this life, getting together, 12 of them in a room and writing the code of ethics for a whole bunch of professionals who they have to deal with. Associate Professor*

*I wonder if you end up going by codes of ethics of the industry that you're in. If you're in healthcare, you end up following somebody's code of ethics. It's not going to be PR's; it's going to be somebody else's. Engineering...they have a very strict code of ethics. Communications Advisor*

*I have a much more cynical attitude about missions, vision and values. I sat in a room and they were dictated to a group of employees and no employee buy-in, no discussion, no dialogue, absolutely nothing...just dictated by a dictator in a paramilitary organization and I'd rather communicate with the community so I'm very cynical when it comes to mission, vision and values and I guess we tend to subscribe to what is right and what is just. Manager Communications, Police*

In the third comment above, the Communications Advisor makes an interesting point about practitioners following the code of ethics that apply to the industry or sector of employment. This could suggest that in some respects, communicators may need to be a sort of 'chameleon' that can adapt to the culture of its surroundings. The conversation below (Table 85) between two members of Focus Group D, mentioned that a communicator should be aware of the organization's culture and be conversant in the code of ethics and to use it as an aid in decision-making. However, as was demonstrated in the hospital example above, the interpretation of a code of ethics may be dependent on the circumstances but a written code could at least provide a starting point for a discussion about ethical decision-making.

**Table 85 'Codes' Focus Group Data (302)**

*David MacNaughton (DM): It's going to be hard to get an answer as some issue has some basic baseline information on which you answer the question so take Leslie's example – you know if you're a Swiss bank, the level of disclosure that might be expected and therefore might affect your reputation is minimal. I mean they would think that a certain amount of disclosure on their part would be surprising and oh, maybe they're changing as opposed to a hospital which has a different standard of disclosure.*

*Leslie Noble: Than of a Swiss bank [Laughs]?*

*DM: Precisely...you almost need...and so do you have a Code of Ethics? Well, it would be helpful if you did because it would make some of these questions a lot easier. If you know what your values are as an organization and your culture; you can't write down this is our culture. There is a common understanding of the culture...there is something you can measure those questions against. Some of them...you know if you have five people in your organization around the table, they may all have a different view of what the corporate culture is, what the reputation is, whatever it is against those department managers.*

Two more of the participants in Focus Group D offered their opinion about codes of ethics (Table 86) and Matheson commented that they were 'secondary' to the laws of the land to disclose information to prevent harm. He also mentioned that as a, 'self-regulated profession' communicators should

have a code of ethics to provide guidance for their actions. Noble agreed that organizations have codes they can use to help them through decision-making.

**Table 86 'Codes' Focus Group Data (303)**

Moderator: *What role do you think Codes of Ethics play in these types of decisions be they organizational or professional?*

John Matheson: *Well, they're secondary. I mean I think your duty to a third party is a duty that's at law whether you recognize it in your Code of Ethics or not. But if you don't have a duty to a third party at all, then your Code of Ethics can sit. You can't hide behind it. If your Code of Ethics doesn't say you must disclose but you've got a duty to a third party arising from harm or something like that would tell you that your Code of Ethics should be revised, not that you're appropriate in not acting. But if there is no law, then the Code matters all along and part of being a self regulated profession is having a Code of Ethics. John Matheson*

Leslie Noble: *So lots of organizations have Codes of Ethics in order to help them through management situations.*

Based on these data, it is not clear what role codes of ethics play in decision-making with respect to disclosures. Some of the participants mentioned that they would refer to them and organizations should have them to act as a guide for these situations and other participants said basically that they would prefer to work through ethical issues as they arise based on their own instincts and those of their colleagues. In the next section, the feedback from focus group participants on the role of the communicator in disclosure situations is explored in more detail.

#### **6.4 Role of the Communicator in Disclosures**

This section is related directly to the third research question in this thesis: *what is the optimal level of involvement if public relations practitioners in determining how an organization should disclose information publicly?* Several of the comments discussed in this section were quite similar to the feedback the interviewees provided for the first step of this research. For example, participants mentioned that the communicator should provide a sense of 'calm' when dealing with difficult disclosure situations (Table 34, p. 176).

**Table 87 'Role' Focus Group Data (303)**

*Yeah, sometimes it's an important decision just to calm down and make the decision to gather more information, especially if there's no immediate harm. Director, Communications, Corporate Consultancy*

*The voice of reason I guess. VP, PR Agency (1)*

*It's up to the communicator to be the calm one and that's what is the hard part if you're managing up and down but that's the crucial role. Vice President Communications, Corporate Consulting*

*If you present a calm and cool approach, it's not a big deal but here's the information – sometimes that goes just as far managing it as having all the information and everything at your fingertips. Leslie Noble*

Focus Group B offered a number of suggestions for the optimal role of communicators in disclosure situations (Table 88 below) such as providing their management teams or clients with options of how to manage the communications of a situation as well as being the person to suggest the organization offer some empathy or sympathy for those whom the situation impacted most. Another theme that emerged is the concept of communicators being 'brought to the table' for advice in these situations and playing at the same level as the lawyer or accountant.

**Table 88 'Role' Focus Group Data (304)**

*Oh, I think the discussion has to happen before and I think the role of the communicator is really about painting or drawing these scenarios I see before something happens. Having those conversations – what will we do? What is the absolute worst thing that could possibly happen to us? What will we do when it does because it will happen because we are humans and we make mistakes and that is a fact we all have to unfortunately live with so I think the role of the communicator is to point these out and to have these conversations. Director Communications, Provincial Government.*

*Yeah, I guess that goes to my point about being the one who calls "bull shit" and makes sure that everything is credible; does it pass your own "sniff" test as someone who would be using your product or your service or whatever. VP Communications, Non-Profit Organization*

*You want to show them what your options are. I mean if you're going to go down this road, this might be the outcome. If you go down this road, this might be the outcome but let's discuss what you can live with. VP PR Agency (2)*

*I mean often those who are accountable so in my organization there's a lot of engineers at the senior table and they have trouble seeing the forest for the trees so often I'll just sit back and listen then you're able to come back to them and you're able to inject those things that they forget about like empathy and all that kind of messaging that they don't think about. Director Communications, Mass Transit*

*I think more and more, at least I have found over the years, that communicators are being brought to the table – saying okay, this is what legal says, these are all the different people, this is what they're saying so what do you think? What do you recommend we say? I'm finding that more in the last five years than ever before. VP PR Agency (1)*

*That's a very good point. I mean I think communications struggled over the years to get to the table. I just started at the XXX a year and half ago, I'm at the table, I know Kevin at the City is at the table, I mean these are...it's a credit to the discipline or the profession if you will that they are seen as valuable and invaluable resources, as much as legal is, as much as the finance guy is. They need to have a communication person as well. Director Communications, Mass Transit*

Members of Focus Group D offered similar comments about the importance of having communicators at the decision-making table and offering advice about how the organization should be positioned and how the communicator can act as a 'filter' for the information that is flowing around the issue. The communicator can sort out what needs to be discussed and possibly what may not be relevant to the situation. This is similar to the roles that were mentioned in the Literature Review (Chapter II, p. 85). Hofstede (1980, p. 39) mentioned that there is a need for a role to challenge the values of the organization and be involved in environmental scanning. Aldrich and Herker (1977) and Leifer and Delbecq (1978) referred to this role as a 'boundary spanner'. Leifer and Delbecq (1978) wrote that the boundary spanner must somehow reduce the stimuli emerging from technical,



economic, demographic, and cultural conditions – the macro environment – to information relevant for the organization's goal attainment (p. 44).

**Table 89 'Role' Focus Group Data (305)**

*Having this be successful is actually following the steps which is the incident occurs, you bring your lawyer and your financial guy in the room, you spend days talking about all the things you can't say and unless you have...unless your communications advisor is viewed as being part and parcel of the strategic management team, it doesn't work because every lawyer and every finance guy believes that they are in communications and so this illustrates very clearly that they are part of the team. David MacNaughton*

*Strategic advisor and I'm going to say she's leading the process not following the process. You know obviously there are lots of data points that need to be input into it. There are financial requirements, there are PR requirements but at the end of the day if their primary interest is managing the issue, then the person whose the expert at managing issues leads the process, not people who are expert at the legal ramifications or what have you. Leslie Noble*

*I think that the role that communications provides the filter on when do you have enough information to be able to go forward and disclose. Katie Telford*

*It's kind of a game of paper, scissors and rock that goes on between lawyers, communicators and whoever the other is – like whether it's a financial person if it's a company or an operational person if it's a manufacturing thing or environmental person but if you think about it, the strength of lawyers is saying there might be risk here and that is what they are strongest at doing. The strength of communicators is saying "I think I can get you out of this if you do these things". John Matheson*

Communicators may be able to play the role of the 'boundary spanner' on the decision-making team that is developing the strategy to manage the disclosure. This role, in addition to advising on messaging and communication strategy, seems to summarize the feedback from those who commented on the optimal function of a communicator in disclosure situations. It would be interesting in future research to take these data and compare them to the perceptions of organizational leaders to determine how they see the role of the communicator in making decisions about disclosures. Any discrepancies that were revealed between what the practitioner thinks of their role and the perception of senior leaders of the role of communicators could provide a roadmap for closing any gaps.

## **7.0 GENERAL OBSERVATIONS**

This chapter presented data from four focus groups that were used to further validate the model and provide evidence related to the research questions for this thesis. There appeared to be some similarity in responses and themes between the first stage of the research, the 22 interviews, and the second part, the four groups. What was most interesting in comparing the data between the first stage and among the various focus groups was the level of consistency in the data and in some cases there were a couple of examples where the practitioners had mentioned wanting to achieve

the same goal but for different reasons. The first was the notion of releasing all of the information about the disclosure as soon as possible to 'get ahead of the story'. When this was mentioned in the interviews, the comment seemed to relate to the concept of trying to 'control' the release of the story from the organization to the public before it could be leaked. In Focus Group B (Table 58, p. 270), two of the participants commented that this should be done more out of efficiency than an effort to maintain control. Meaning that by releasing all of the information, the organization would do it all at once and then move on to the next issue.

When the issue of communicating internally prior to public release of the disclosure information was raised, some of the interviewees and a member of Focus Group C mentioned this as a courtesy while a couple of members of Focus Group D suggested this should be done to ensure consistency and discipline in the messaging (Table 69, .p 289). This also was demonstrated in the suggestion of using partners to help with the disclosure situation. The suggestion was made in Focus Group C as a method of reaching audiences and shaping the message. A member of Focus Group D however, commented that the use of partners is helpful to 'spin' the organization into positive territory (Table 65, p. 283). It was fascinating to see how a concept can be interpreted in such a different manner depending on the practitioner's point-of-view and experience. The Focus Groups uncovered different perceptions about each step of the model although more research is needed to determine how the model may be relevant in different organizations, cultures, and with communicators who have varying degrees of experience. In the next chapter, the Conclusion of the thesis is provided which includes discussion of the research questions and thoughts on future opportunities for research.

## VIII. CONCLUSION

In this chapter, the four research questions that were proposed at outset of this thesis are discussed first and then the second part of this chapter will address the implications this thesis makes to public relations practice and knowledge.

Through this thesis, a new and innovative contribution to the field of public relations has been made in the clarification of decision-making around organizational disclosures and the role communicators play in these sometimes difficult situations. The model presented in this thesis builds on public relations frameworks such as RACE (Marston, 1963), RAISE (Kendall, 1992) and ROPE (Hendrix, 1995) and stretches the planning paradigm to include new elements such as an ethical decision-tree that provides insight into the decision-making that takes place in disclosure situations. The model developed in this thesis is specific to disclosure situations, unlike the generic frameworks mentioned above, and may help practitioners and their organizations make decisions such as whether or not to disclose, what information to provide, and who is most appropriate to deliver the messages.

This model may take some of the 'guess-work' out of decision-making or reliance on intuition to manage disclosures (see Table 9, p. 126). The model may be a tool to assist practitioners to collaborate with their organizational colleagues on disclosure planning by walking them through the steps in the schematic. This participative approach to building a strategy may also help improve the level of understanding of disclosure communication planning among other members of an organization.

As mentioned in the Introduction (p. 13) there were four research questions posed for this thesis:

1. What types of organizational situations or events merit public disclosures in the minds of communication practitioners and how are these communicated?

2. How does the organization's culture affect both its willingness to communicate and use specific methods or strategies to disclose information publicly?
3. What is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?
4. When involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?

These research questions are reflected upon sequentially in the next four sections of this chapter and the final section addresses implication of the thesis on public relations practice and knowledge.

**1.0 DISCUSSION OF RESEARCH QUESTION ONE: *What types of organizational situations or events merit public disclosures in the minds of public relations practitioners and how are these communicated?***

For the first part of this question, it was important to understand what events merit disclosures in the *minds* of public relations practitioners to ensure the model developed was relevant to their experience. The aim of the thesis was to develop a model that would assist public relations practitioners to work with their organizations to make decisions about disclosures. If the model did not address what the perception of disclosure was among practitioners, it would risk lacking relevance among communicators.

In the Data Analysis (Chapter IV, p. 129-131), a theme relevant to this question that appeared in the first stage of the research was similar to that of the 'golden rule'. L'Etang (2006, p. 406) described the 'golden rule' as being consistent with the deontological moral framework which is defined as goodness being intrinsic to an act within the context of a relationship. When trying to determine what information would be relevant for an organization to disclose, a few of the interviewees believed they

would communicate anything they felt they would want to know if they were in the place of their stakeholders. For example, an interviewee suggested she would use her sense of what she would want to hear to 'push the envelope a little' against what the legal department might recommend (Table 23, p. 153) and another mentioned she would, 'walk in the steps of those who have been impacted' (Table 16, p. 143). Participants in the focus groups did not suggest the golden rule *per se* when asked about what should be disclosed but some of them commented on the notion of harm or a threat to the safety of anyone who the situation may have impacted. For example, John Matheson from Focus Group D, said that he would consider the 'threshold of importance' for disclosing information to be a threat to the 'health and welfare' of those who could be affected.

Beyond the threat of harm to the public and risk to the organization, there were no specific answers provided about what should be disclosed from an organization to its public. No one for example said that a company should be disclosing its 'green initiatives' but the lack of specificity in the subject matter is actually a positive outcome. Following a fairly simple rule of something akin to, 'communicate to people what you would like to know,' might be one way for practitioners and organizations to determine the information to provide in disclosure situations. An otherwise reasonable person may find this to be an effective method of deciding what should be disclosed from the organization to the public. This approach may be overly reliant on the deontological framework and it was mentioned earlier in the thesis (Chapter II, p. 64) the use of one moral framework may not be the only approach to every situation. There were traces of other moral frameworks in the data such as virtue theory, where an interviewee mentioned she would do what she felt was right first and foremost (see Table 11, p. 129). However, to clarify this question in practice, a helpful step in the model, which may confirm the 'hunches' of practitioners or others in the organization about what should be disclosed, could be the 'validation' step. In this step, people are prompted to gain an outside opinion about the situation, to ensure the level of information and content is sufficient to meet the needs of various publics.

An opportunity for future research for this part of question one might be to examine what the threshold of information may be that practitioners would deem as appropriate to release and contrast that with how their colleagues in the organization might perceive the level of transparency that should be provided. It would also be interesting to see how the points-of-view of practitioners and their organizational colleagues compare or differ with members of various stakeholder groups such as those who are accountable, directly affected and potentially 'broader' publics.

Asking the second part of the research question, *how are disclosures communicated*, was not intended to determine the tactical approach to the disclosure (face-to-face meetings, use of websites, news releases, etc.) but more importantly, the question was posed to understand how these sometimes difficult decisions are made. Questions such as what is researched to develop the strategy, how timely should the disclosure be, and how are audiences identified and segmented, were asked to see if a theme would surface. A significant amount of data emerged in response to these questions and the answers provided the necessary information to build part of the third or 'orange' section of the model as well as the 'stakeholder disclosure pyramid'.

To guide the strategy decision of determining 'how' the disclosure should be communicated, data were provided in the first phase of the research about gathering information and looking for precedent setting cases that the organization may want to emulate or avoid (Table 3, p. 118). This theme was validated in the second phase of the research when focus group participants mentioned they would perform a similar step to ensure they had ample background on the situation that would act as a guide to strategy development (e.g. Table 50, p. 261). In addition to gathering information the timeliness of the disclosure was seen as an important issue in the feedback. Some people mentioned being 'proactive' with an issue to release the information as soon as possible. Among those who mentioned this in the one-one-one interviews, the concept of being proactive was related to maintaining a sense of control over the issue, which may not be realistic given that once the information is communicated people are free to interpret it in whatever manner they choose (see Table 12, p. 134). In the focus groups, the concept of being proactive was mentioned (Table 58, p.

270) as the most efficient way to deal with the issue. Their sentiment was to get information out quickly, 'like ripping a band-aid off...get it out of the way.' In fact one of the participants mentioned that the less information his organization disclosed the more work it created for him. His preference was to deal with the issue quickly and in the most efficient way possible to manage workload and to get the issue out of the way so they could move on to whatever was next.

To ensure the disclosure communication strategy was sensitive to both the needs of the organization to manage the situation and the ability of stakeholders to understand the event, practitioners made a concerted effort to stage the roll-out of communication by segmenting audiences (Tables 14, p. 138, and 15, p. 141). This advice led to the development of the 'stakeholder disclosure pyramid' which will help prioritize audiences and make certain there is some sequential notification to ensure there are informed constituencies created in the upper portions of the diagram to support those in the lower levels who need the information. There was support for this approach from Focus Group C (see Tables 61, p. 275, and 62, p. 276), with a minor change to the wording and an emphasis on the importance of partnerships.

With respect to developing and delivering messaging, the participants in the interviews shared their thoughts on messaging and some of constraints they encountered when crafting what the organization would share about the situation. Similar to the responses about what communicators would disclose, some of the interviewees mentioned they would be guided by what they would want to hear if they were the recipient of the information (Table 16, p. 143, Table 17, p. 144). This led to some challenges internally with the legal department (Table 23, p. 153) where respondents mentioned trying to find common ground to ensure the messaging was as free of legalese as possible. It was mentioned in one of the focus groups that the messaging should also be consistent with the organization's values (Table 70, p. 289). Themes of ensuring the messaging is honest and straight-forward were discussed in the Literature Review (Chapter II, p. 75) where Pratt (2004) provided advice that the value of communication from organizations tended to be downplayed by receivers if they perceived the information to be an outpouring of self-serving good news (p. 19).

Similarly, participants here mentioned that the messaging needed to be factual and in keeping with the values of the organization. There was also discussion of apologizing and the feedback was consistent between the two phases of research (Table 18, p. 145 and Table 51, p. 261). As far as who should convey the messaging, the results in the first part of the research showed three themes that suggested the message should come from the CEO if it was a corporate-wide or serious issue, from the person in the organization who has the closest relationship with the audience, and from an expert if there is a need for specific content (Table 22, p. 150). In the second part of this research, it was mentioned that the CEO should be the spokesperson depending on the severity of the event (Table 52, p. 262).

Once the disclosure communication was provided to audiences, there were also a few comments on how efforts would be evaluated (pp. 244, 264, and 291), which ranged from media monitoring to internal debriefs on strategy and ongoing surveillance as the plan is implemented. Whatever method of evaluation is chosen, it should be sufficient to meet the needs of stakeholders and measure the goals or objectives that are set in the plan.

For the second part of this research question, the data have provided insight into how the disclosure strategy would be developed among the participants and how they would manage the situation. This revealed data for the sequential notification of publics to ensure there were a series of informed stakeholders in place who could help explain the situation for the affected groups. An opportunity for future research with this section may be to examine the effectiveness of the proposed strategy in different organizations and cultures. It may also be worth testing, the merit of the stakeholder disclosure pyramid in a practical setting and comparing it to other segmentation models such as Grunig's (1992) situational theory.



**2.0 DISCUSSION OF RESEARCH QUESTION TWO: *How does the organization's culture affect both its willingness to communicate and use of specific methods or strategies to disclose information publicly?***

In the first stage of the research, the interviewees provided feedback about their organization's commitment to transparency (Table 27, p. 160 and Table 28, p. 162) and shared their frustration about the occasional disconnect between what the organization claims to be committed to and what it actually does. Whether the organization was 'open' or 'closed' in its approach to communication was also mentioned in the interviews as having an influence on how the organization would approach the disclosure. In one instance for example, a person who worked for a pharmaceutical company said her employer was quite risk averse and when it discloses they have a formal 'check-list' in place of people to notify. She was referring to a standard process of notification that has to take place with medication adverse events. Another person who worked in a fairly open 'hippy' university, mentioned that cultures can be too open and to facilitate decision-making 'doors' needed to be closed to allow those in authority to strategize about the situation. A few of the interviewees also mentioned the influence of the CEO and they relayed their experiences in working with leaders who are supportive of communications. In one case in particular, the story was relayed of a hospital CEO who did not consult legal advice about a situation and simply released the information publicly and apologized for an incident which involved the death of a child (Table 30, p. 167).

Many of the same themes from the interviews were shared among the focus groups with respect to culture such as the role of the CEO and open and closed cultures (Tables 79-82, pp. 298-300). There was evidence of an organization breaking its own policy to disclose information such as the Hospital that decided to speak openly about the condition of a critically-ill child to counter untrue public statements. In another example, a Director of Communications for a mass transit system, mentioned the role he played in trying to change his culture to one that adopted a greater enthusiasm for safety (Table 80, p. 299). There was also evidence of witnessing a change in culture from shying away from the public to being more open over time (Table 30, p. 167).

As mentioned in the Literature Review (Chapter II, p. 57), Sriramesh, Grunig and Dozier (1996), wrote that there may be opportunities for communicators to help their organizations change culture and adopt a more open model of information sharing. They suggested that when an organization is misaligned with its environment, performs poorly, and expands rapidly or is divested, the chance arises for communicators to assist in changing culture (Sriramesh, Grunig & Dozier, 1996, p. 241). Similarly, Schein suggested that if any part of the culture is going to change, the system must experience enough disequilibrium to force a coping process that goes beyond reinforcing what is already in place (Schein, 2004, p. 320). A communicator who is motivated to affect a culture change to improve information sharing between an organization and its publics, may want to be aware of shifts in either the environment or organization that could lead to the adoption of a new and potentially more open model of communication. The focus of this research question was to determine the impact culture may have on disclosure but an opportunity for future research may be to explore the impact a communicator may be able to have on evolving an organizational culture to one that is more open to its publics.

Sriramesh mentioned that even though societal and organizational cultures are well researched topics, the reality is that there is much more work that needs to be done to understand the relationship between culture and public relations (Sriramesh, 2007, p. 517). Similarly, there is opportunity to test the disclosure model in this thesis to determine where it might be most effective with respect to open or closed organizational cultures and how the model may be applied to organizations in different cultures around the world. It would be interesting to see which elements of the model are relevant to different cultures. For example, Hofstede (1980) wrote that cultures that have a low tolerance for uncertainty may rely on 'pseudo-control' mechanisms such as planning to reduce anxiety around the unknown (p. 117). The disclosure model may have a high degree of relevance to both corporate and societal cultures that are uncomfortable with uncertainty. It would be interesting to test the effectiveness of the model between those organizations that have a high tolerance for uncertainty (such as the 'hippy' university mentioned in the data) versus those who may not (such as the pharmaceutical company that had a 'check-list' for disclosure).

Data provided for this question have demonstrated the communicators in this research seem to be aware of the impact organizational culture may have on the propensity to disclose information. Practitioners who participated in this research mentioned examples of organizations that are forthcoming with information and those that are less than transparent. Communicators may have an opportunity to play a role in shaping the culture of an organization but there were not enough data provided on this point to draw any significant conclusion. This may be an opportunity for future research. Based on the data presented in this thesis, if the organization is prone to disclosure, it may use any number of strategies and tactics to reach audiences but if there is discomfort among the leadership of the organization about the issue, the communicator may have to play an advocacy role to try to pry the information out of the organization and in to the hands of those who need it. The role of the communicator in disclosures is discussed in the next section. It is important to remember however that these data are qualitative and cannot be at all generalized to a broader population.

### **3.0 DISCUSSION OF RESEARCH QUESTION THREE: *What is the optimal level of involvement of public relations practitioners in determining how an organization should disclose information publicly?***

There were a number of roles the participants mentioned in the data for public relations practitioners to play in disclosures. As was presented in Chapter IV (Tables 31-38, pp. 171-181) the roles mentioned in the first stage of data collection included strategic advisor, stakeholder liaison, calming influence, team leader, advocate, and ethical guardian. Many of the categories that emerged through the interviews in the first stage were mentioned in the second stage of research when the focus group participants were asked what they thought the optimal role of the public relations practitioner should be in disclosure situations (Tables 87-89, pp. 317-318).

Disclosure situations present an important opportunity for communicators to demonstrate the strategic value they bring to the organization. It was mentioned in the data that communicators act as strategic advisors in these situations by 'mapping out' potential scenarios of what could happen

(Table 88, .p 304) and acting as a 'filter' for information coming into the organization that needs to be provided to decision-makers (Table 31, p. 171 and Table 89, p. 305). It was mentioned that communicators are being 'brought to the table' more often than in the past to provide advice (Table 88, p. 304, Table 89, p. 305) to the management teams and in addition to acting as a filter, it was also mentioned that the practitioner can act as a 'stakeholder liaison' (Table 32, p. 172 and Table 61, p. 271) and provide the linkages the organization may need to make with publics to manage the situation. This role was described in the Literature Review (Chapter II, p. 85) as a 'boundary spanner' that came from Aldrich and Herker (1977) who suggested that boundary roles link organizational structure to environmental elements (p. 218). Leifer and Delbecq (1978) argued the importance of boundary spanning is to ensure that information about environmental contingencies needs to reach organizational decision makers to ensure the appropriate decisions relevant to environmental conditions (p. 40). Heath (2001, p.198) refers to this role for practitioners as 'relationship management', which he sees as a value-added function that moves away from spin and publicity to concentrate on forging relationships and alliances with publics.

Somewhat similar to the 'boundary spanner role', Hofstede (1980) mentioned that corporations may need a modern equivalent of the 'medieval king's court jester', a person on the team with direct access to the highest decision makers, whose institutionalized role is to challenge values and be involved in environmental scanning (p. 39). A participant in one of the focus groups mentioned that it was her job to call 'bullshit' to ensure the strategy for example was consistent with the organization (Table 88, p. 304). This function was also described as the practitioner playing an 'advocacy' role for the organization to release information to stakeholders (Table 37, p. 179 and Table 76, p. 296). In some cases, this involved the practitioner challenging the accepted 'norms' in the organization such as the director at the pharmaceutical company who pushed her executives to consider an editorial board with a national newspaper to discuss an issue. She lost her bid to do this but she had the courage to bring it forward. The idea of the practitioner playing an advocacy role is compelling and may be suited to public relations if the person in the position has relationships with stakeholders and has the courage to challenge what is happening in an organization. This function however has an

obvious drawback which of course is that the communicator is usually an employee of the organization and there is likely only so far anyone is allowed to push for a different outcome. Being aware of where the line is drawn on any given decision may be an important piece of advice for communicators to have when advocating for a specific strategy.

Another role a few of the participants mentioned is playing the 'organizational conscience' or 'ethical watchdog' (Table 38, p. 181). In the Literature Review Chapter (p. 78) it was noted that L'Etang (2003) made the critical point that public relations practitioners are not necessarily trained to be organizational ethicists and ceding this responsibility to them is not the best option. In fact, delegating ethical decision-making to one area of the organization and failing to instill a sense of moral obligation among everyone, as Maclagan (1998) suggested, could be met with dire consequences. By having everyone in the organization believe that acting in a morally responsible manner, is the sole concern of someone with a title of 'ethics officer' may abdicate accountability for everyone to act in an appropriate manner.

Based on the data from this research, an optimal role for public relations practitioners to play in disclosure situations could be to provide strategic and tactical communication advice that considers the needs of stakeholders and the organization. The use of this framework may provide practitioners with a schematic to help organize their thoughts and create order out of what can be a chaotic period for an organization. Using the model as a guide could provide communicators the confidence needed to make recommendations to a senior team about how to move forward with a disclosure strategy. From the data in this study, it appeared that the communicator should have access to executive decision-makers and be able to have open discussions with them about how to manage the communication of the situation. Finally, while they may have an opinion about ethics, public relations practitioners are one of many organizational voices on these issues and should be heard among other input from members of the senior team and organization.

**4.0 DISCUSSION OF RESEARCH QUESTION FOUR: *When involved in a disclosure situation, how do public relations practitioners balance meeting the objectives of the organization with the information needs of the affected publics?***

This research question was asked to determine if practitioners found themselves 'caught in the middle' between what the organization wants to do and what the public expects to happen. It was important to understand this to determine if practitioners find themselves stuck between the organizational objectives and demands of the public and how these issues are resolved.

A few of the respondents in the study mentioned there will always be tension between an organization and its publics (Table 13, p. 135). The organization has business objectives to achieve for its survival and these may not always be consistent with the needs of publics. In the first stage of the research, some of the interviewees mentioned that 'tension' exists between an organization and its publics due to the nature of the objectives of the organization (to stay in business) not necessarily meeting the needs of the public. In the Literature Review (Chapter II, p. 87) Holtzhausen argued that the role of public relations practitioners is to identify 'tensors' between the organization and internal and external publics and to create situations in which new meaning is produced (Holtzhausen, 2000, p. 107). Participants in the first stage of the study mentioned there are 'different interests at heart' between an organization and its publics (Table 13, p. 135) and these may be difficult to reconcile but through this tension an opportunity may emerge for the organization and public to dialogue and set a new threshold for the level of detail the organization might consider acceptable to disclose.

Stakeholders may want to achieve a different goal than the organization but they may be able to achieve a similar outcome through application of the mixed motive model for example. As mentioned in the Literature Review (Chapter II, p. 136) Murphy's (1991) 'mixed motives' model (cited in Plowman, Briggs and Huang, 2001, p. 302) provides an opportunity for each side in a stakeholder relationship to retain a strong sense of its own self-interests, yet each is motivated to cooperate in a limited fashion to attain at least some resolution.

A disclosure situation may present an organization with an event that has opportunity for differences of opinion between an organization and its publics such as the demand for information from audiences outweighing the willingness of an organization to provide it. This was mentioned in the first part of the study (Table 25, p. 156) and the second part (Table 75, p. 296). Bridging this divide may not always be possible and one of the obvious reasons for this is the ownership of the information. As one respondent said, the best he could do was lobby the decision makers in the organization on behalf of the public requesting the information but ultimately, it is the corporation's information and the person entrusted with the leadership of the organization has to make the final decision about releasing it (Table 37, p. 179). As mentioned in the discussion of the previous research question, communicators can advocate for the release of information and advise that it is a good strategy to pursue but the decision to provide the information likely does not rest with the practitioner. It may be the role of the CEO, senior leadership team or board of directors to determine what is releasable.

To help shape the expectations of the organization for disclosure and to ensure there is a balance between organization and publics, it may be helpful to ensure the practitioner has a position at the executive table. Without a voice at the decision-making table of the organization, the communicator may have difficulty influencing decisions about the disclosure. It was mentioned in the focus groups that communicators are being brought to the table to provide advice in these situations (Table 88, p. 304 and Table 89, p. 305). If the practitioner is at the decision-making level of an organization, there is an opportunity to influence how the organization carries out its communication plan. Discussions at the planning stage would likely include the extent of the information the organization is willing to provide. The information about stakeholders that the communicator gathered in the early stages of the model could be useful to the executive team and could shape the goals and objectives for the communication strategy.

In the culture and validation and evaluation stages of the disclosure model, there may be a chance for the practitioner to further influence the communication direction of the plan if the strategy is

responding to feedback from audiences. If the organization has a stated commitment in its values for example to be 'transparent' or open and honest or if there is 'ongoing evaluation' being conducted on the plan as it rolls out, then the communicator may be able to point out that to continue adhering to these values and principles of measurement, the company may want to consider changing or adapting its messaging or strategy to the needs of stakeholders. This would have to be done within reason and one of the conversations the executive team and the communicator may want to have prior to implementing the plan is to define their 'threshold of disclosure' and agree on the ground rules of what is acceptable information to provide and where they may draw a figurative line to refuse to provide any further detail. The guideline for a decision like this may come from the organization's stated mission, vision or code of ethics.

Working to achieve a level of transparency between the organization and its publics has been evidenced in the research data but given the qualitative nature of the methodology used in this thesis, the results cannot be generalized to a broad population. Participants in this research commented on the potential for a communicator to play the role of advocate for stakeholders and this is an opportunity for further research. It would be interesting to see if other communicators share this sentiment and if they see themselves as playing an advocacy role in an organization. The relevance to disclosure is to see how the role of a 'stakeholder advocate' would play out in managing a disclosure situation and how the model may be useful to this person. It would also be interesting to see how organizational leaders, other than communicators, would view the role of an advocate and determine what lines they might draw on how far someone in this role can push the decision-makers of an organization to disclose information. By using this model, the public relations person in an organization may be able to highlight the need to be responsive to stakeholders. If the public relations person is able to influence decision-makers then it may be more likely that the disclosure strategy will meet the reasonable needs of publics for information.



## **5.0 IMPLICATIONS**

In this section, the broader implications of this thesis on theory are addressed. The thesis has implications for theorizing about public relations decision-making processes and tools, discourse ethics, transparency and organizational communication (internal and external).

In this thesis, a model has been proposed to assist PR practitioners and others in decision-making about organizational disclosure. No previous model has included this level of detail or has been developed based on practice-expertise. The model takes the 'guess-work' out of disclosing information and it represents an opportunity to complement intuitive decision-making that was a theme in this research. Furthermore the model connects with a number of important theoretical issues, for example, it provides a useful bridge to discourse ethics in that it encourages organizations to work with internal and external stakeholders to share information and tailor it based on the needs of audiences. The model also connects with postmodern critiques of public relations by showing how practitioners have a valuable role to play in challenging the cultural norms of an organization with confidence knowing that the tool they are using has been generated through research.

There is an attempt in the model to provide an ethical framework for decision-making about disclosure issues that considers the needs of the audiences for information to make a rational and informed choice about the situation. In short, this thesis presents a clear framework (ethical decision-tree) and rationale for disclosure, based on solid empirical evidence that can help practitioners formulate ethically grounded strategies and messaging.

Wider implications of the thesis suggest that the public relations practitioner is well-placed to contribute to 'democracy' in organizations with their publics. A more democratic form of corporation is likely to experience much less of a crisis of legitimacy than those closed to potential critics and stakeholder groups (Tombs & Smith, 1995, p. 145). Thus the model developed in this thesis contributes to the excellence paradigm of two-way symmetrical communications and might provide a

tool for practitioners to open their organizations up to the public and make them more available to the needs of stakeholders by engaging in dialogue to make improvements Grunig (1992).

The thesis connects strongly with current themes relating to transparency. The model presented in this thesis shows organizations how to become more transparent with their publics, which as Tombs and Smith (1995) suggested could be beneficial to both the organization and stakeholders. Rawlins (2009, p. 75) wrote that transparency cannot meet the needs of stakeholders unless the organization knows what they want and need to know and the use of this model may encourage organizations to consult with publics to determine the most appropriate level of transparency to satisfy the needs of audiences for information. Furthermore, Coombs and Holladay (2009) wrote that transparency should be viewed as a process driven by constituents and not as an organizational quality. Constituents should define what information they want from organizations and judge the organization's degree of transparency on its ability to meet their information demands (p. 5). They added that the idea of information sharing is deceptive and that just because information is disclosed does not mean it is meaningful and understood by receivers (Coombs & Holladay 2009, p. 6). The model in this thesis helps organizations focus on the information needs of their stakeholders and ensures there is an attempt at two-way symmetrical communication in these situations.

### ***Final Thoughts – towards a new research paradigm***

It was inspiring for me to listen to the stories and opinions of my fellow practitioners to try to apply their knowledge to something that might improve practice. Grounded theory provided me with a methodology to take empirical evidence, derived from those in practice and use it to develop what might be a novel approach to resolving a difficult organizational challenge. However, if grounded theory provides a method of gathering data from practitioners that has the potential to improve the field, why has there not been more of this type of research conducted? In my review of the literature, there was a noticeable lack of grounded theory research in public relations. There were numerous case studies to detail the PR response to a situation and there was survey research to test hypotheses but there was little use of grounded theory. This is curious to me. In a field that has an

abundance of practitioners, there is an opportunity to draw more from their experiences, using valid research methodologies such as grounded theory, to develop evidence-based models to improve practice and potentially, to influence other fields.

One of the challenges in public relations is to encourage others in practice to conduct and participate in research studies. It was at times difficult to find people to participate in this research but those that did seemed engaged and enthusiastic about the topic. I think sharing the results of 'practice-based research' in as many venues as possible and publishing results that are intended to improve the work-lives of those in the field may encourage others to ask questions not only of practice but of existing theory. The dissemination of my thesis research was an essential part of my chosen research strategy (required by grounded theory). I believe this type of research can change academic approaches to examining public relations and has the power to change practice.

This thesis also has implications for other fields such as organizational development and management. For example, the disclosure model is relevant to aspects of leadership and 'change management'. The thesis mentioned communication ethics issues relevant to those in management and business ethics. Organizational psychologists may be interested in the findings concerning the cultural influence of decision-making and sociologists may wish to extend analyses of social justice theory in relation to stakeholders' equality of access to organizational information.

This thesis has provided a unique and empirically grounded insight into how public relations practitioners and their organizations make communication disclosure decisions. The thesis complements work in transparency and openness in organizations through the provision of a model for practice, which is grounded in practitioner expertise, and married to conceptual analysis.

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## X. APPENDICES

### APPENDIX A

#### Interview List Summer 2007

Title (male or female)	Description of Organization & Province
1. Chief of Communications (F)	Hospital A, Ontario
2. Director of Communications (F)	Pharmaceutical Company A, Ontario
3. Vice President Communications (F)	University, Alberta
4. Vice President Public Relations (F)	Health Authority A, British Columbia
5. Chief of Public Affairs (M)	Hospital B, Ontario
6. Director of Communications (F)	University A, Ontario
7. Vice President Public Affairs and Communications (F)	Hospital C, Ontario
8. Vice President Communications and Marketing (F)	Hospital D, Ontario
9. Chief Communications Officer (F)	University, British Columbia
10. Director of Communications (F)	Non-Governmental Organization (sheltering the homeless), Ontario
11. Director of Communications (F)	Health-based Charity, Nova Scotia
12. Director of Communications (F)	Provincial Government, Nova Scotia
13. Director Communications and Marketing (M)	Corporate (Retail Chain), Ontario
14. Director Public Affairs (M)	University B, Ontario
15. Chief of Communications (M)	Lottery, British Columbia
16. Director Public Affairs and Communications (F)	Lobby Association (Medical Research) Ontario
17. Vice President Public Affairs (F)	University C, Ontario
18. Vice President Corporate Affairs (F)	Insurance Company, Ontario
19. Director Public Relations (M)	Health Authority B, British Columbia
20. Vice President Corporate Affairs (F)	Pharmaceutical Company B, Ontario
21. Chief Communications (F)	Hospital E, Ontario
22. Vice President Communications (M)	Hospital F, Ontario

#### Sample Invite Letter for Potential Study Participants and Discussion Guide

Dear Fellow Communicator,

I am writing to you to see if you would be interested in participating in a research study to develop a public relations theory, which will assist communicators in providing advice to organizations about disclosing information publicly. Making decisions and providing advice about how, when, where and to whom information should be disclosed is intuitive for many communications professionals but

surprisingly, there has been little to no research conducted in this area. Your participation will help create a first-of-its-kind framework for managing disclosures of information from organizations to various publics.

For the purposes of this study, “disclosure” is defined as information that the organization voluntarily communicates publicly such as informing people about minor defects in a product or taking accountability for human error. These situations are not necessarily crises but can become larger issues if they are not communicated and managed properly. The purpose of this research is to build a guide people can use when presented with these situations. This reference tool will help communicators determine what situations or events merit public disclosure, which organizational cultures facilitate communication, what the optimal involvement of public relations practitioners is in the situation, and finally how communications professionals balance the needs of their organizations with the information requirements of various publics affected by the situation.

This study will involve a series of one-on-one interviews with senior-level communications and public relations professionals across Canada. Your participation in this work will amount to reading a brief fictional disclosure scenario (two paragraphs in length) and discussing your thought processes for how you would manage the situation. If you agree to participate, the hypothetical case and a list of 10 questions will be sent to you about 48-hours prior to the interview. The questions are intended to be a discussion guide and they do not all have to be answered. The interview will take less than one-hour. Your responses will be recorded but will remain confidential and may only appear as anonymous quotes in the final write-up.

If you are interested in participating, please let me know via return e-mail and I will follow-up to arrange a time to talk about this topic. This research is being conducted as a component of my doctoral dissertation for a PhD in Public Relations from the Faculty of Film and Media Studies at the University of Stirling in Scotland, United Kingdom. I would like to sincerely thank you for considering taking part in this work.

Sincerely,

Craig DuHamel

### **Discussion Guide**

1. Given the scenario described above, how would you start to form an opinion about what to do? What would you do first? What criteria would you use to assess the situation?
2. Who should know about this situation? How do you prioritize your audiences or publics?
3. How would you formulate messages? What sources would you use? What other factors will affect the creation of your messaging?
4. What methods of communication would you use to inform people about this situation? How do you determine these methods?
5. As the head of communications in this scenario, what is the optimal role for you to play in this situation? When should you have been informed?
6. How would the culture of your organization influence the communication strategy for this situation?
7. How do you determine the information needs of your audiences in these situations? How would balance the information needs of your audience with the organization’s objectives?

8. In your experience, how do you determine whether or not to disclose similar situations (do you have a personal litmus test or gauge to guide your decision-making)?
9. Have you encountered a situation similar to this where you chose not to communicate broadly? If so, what factors led to your decision?
10. What further advice would you provide to your fellow communicators about managing voluntary public disclosure situations?



## APPENDIX B

### Fictional Vignette Disclosure Scenarios

#### Scenario A (Hospital)

As head of the Public Relations Department for a large teaching hospital, you were informed this morning about a medication error that involved about 250 breast cancer patients. Dr. Jane Smith, head of medical oncology for your hospital, has informed you that over the course of one-week, patients were inadvertently provided with a stronger dose of their regular chemotherapy regimen. Apparently, when the medications were dispensed from the hospital pharmacy, one of the pharmaceuticals was labeled incorrectly which caused the nursing staff to administer a more potent dose. The error was finally caught when a pharmacist noticed the incorrect label during a routine inventory control audit that is conducted every seven days.

This error did not have an adverse impact on the therapeutic ability of the medication, but it may have resulted in some patients experiencing intensified side-effects such as nausea and vomiting. Dr. Smith is particularly concerned that one of the patients, a prominent newspaper columnist who has been publicly chronicling her journey with this devastating disease, may write a negative article about this incident which could cause concern among other patients in the hospital. She has asked for your advice about how to disclose this information.

#### Scenario B (Financial Services)

You are the Vice President of Public Relations of a medium-sized retail financial services company that provides a suite of products from personal financial planning and mortgages to retirement savings and investment advice. Your company has a solid reputation for being a trustworthy and integral member of the local business community. Your colleague, the Vice President of Client Relations, has just informed you that sensitive documents, containing personal account information of about 300 clients, was supposed to be shredded but instead was sorted incorrectly into a public recycling bin.

Although the risk is quite small that anyone could access the information contained in these documents, the threat of identity theft is fairly topical and your company has recently been quoted publicly in the business media as having one of the most secure systems to safeguard its clients. Your colleague is obviously concerned about this situation and is asking for your advice about how to best disclose this information.

#### Scenario C (Consumer Products)

You are the Vice President of Public Relations for the largest producer of vitamin supplements and naturopathic herbal remedies in the country. Recently, your organization has enjoyed new found success with one of its products called *Oomph*, which contains a naturally occurring stimulant. *Oomph* is produced in tablets that look like Aspirin and can be purchased in most health food stores. Originally designed and marketed as a natural alternative to Ritalin, for a niche group of adult sufferers of attention deficit disorder, *Oomph* has gained popularity with high school students who believe the pills give them a much needed boost of energy every now and then.

One of the drawbacks of the product is that it can cause high blood pressure and should not be taken if people currently have medical issues such as hypertension or diabetes. If the correct dosage is not followed, an overdose can in some cases lead to cardiac arrest. These warnings are explicitly stated on the packaging and have been disclosed to Health Canada and other regulatory bodies. However, your customer relations department has received about six calls from concerned parents who have had to rush their teenage children to local Emergency Departments. The teenagers in these cases have all experienced shortness of breath and brief spells of irregular heart rhythms following the use of your product but fortunately there have been no reports of serious injuries or fatal outcomes that have been linked to the use of *Oomph*. You, along with your colleagues the VP of Product Development, VP of Marketing, and Corporate Legal Counsel have been called to the CEO's office to develop a plan to manage this situation.

### **Scenario D (Government)**

As the Executive Director of one of the largest provincial government departments, you routinely prepare messaging for the annual presentation your Deputy Minister makes to the legislative public accounts committee to explain how the department is spending public dollars. During the presentation, the Deputy Minister gives a high level summary of various expenditures and provides estimates of what the financial pressures will be for the coming year. This year however, the Department's Chief Purchasing Officer has come to you with some news that could complicate your messaging. She has found some irregularities in how government contracts were awarded to an office supply company. Apparently, if the value of the contract is under a certain amount then a tender does not have to be issued. In this case however, there were a large number of contracts assigned to the office supply company for what appears to be just under the amount required to issue a tender for competitive bids.

Although technically no policy has been broken with the awarding of these contracts, the frequency and consistency of the expenditures that have come in just under the stated limit that would require a competitive tender seems a little odd to you and will most likely appear out of the ordinary to the public accounts committee. There is no specific requirement to highlight this information in the Deputy's presentation to the committee but an inquisitive member of the committee could easily bring this matter to the surface. You have been asked to provide advice to the Deputy Minister and Chief Purchasing Officer about communicating this situation.

### **Scenario E (Academia)**

**i)** You are the vice president of public relations for a university that is situated in a mid-size Canadian city of about 350,000 residents. The university has about 15,000 students and is well-known for its undergraduate and graduate programs. This morning you received word through the grapevine that about four male students from the same residence have presented at the campus walk-in clinic with fevers and have symptoms of nausea and vomiting. You have been told that the physician at the clinic has not confirmed a diagnosis yet but is leaning towards Norwalk, a highly contagious gastrointestinal illness that is not fatal but can be quite unpleasant for those who contract the virus. You have your weekly meeting with the president of the university this morning and it is your job to brief her about the situation and suggest a communication plan.

**ii)** As the director of communications for a small to medium sized Canadian university (10-12,000 students) you are a member of the senior management team and have weekly meetings with this group to discuss operational and strategic issues facing the school. This week, the Dean of the Faculty of Nursing, who happens to be a close personal friend of yours, has come to you with the startling revelation that she has discovered that 11 of her students in the senior class have been caught cheating on their final exams. There are a total of 300 nursing students in the entire faculty and this is not a catastrophic issue but it could impact the credibility of the university and those who are graduating this year (and possibly in future years). The Dean has disclosed this to the VP of Student and Academic Affairs who is a member of your senior management team and she expects it will come up tomorrow as a topic of discussion at your weekly senior management meeting. New nursing grads are a bit of a political issue and the government of the day has made it a priority to hire every new grad and they will be keenly interested in how this issue is managed.

In addition, your friend, the Dean, has heard that the student newspaper has started to snoop around the issue but has not formally asked for comment. The Dean is concerned about the issue becoming more public and has asked you how you will manage this situation and what your communication advice will be to the senior team.

## APPENDIX C

### Codes of Ethics

#### Canadian Public Relations Society Code of Ethics

Members of the Canadian Public Relations Society are pledged to maintain the spirit and ideals of the following stated principles of conduct, and to consider these essential to the practice of public relations.

- **Confidentiality and Privacy Declarations**
- **Conflict of Interest Declaration**
- **CPRS Policy Statement Communications in Social Media**

For more information on the CPRS Code of Ethics, please contact the **Presiding Officer of the Judicial and Ethics Committee**.

#### Code of Professional Standards

1. **A member shall practice public relations according to the highest professional standards.**  
Members shall conduct their professional lives in a manner that does not conflict with the public interest and the dignity of the individual, with respect for the rights of the public as contained in the Constitution of Canada and the Charter of Rights and Freedoms.

2. **A member shall deal fairly and honestly with the communications media and the public.**  
Members shall neither propose nor act to improperly influence the communications media, government bodies or the legislative process. Improper influence may include conferring gifts, privileges or benefits to influence decisions

3. **A member shall practice the highest standards of honesty, accuracy, integrity and truth, and shall not knowingly disseminate false or misleading information.**  
Members shall not make extravagant claims or unfair comparisons, nor assume credit for ideas and words not their own.

Members shall not engage in professional or personal conduct that will bring discredit

to themselves, the Society or the practice of public relations.

4. **A member shall deal fairly with past or present employers / clients, fellow practitioners and members of other professions.**

Members shall not intentionally damage another practitioner's practice or professional reputation. Members shall understand, respect and abide by the ethical codes of other professions with whose members they may work from time to time.

5. **Members shall be prepared to disclose the names of their employers or clients for whom public communications are made and refrain from associating themselves with anyone who would not respect such policy.**

Members shall be prepared to disclose publicly the names of their employers or clients on whose behalf public communications is made. Members shall not associate themselves with anyone claiming to represent one interest, or professing to be independent or unbiased, but who actually serves another or an undisclosed interest.

6. **A member shall protect the confidences of present, former and prospective employers / clients.**

Members shall not use or disclose confidential information obtained from past or present employers / clients without the expressed permission of the employers / clients or an order of a court of law.

7. **A member shall not represent conflicting or competing interests without the expressed consent of those concerned, given after a full disclosure of the facts.**

Members shall not permit personal or other professional interests to conflict with those of an employer / client without fully disclosing such interests to everyone involved.

8. **A member shall not guarantee specified results beyond the member's capacity to achieve.**

9. **Members shall personally accept no fees, commissions, gifts or any other considerations for professional services from anyone except employers or clients for whom the services were specifically performed.**

[http://www.cprs.ca/aboutus/code\\_ethic.aspx](http://www.cprs.ca/aboutus/code_ethic.aspx)

# IABC Code of Ethics for Professional Communicators

## PREFACE

Because hundreds of thousands of business communicators worldwide engage in activities that affect the lives of millions of people, and because this power carries with it significant social responsibilities, the International Association of Business Communicators developed the Code of Ethics for Professional Communicators.

The Code is based on three different yet interrelated principles of professional communication that apply throughout the world.

These principles assume that just societies are governed by a profound respect for human rights and the rule of law; that ethics, the criteria for determining what is right and wrong, can be agreed upon by members of an organization; and, that understanding matters of taste requires sensitivity to cultural norms.

These principles are essential:

Professional communication is legal.

Professional communication is ethical.

Professional communication is in good taste.

Recognizing these principles, members of IABC will:

Engage in communication that is not only legal but also ethical and sensitive to cultural values and beliefs;

Engage in truthful, accurate and fair communication that facilitates respect and mutual understanding;

adhere to the following articles of the IABC Code of Ethics for Professional Communicators.

Because conditions in the world are constantly changing, members of IABC will work to improve their individual competence and to increase the body of knowledge in the field with research and education.

## ARTICLES

1. Professional communicators uphold the credibility and dignity of their profession by practicing honest, candid and timely communication and by fostering the free flow of essential information in accord with the public interest.
2. Professional communicators disseminate accurate information and promptly correct any erroneous communication for which they may be responsible.
3. Professional communicators understand and support the principles of free speech, freedom of assembly, and access to an open marketplace of ideas and act accordingly.
4. Professional communicators are sensitive to cultural values and beliefs and engage in fair and balanced communication activities that foster and encourage mutual understanding.
5. Professional communicators refrain from taking part in any undertaking which the communicator considers to be unethical.
6. Professional communicators obey laws and public policies governing their professional activities and are sensitive to the spirit of all laws and regulations and, should any law or public policy be violated, for whatever reason, act promptly to correct the situation.
7. Professional communicators give credit for unique expressions borrowed from others and identify the sources and purposes of all information disseminated to the public.
8. Professional communicators protect confidential information and, at the same time, comply with all legal requirements for the disclosure of information affecting the welfare of others.
9. Professional communicators do not use confidential information gained as a result of professional activities for personal benefit and do not represent conflicting or competing interests without written consent of those involved.
10. Professional communicators do not accept undisclosed gifts or payments for professional services from anyone other than a client or employer.
11. Professional communicators do not guarantee results that are beyond the power of the practitioner to deliver.
12. Professional communicators are honest not only with others but also, and most importantly, with themselves as individuals; for a professional communicator seeks the truth and speaks that truth first to the self.

## **ENFORCEMENT AND COMMUNICATION OF THE IABC CODE OF ETHICS**

IABC fosters compliance with its Code by engaging in global communication campaigns rather than through negative sanctions. However, in keeping with the sixth article of the IABC Code, members of IABC who are found guilty by an appropriate governmental agency or judicial body of violating laws and public policies governing their professional activities may have their membership terminated by the IABC executive board following procedures set forth in the association's bylaws.

IABC encourages the widest possible communication about its Code.

The IABC Code of Ethics for Professional Communicators is published in several languages and is freely available to all: Permission is hereby granted to any individual or organization wishing to copy and incorporate all or part of the IABC Code into personal and corporate codes, with the understanding that appropriate credit be given to IABC in any publication of such codes.

The IABC Code is published on the association's web site. The association's bimonthly magazine, *Communication World*, publishes periodic articles dealing with ethical issues. At least one session at the association's annual conference is devoted to ethics. The international headquarters of IABC, through its professional development activities, encourages and supports efforts by IABC student chapters, professional chapters, and regions to conduct meetings and workshops devoted to the topic of ethics and the IABC Code. New and renewing members of IABC sign the following statement as part of their application: "I have reviewed and understand the IABC Code of Ethics for Professional Communicators."

As a service to communicators worldwide, inquiries about ethics and questions or comments about the IABC Code may be addressed to members of the IABC Ethics Committee. The IABC Ethics Committee is composed of at least three accredited members of IABC who serve staggered three-year terms. Other IABC members may serve on the committee with the approval of the IABC executive committee. The functions of the Ethics Committee are to assist with professional development activities dealing with ethics and to offer advice and assistance to individual communicators regarding specific ethical situations.

While discretion will be used in handling all inquiries about ethics, absolute confidentiality cannot be guaranteed. Those wishing more information about the IABC Code or specific advice about ethics are encouraged to contact IABC World Headquarters (601 Montgomery Street, Suite 1900, San Francisco, CA 94111 USA; phone, +1 415.544.4700; fax, +1 415.544.4747).

<http://www.iabc.com/about/code.htm>



# Public Relations Society of America Member Code of Ethics

## *Preamble*

Public Relations Society of America Member Code of Ethics 2000

- Professional Values
- Principles of Conduct
- Commitment and Compliance

This Code applies to PRSA members. The Code is designed to be a useful guide for PRSA members as they carry out their ethical responsibilities. This document is designed to anticipate and accommodate, by precedent, ethical challenges that may arise. The scenarios outlined in the Code provision are actual examples of misconduct. More will be added as experience with the Code occurs.

The Public Relations Society of America (PRSA) is committed to ethical practices. The level of public trust PRSA members seek, as we serve the public good, means we have taken on a special obligation to operate ethically.

The value of member reputation depends upon the ethical conduct of everyone affiliated with the Public Relations Society of America. Each of us sets an example for each other - as well as other professionals - by our pursuit of excellence with powerful standards of performance, professionalism, and ethical conduct.

Emphasis on enforcement of the Code has been eliminated. But, the PRSA Board of Directors retains the right to bar from membership or expel from the Society any individual who has been or is sanctioned by a government agency or convicted in a court of law of an action that is in violation of this Code.

Ethical practice is the most important obligation of a PRSA member. We view the Member Code of Ethics as a model for other professions, organizations, and professionals.

## *PRSA Member Statement of Professional Values*

This statement presents the core values of PRSA members and, more broadly, of the public relations profession. These values provide the foundation for the Member Code of Ethics and set the industry standard for the professional practice of public relations. These values are the fundamental beliefs that guide our behaviors and decision-making process. We believe our professional values are vital to the integrity of the profession as a whole.

### ADVOCACY

We serve the public interest by acting as responsible advocates for those we represent. We provide a voice in the marketplace of ideas, facts, and viewpoints to aid informed public debate.

### HONESTY

We adhere to the highest standards of accuracy and truth in advancing the interests of those we represent and in communicating with the public.

### EXPERTISE

We acquire and responsibly use specialized knowledge and experience. We advance the profession through continued professional development, research, and education. We build mutual understanding, credibility, and relationships among a wide array of institutions and audiences.

## INDEPENDENCE

We provide objective counsel to those we represent. We are accountable for our actions.

## LOYALTY

We are faithful to those we represent, while honoring our obligation to serve the public interest.

## FAIRNESS

We deal fairly with clients, employers, competitors, peers, vendors, the media, and the general public. We respect all opinions and support the right of free expression.

## ***PRSA Code Provisions***

### **FREE FLOW OF INFORMATION**

Core Principle Protecting and advancing the free flow of accurate and truthful information is essential to serving the public interest and contributing to informed decision making in a democratic society.

#### Intent

To maintain the integrity of relationships with the media, government officials, and the public.

To aid informed decision-making.

#### Guidelines

A member shall:

Preserve the integrity of the process of communication.

Be honest and accurate in all communications.

Act promptly to correct erroneous communications for which the practitioner is responsible.

Preserve the free flow of unprejudiced information when giving or receiving gifts by ensuring that gifts are nominal, legal, and infrequent.

Examples of Improper Conduct Under this Provision:

A member representing a ski manufacturer gives a pair of expensive racing skis to a sports magazine columnist, to influence the columnist to write favorable articles about the product.

A member entertains a government official beyond legal limits and/or in violation of government reporting requirements.

### **COMPETITION**

Core Principle Promoting healthy and fair competition among professionals preserves an ethical climate while fostering a robust business environment.

#### Intent

To promote respect and fair competition among public relations professionals.

To serve the public interest by providing the widest choice of practitioner options.

Guidelines A member shall:

Follow ethical hiring practices designed to respect free and open competition without deliberately undermining a competitor.

Preserve intellectual property rights in the marketplace.

Examples of Improper Conduct Under This Provision:

A member employed by a "client organization" shares helpful information with a counseling firm that is competing with others for the organization's business.

A member spreads malicious and unfounded rumors about a competitor in order to alienate the competitor's clients and employees in a ploy to recruit people and business.

### **DISCLOSURE OF INFORMATION**

Core Principle Open communication fosters informed decision making in a democratic society.

Intent To build trust with the public by revealing all information needed for responsible decision making.

Guidelines A member shall:

Be honest and accurate in all communications.

Act promptly to correct erroneous communications for which the member is responsible.

Investigate the truthfulness and accuracy of information released on behalf of those represented.

Reveal the sponsors for causes and interests represented.

Disclose financial interest (such as stock ownership) in a client's organization.

Avoid deceptive practices.

Examples of Improper Conduct Under this Provision:

Front groups: A member implements "grass roots" campaigns or letter-writing campaigns to legislators on behalf of undisclosed interest groups.

Lying by omission: A practitioner for a corporation knowingly fails to release financial information, giving a misleading impression of the corporation's performance.

A member discovers inaccurate information disseminated via a Web site or media kit and does not correct the information.

A member deceives the public by employing people to pose as volunteers to speak at public hearings and participate in "grass roots" campaigns.

### **SAFEGUARDING CONFIDENCES**

Core Principle Client trust requires appropriate protection of confidential and private information.

Intent To protect the privacy rights of clients, organizations, and individuals by safeguarding confidential information.

Guidelines

A member shall: Safeguard the confidences and privacy rights of present, former, and prospective clients and employees.

Protect privileged, confidential, or insider information gained from a client or organization.

Immediately advise an appropriate authority if a member discovers that confidential information is being divulged by an employee of a client company or organization.

Examples of Improper Conduct Under This Provision:

A member changes jobs, takes confidential information, and uses that information in the new position to the detriment of the former employer.

A member intentionally leaks proprietary information to the detriment of some other party.

## **CONFLICTS OF INTEREST**

Core Principle Avoiding real, potential or perceived conflicts of interest builds the trust of clients, employers, and the publics.

Intent To earn trust and mutual respect with clients or employers.

To build trust with the public by avoiding or ending situations that put one's personal or professional interests in conflict with society's interests.

Guidelines A member shall:

Act in the best interests of the client or employer, even subordinating the member's personal interests.

Avoid actions and circumstances that may appear to compromise good business judgment or create a conflict between personal and professional interests.

Disclose promptly any existing or potential conflict of interest to affected clients or organizations.

Encourage clients and customers to determine if a conflict exists after notifying all affected parties.

Examples of Improper Conduct Under This Provision The member fails to disclose that he or she has a strong financial interest in a client's chief competitor.

The member represents a "competitor company" or a "conflicting interest" without informing a prospective client.

## **ENHANCING THE PROFESSION**

Core Principle Public relations professionals work constantly to strengthen the public's trust in the profession.

Intent To build respect and credibility with the public for the profession of public relations.

To improve, adapt and expand professional practices.

Guidelines A member shall: Acknowledge that there is an obligation to protect and enhance the profession.

Keep informed and educated about practices in the profession to ensure ethical conduct.

Actively pursue personal professional development.

Decline representation of clients or organizations that urge or require actions contrary to this Code.

Accurately define what public relations activities can accomplish.

Counsel subordinates in proper ethical decision making.

Require that subordinates adhere to the ethical requirements of the Code.

Report ethical violations, whether committed by PRSA members or not, to the appropriate authority.

Examples of Improper Conduct Under This Provision: A PRSA member declares publicly that a product the client sells is safe, without disclosing evidence to the contrary.

A member initially assigns some questionable client work to a non-member practitioner to avoid the ethical obligation of PRSA membership.

### ***PRSA Member Code of Ethics Pledge***

I pledge:

To conduct myself professionally, with truth, accuracy, fairness, and responsibility to the public; To improve my individual competence and advance the knowledge and proficiency of the profession through continuing research and education; And to adhere to the articles of the Member Code of Ethics 2000 for the practice of public relations as adopted by the governing Assembly of the Public Relations Society of America.

I understand and accept that there is a consequence for misconduct, up to and including membership revocation.

And, I understand that those who have been or are sanctioned by a government agency or convicted in a court of law of an action that is in violation of this Code may be barred from membership or expelled from the Society.

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Signature

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Date

[http://www.prsa.org/aboutUs/ethics/preamble\\_en.html](http://www.prsa.org/aboutUs/ethics/preamble_en.html)

## APPENDIX D

### Focus Group Materials (Invite Letter, Questionnaire, Discussion Guide and Bios for Focus Group #4)

#### Disclosure Communication Study

Dear Fellow Member of IABC:

I am conducting a series of focus groups with public relations professionals to test a model or guideline for 'disclosure communication' and it would be helpful to add your input into this research.

Ideally, it would be great to have no more than 90 minutes of your time on either the evening of **Wednesday, September 16, from 6:30-8 p.m.** or **Thursday, September 17, from 6:30- 8 p.m.** in the offices of NorthStar Research, 18 King Street East, Suite 1500, Toronto (in the same building as the Beer Bistro). Dinner will be provided.

All you need to bring is your willingness to share an opinion about a proposed model which will help communicators guide their organizations through disclosure situations. Think of the model as a strategic decision-tree to help you and your organization choose what information should be provided to your stakeholders, when it should be provided and how it should be communicated.

Disclosures of this nature may include providing the public with information that could cause an organization to be concerned about reputational damage such as product recalls or the information may be of a more routine nature such as talking about a company's 'green' initiatives.

As part of my doctoral study, I am looking for people to share their thoughts on disclosures and how a model may or may not make it easier to manage these types of situations. If you are able to participate, please send me a reply e-mail at [craig.duhamel@sunnybrook.ca](mailto:craig.duhamel@sunnybrook.ca). Please indicate whether you are available on Wednesday or Thursday evening.

Thank you for your consideration and I hope to see you at one of the focus groups.

Sincerely,

Craig DuHamel ABC  
Vice President, Communications and Stakeholder Relations  
Sunnybrook Health Sciences Centre  
Toronto, Ontario

### Focus Group Participant Questionnaire

- 1) How many years have you been practicing PR / Communications
  - a. 0-5
  - b. 6-10
  - c. 11-20
  - d. 20+
  
- 2) What is your current title?
  - a. Advisor / Officer
  - b. Senior Advisor / Officer
  - c. Manager
  - d. Director
  - e. Vice President
  - f. Other (please specify)
  
- 3) Please indicate the highest level of education you have achieved.
  - a. Certificate diploma
  - b. Bachelor Degree
  - c. Masters
  - d. Doctoral
  - e. Other (please specify)
  
- 4) Please indicate the highest level of education you have achieved in communications or public relations.
  - a. Certificate diploma
  - b. Bachelor Degree
  - c. Masters
  - d. Doctoral
  - e. Other (please specify)
  
- 5) Which of the following best describes your sector of employment?
  - a. Not-for-profit (Non-governmental organization)
  - b. Corporate
  - c. Government
  - d. Health Care
  - e. Education (university, college, other)
  - f. Other (please specify)
  
- 6) Thank you once again for participating in this focus group. If you would you like to be contacted with the results of this research (i.e. publication) please provide a contact e-mail address below.

## Focus Group Research Discussion Outline

1. Introductions and welcome (5 mins)
  - a. Introduce self and explain recording and level of confidentiality to the discussion
  - b. Allow participants to introduce themselves to each other
2. Purpose of discussion and encourage open feedback and criticism (5 mins)
  - a. Need to determine if the model can be used in a practical setting
  - b. The model can be changed based on participant feedback. Please tell me what works and what does not work in the model. And why?
  - c. What could be added and what could be removed and why?
3. Ask participants to define disclosure. (5 mins)
  - a. Are there differences in how you would approach the communication of a 'benign' disclosure (one that does not present risk for your organization) and those that may present more of a risk to the organization?
  - b. What do you think merits public disclosure?
4. Presentation and explanation of the model (15 mins)
  - a. Walk through each step of the model (as presented in the first iteration) and illustrate with examples based on the vignettes used in the interview portion of the research
  - b. Ask for General Questions and feedback about the model
5. How do you receive information about disclosure situations in your organizations (i.e. grapevine, issues management model, etc.)? (15 mins)
  - a. What is the optimal method for you to hear about these issues? And why?
  - b. How do you gather information about situations when they happen?
  - c. Does the proposed method in the 'Stakeholder Disclosure Pyramid' make sense to you? What are the pros and cons?
  - d. What would you change/add to model and why?
6. How do you help your organization make decisions about disclosures? (15 mins)
  - a. Does the proposed decision-tree help? In what way?
  - b. What questions would you add/delete? And why?
7. Planning for disclosures (10 mins)
  - a. What is your optimal role in a disclosure?
  - b. How do you balance the needs of audiences and the organization in these situations?
  - c. This model is derivative of the RACE model you have likely already seen would this approach benefit you in these situations? Is it sufficiently flexible? Pros and cons of this portion?
  - d. How do you develop internal and external messaging for disclosures? And why?
8. What impact does organizational culture have on disclosure situations? And how?(5 mins)
  - a. How does organizational culture impact transparency?
9. Codes of Ethics (5 mins)
  - a. Are you aware of codes of ethics and what they may say about disclosure?
  - b. Does your organization have any codes of practice/ethics?
  - c. Opinions of such codes? (and rationale)
  - d. Are they helpful in such situations? Yes/no and why?
  - e. How are you made aware of codes of ethics? Do you have to sign an agreement?
  - f. Would a corporate code of ethics guide you in providing advice about disclosure situations?
10. What methods of evaluation would you use to determine the success of your plan? Why? (10 mins)
11. Other questions or comments?



## **Biographies of Focus Group #4 Participants**

### **Denise Cole**

#### **Principal, Toronto**

**denise@strategycorp.com**

Having worked in key areas of the federal, provincial and municipal governments for almost two decades, Denise is a proven strategist in the public policy field. She has extensive experience managing diverse multi-faceted projects and has developed a reputation for being "a tow truck for stuck intentions".

Before joining StrategyCorp, Denise served as Director of Policy in the Office of the Premier of Ontario, a position she held from December 2000 to April 2002. As Director of Policy, she provided the Premier with political and policy advice on all matters destined for Cabinet and was instrumental in ensuring that the government's priorities were realized and that key legislation was implemented.

Denise's positions in government have been varied: Chief of Staff to the Ontario Minister of Education; Chief of Staff to the Ontario Minister of Community & Social Services; Executive Assistant, External Liaison, Office of the Premier of Ontario; Special Advisor to the Mayor of the City of Toronto; Deputy Director, Royal Commission on New Reproductive Technologies; Executive Assistant to the Chief of Staff, Office of the Prime Minister of Canada; Special Assistant, Social Policy, Office of the Prime Minister of Canada; Executive Assistant & Policy Advisor to the federal Minister Responsible for the Status of Women and federal Minister of State (Privatization & Regulatory Affairs), and Special Assistant to the federal Minister of State (Finance).

Denise has also worked in the private sector as the Vice President, Ontario Region with the Canadian Soft Drink Association (CSDA), the association for the soft drink industry.

Community involvement is important to Denise and she has extensive experience with numerous volunteer and community organizations. In recognition of Denise's community service, she was a recipient of the Governor General's Commemorative Medal on the 125th Anniversary of the Canadian Confederation in 1992. Also in 1992, the Federal Government of Canada appointed Denise a member of the Canadian Advisory Council on the Status of Women. In June 2003, she was appointed a member of the Ontario Women's Health Council by the Ontario Minister of Health and Long-Term Care.

Denise is a long-standing Progressive Conservative Party member and volunteer. She was the National Secretary of the Progressive Conservative Party of Canada from 1991 to 1994 and was a candidate in the 1993 federal election.

Denise graduated from the Faculty of Humanities at McMaster University with a B.A. in English.

**David MacNaughton**

**Chairman, Toronto**

**[dmacnaughton@strategycorp.com](mailto:dmacnaughton@strategycorp.com)**

David MacNaughton brings to StrategyCorp a wealth of political, business and government experience. His extensive and comprehensive career has spanned both the public and private sectors.

As an entrepreneur he transformed the Government Relations consulting industry by building an organization which comprised government relations, public opinion research and public relations, operating in Canada, the U.S. and the U.K., and employing more than 250 people.

After selling his business in 1989 Mr. MacNaughton became CEO of Canada's largest government and public relations firm and subsequently North American CEO of the world's largest PR firm.

From 1996 until 2003 he was president of a company specializing in private public partnerships and a senior advisor to one of Canada's leading investment banks. David's public sector experience includes work at both the federal and provincial levels of government. At the federal level he spent six years as Executive Assistant to the Minister, at the Ministries of Transport, Industry and Foreign Affairs. A long-time Liberal Party activist, David has been involved federally in numerous election and political campaigns, including the Paul Martin Leadership Campaign.

In Ontario David chaired Premier David Peterson's successful 1987 election campaign and was a senior advisor to the Leader in the 2003 provincial election, which resulted in the successful election of Dalton McGuinty as Premier of Ontario.

From October 2003 until joining StrategyCorp, Mr. MacNaughton served as Principal Secretary to the Premier of Ontario. In that role he focused on bringing private sector principles of sound business management to the Ontario government. His responsibilities as Principal Secretary included a particular emphasis on energy, budget and asset management, and private financing initiatives.

Active in community affairs Mr. MacNaughton has served on the boards of the North York General Hospital, the Stratford Festival, the National Ski Academy, TV Ontario and the Toronto French School.

## **John Matheson**

### **Principal, Toronto**

**[matheson@strategycorp.com](mailto:matheson@strategycorp.com)**

John has been a principal at StrategyCorp since 1998. Since that time, he has managed successful policy and issue management projects relating to:

- Capital financing of transportation and health care projects
- Land use planning and environmental regulation
- Property tax policy

John has a particular expertise in the politics of municipal governance and restructuring, and has acted as a consultant to most of the major municipalities in Ontario.

John's policy expertise is grounded in his legal background. He was called to the Bar of Ontario in 1993 and practiced Commercial and Insurance law in Toronto with a major Bay Street firm. As a result, John has frequently been engaged to support legal professionals in issue management and government relations activities.

Prior to joining StrategyCorp, John served as Chief of Staff to Ontario's Minister of Municipal Affairs and Housing. In that capacity, he was instrumental in the design and management of the most significant overhaul of the province's municipal sector in a generation, including initiatives such as the amalgamation of the City of Toronto, the creation of a new municipal taxation and assessment regime and key reforms to the Municipal Act and the Planning Act.

John is a volunteer Progressive Conservative Party activist at both the federal and provincial levels. He has extensive experience in every aspect of political organization and, has played a central role in policy platform development for mayoral and party leadership candidates. He also led the program that trained all provincial PC candidates in policy and media relations skills in the last three general elections.

A frequent public speaker and commentator in the news media, John appears regularly on television and radio. He holds a BA (Hons) in political studies from Queen's University in Kingston and an LLB from the University of Toronto.

**Dave McCleary**

**Senior Consultant**

**[dmcclary@strategycorp.com](mailto:dmcclary@strategycorp.com)**

Dave McCleary has 35 years of experience in public policy, project management, government relations, issues management and advocacy, urban, transportation and social planning.

Until 2006, Dave served in various positions with the Regional Municipality of Halton including Manager of Long Range and Policy Planning, Senior Policy Advisor and Executive Assistant to the Chief Administrative Officer and OMB Case Manager and Senior Policy Advisor to the Region's Corporate Counsel.

Before joining StrategyCorp in 2008, Dave was the Toronto Board of Trade's Municipal Affairs Advisor.

As Senior Policy Advisor in Halton, Dave provided advice on governance matters, inter-governmental relations, issues management and corporate projects and policy advice to the Regional Chairman. In 1999, he served as Chairman of the task force that prepared the "Transportation Funding in the Greater Toronto Area and Hamilton-Wentworth" report. This report and the resulting government relations strategy were successful in placing this issue onto the public and political agenda. As a result, both the Federal and Provincial Government made commitments to transfer gas tax monies to the municipal sector.

In 2003, Dave was a co-winner of the Canadian Public Relations Society National Award (Gold) in Issues Management.

**Leslie Noble**

**Principal, Toronto**

**leslie@strategycorp.com**

Leslie is one of Canada's leading issues management and strategic/political consulting professionals.

A founder of StrategyCorp, she applies her years of consulting experience to assist private sector companies seeking to maximize the benefits of their involvement in the public policy process.

Leslie's issues and crisis management expertise have resulted in the successful resolution of many business and public policy challenges for her clients.

Prior to forming StrategyCorp in 1995, she built an extensive private consulting practice on her own, serving a number of prominent Canadian and foreign firms in numerous sectors.

Leslie's political activity in the Progressive Conservative Party, in Ontario and across Canada, is well known. She has served as a strategic advisor on numerous general election and leadership campaigns both federally and provincially, including as Campaign Manager for former Ontario Premier Mike Harris in his successful 1995 and 1999 campaigns.

Leslie's government experience includes service in the offices of the Ontario Minister of Treasury and Economics and the Ontario Minister of Education.

She is a frequent commentator in various news media on Ontario and federal politics and government.

Leslie holds a BA (Hons) in Political Economy from the University of Toronto, and has served on the Board of Directors of Mount Sinai Hospital, the Toronto International Film Festival Group and the Albany Club of Toronto.

## **Katie Telford**

### **Senior Consultant**

Katie brings to StrategyCorp extensive experience from various senior roles in Ottawa and at Queen's Park in the areas of communications, public policy, platform development and political strategy.

Described in the media as a "powerful" and "strong" woman in Federal Liberal politics, and a "brilliant" player in provincial public policy, Katie has provided senior counsel on a full range of federal and provincial issues for the Liberal Party of Canada and the McGuinty government.

Katie has served as the Chief of Staff to the Ontario Minister of Education. In that role, she was a member of Premier McGuinty's Education Results Team and a member of the Ministry's senior management group fulfilling a core electoral mandate in one of the government's largest areas of responsibility.

Katie knows the mechanics of government intimately. While working at Education, she was the government lead, facilitating talks between management and labour leading to the first successful province wide labour agreement in Ontario's education sector. The Deputy Minister of Education described the negotiations in his recent book by writing: "It was an amazing feat of political effort and strategy, which a few months earlier virtually nobody in the province would have thought possible."

Katie also has direct experience at the federal level, where she served as Deputy Chief of Staff in the Office of the Leader of the Official Opposition handling numerous complex federal policy and political files.

Katie served as the National Campaign Director for Gerard Kennedy's 2006 Federal Liberal leadership campaign which, as the Toronto Star reported, would "change the dynamic of the race" right from early on.

Katie has worked on numerous election campaigns including traveling the country during a federal election campaign as a senior political advisor on the Leader's plane and working in the war room during the successful 2003 Ontario provincial election campaign.

Katie received her Honours degree in Political Science with a minor in History from the University of Ottawa where she studied in both French and English.