



SPECIAL REPORT

# Seven principles for managing transparency

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## INTRODUCTION

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### AUTHORS

The saying “information is power” is commonly attributed to Francis Bacon (1561-1626). However, the British philosopher was referring to knowledge (*ipsa scientia potestas est, translated as “knowledge is power”*). His secretary and fellow philosopher, Thomas Hobbes, went a step further in *Leviathan* by establishing the connection between “knowledge” and “opinion” applied to the realm of an individual’s relationship with institutional power. Hobbes was concerned with the use each person could make of his or her free will (“man is a wolf to man”) to the point of suggesting that this ‘micro-power’ be partially relinquished to the State of “Leviathan” so they could correct the natural imbalance of the human condition.

The digital age we inhabit is the result of the convergence between information systems and telecommunications. The main consequence is information – and consequently knowledge – has become more accessible, democratic, universal and immediate. People from the 17th century also wanted to be informed, but they did not have the means for direct access to the data or opinions they needed to make informed decisions. However, today’s digital citizens have the power to access information virtually anytime and anywhere. In many instances, their lives take place online and on live streaming.

This ease of access involves an important paradigm shift: power no longer resides in having information but in one’s ability to disseminate it. Information is not given, it is taken. In some ways citizens are recovering their share of power, which they had formerly relinquished to collective institutions. “The king is the man who can,” wrote the historian Thomas Carlyle. And today’s men and women, armed with the powers conferred by technology, have decided to govern their own information needs – not only as passive receivers but also as active senders.

The internet era has also toppled another paradigm: approaching information and knowledge from a perspective of control. In a setting defined by uncertainty, trying to exert control over information can only lead to anxiety. The decision of whether to inform is no longer an option; even the choice of when to inform is frequently unavailable.

“Silence does not fill the space,” declares Jose Carlos Losada Diaz in his book *(No) Crisis. Crisis communications in a connected world* (currently only available in Spanish: [\(No\) Crisis. Comunicación de crisis en un mundo conectado](#), published by

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UOC). The University of Murcia's communications professor sustains that remaining silent during a crisis is the wrong strategy because other sources will fill the void left by your organization. Silence does not fill the space, but it does say a lot, especially in these distrustful times.

In addition to these two paradigm shifts, there is also a new formulation of the reason-emotion dichotomy. Emotions have always been important, but now they play an even larger role in information processes. This is basically due to three reasons: the first is the enhanced capacity to communicate our emotions beyond the individual sphere of influence, particularly through social media; the second reason is the increased ability of our messages to go viral thanks to the internet; the third reason has to do with the superficiality that comes with increased speed, which directly affects our reactions and opinions when we receive information via news or other message formats.

The internet lets us look further and do more than ever before. It is the door to a universe with practically no borders where distance proves irrelevant. In fact, access to the internet and the quality of the connection represent the first factor of discrimination for people in search of opportunity. The larger the

ocean through which we can navigate, the less momentum we need to explore a specific space. In terms of information, the world has a more extensive and excitable outer layer. And the temptation is to let our skin be stroked instead of poking through to the deeper layers, where reason and emotion are more stable and balanced.

The paradigm shifts regarding information ownership, which has been largely abandoned, and the control (or lack thereof) over information and the ensuing effects, have led to a new scenario for communications in which transparency is no longer a strategy or an option: it is an essential condition.

We are at the beginning of the age of 'hyper-transparency.' This concept could be defined as the sum of information, online data and speed - all in an environment of distrust toward institutions (including companies) that have traditionally organized communal life. The greater the distrust, the greater the demand for transparency.

“No buzzword dominates contemporary public discourse so much as 'transparency.' Above all, it is emphatically invoked in connection with freedom of information. The omnipresent demand for transparency, which has reached the point of fetishism

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and totalization, goes back to a paradigm shift that cannot be restricted to the realm of politics and economics.” *The Transparency Society*, by Byung-Chul Han, South Korean-Born German author and philosopher.

Hyper-transparency is the sign of an era in which there is “nowhere to run and nowhere to hide,” according to Andrea Bonime-Blanc, founder of the company GEC Risk Advisory. To that extent, the first assignment of any organization wishing to prepare for the upcoming times should be to accept that there is no option to hide, remain silent or much less be the passive object of conversations taking place around you.

Transparency is essentially an attitude.

As such, it should be approached according to the following principles:

## 1. ACCESSIBILITY

This principle is to transparency as bravery is to a soldier. Organizations must build personalized information menus that are accessible to their stakeholders (which are increasingly difficult to categorize). This means relevant information should be easy to reach from wherever the inquirer may be.

Organizations can opt for a responsive design or develop applications for the most common access routes. A responsive design consists of providing the same content and most similar user experience possible to all website users. This differs from other approaches to mobile web development, such as apps, separate URLs or dynamic websites that change depending on the viewing device.

**An example of the accessibility principle applied to transparency is the “in-house” tool developed by Bankinter to enable access for all their employees to information regarding the independent business dealings of the departments in which they work. This initiative is a show of trust to the people who work at the organization while at the same time representing an efficiency measure, as it reduces the internal bureaucracy associated with access to information, especially as it relates to different divisions or business units**

## 2. RELEVANCE

La Total transparency does not exist. In fact, theoretically, 100% transparency would be in conflict with the principle of relevance. The information seeker should not be presented with volumes of information

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This guideline is essential to applying the ‘Cooperative Principle’ developed by Paul Grice: “Make your conversational contribution such as it is required, at the stage at which it occurs, by the accepted purpose or direction of the talk exchange in which you are engaged.” The British philosopher, especially known for his contributions to the philosophy of language with regards to meaning and communication, developed this principle according to four maxims:

1. **Quantity:** Make your contribution as informative as is required for the current purposes of the exchange. Do not make your contribution more informative than is required.
2. **Truth:** Do not say what you believe to be false. Do not say that for which you lack adequate evidence.
3. **Relation or Relevance:** Be timely and relevant.
4. **Manner:** Avoid obscurity of expression. Avoid ambiguity. Be brief and orderly.

His disciples Sperber and Wilson focused their research on the relevance theory, according to which, “the

expectations of relevance raised by an utterance are precise enough, and predictable enough, to guide the hearer towards the speaker’s meaning.”

**In 2013, Juan Bejar Ochoa became the CEO of Fomento de Construcciones y Contratas (FCC), a company that operates in the construction and infrastructure industry, not precisely known for its high level of transparency. In order to facilitate information to the company’s employees during a time of heightened concern due to the business group’s crisis situation and resulting adjustment and transformation process, he asked the general director of communications (and member of the steering committee) to draft a summary of the decisions adopted by that body and publish the information online. Needless to say, the summary of the meetings did not include the minutes or reveal any information that could compromise their business strategy; however, it did include a list of the matters being broached and the main decisions being taken so all the people at FCC could have a clear vision of where the company was headed.**

### 3. PLAIN LANGUAGE

The importance of using plain language is a necessary consequence of the preceding principle. [The International Plain Language Federation](#)

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defines this concept as follows: “A communication is in plain language if its wording, structure, and design are so clear that the intended audience can easily find what they need, understand what they find, and use that information.”

In 2015, the National Planning Department of the Government of [Colombia](#) published a [Guide for Plain Language for Public Servants](#) (*Guía de lenguaje claro para servidores públicos de Colombia*) illustrating the advantages of using simple and straightforward language that can be easily understood by its citizens. The benefits are applicable to any public or private organization.

Plain language:

- Reduces mistakes and the need for unnecessary explanations.
- Reduces costs and the financial burden for citizens.
- Reduces administrative and operational costs for entities.
- Increases efficiency for processing citizen requests.
- Reduces the use of intermediaries.
- Promotes effective reporting on behalf of the State.
- Promotes transparency and access to public information.

- Facilitates citizens’ oversight of public management and promotes public participation.
- Promotes social inclusion for groups who are differently-abled, so they may effectively enjoy the same rights as their fellow country people.

**An example of this principle is the TCR Project (Transparent, Clear and Responsible) carried out by BBVA in 2014. The outcome is evidenced in the company’s TCR product information sheets, contracts, telemarketing scripts, complaint responses, and advertising campaigns. In regard to the product sheets, the bank’s website states: “It is vital that customers clearly understand the benefits, advantages, costs and risks prior to purchasing a product. For this reason, the TCR product sheets (brief documents with the relevant information on the product) exist for 90% of BBVA’s products for private customers in Spain, Mexico, the United States, Argentina, Chile, Peru, Colombia and Venezuela.”**

#### 4. MATERIALITY

Plain language extends over into the principle of materiality. Although presently it is being applied to corporate social responsibility policies, the concept originated in accounting rules. International accounting guidelines

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introduce materiality through the concept of relative importance, which allows for certain financial information (entries, data and/or events) to be excluded from financial statements if it is not materially relevant.

Within the sphere of CSR, materiality is defined by the [Global Reporting Initiative \(GRI\)](#) as “the threshold at which aspects become sufficiently important that they should be reported.” A report should cover aspects that reflect any significant financial, environmental and social impact on the organization’s influence (positive or negative), vision, objectives and strategy.

Materiality applied to transparency implies organizing the information and its distribution according to the impact it can have on stakeholders and interest groups. Undoubtedly, the application of the materiality principle requires the entity be aware of its stakeholders’ concerns and expectations. Hence, the organization should not offer the information *it* wants, but the information *others* want (explicitly or potentially).

**Mapfre has been applying the materiality principle in its reporting since 2014. The insurance company carries**

**out this transparency exercise in two phases. The first phase involves an internal analysis of the identified issues: “Specific issues have been determined for each stakeholder group, and transversal issues, among which the most prominent ones are transparency, human rights, innovation, information security or the environment.” The second phase consists in consulting the stakeholders by means of an online, anonymous and confidential survey.**

## 5. TRACEABILITY

The International Organization for Standardization (ISO) defines traceability as “the property of the result of a measurement or the value of a standard whereby it can be related to stated references, usually national or international standards, through an unbroken chain of comparisons all having stated uncertainties.”

Perhaps it can be worded in a simpler way: where the information comes from, what or who supports it and with what references.

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The label should include information about the origin of the ingredients, the processes undergone by the product and the distribution and location following delivery.

**Traceability is one of the principles applied by Nestlé to ensure the palm oil used in its products does not contribute to deforestation. “We’re working with our partners, including The Forest Trust (TFT), to improve transparency, traceability and supplier behavior in the palm oil industry [...] to ensure that our suppliers comply with our Responsible Sourcing Guideline.” Nestlé, which uses 0.7% of all the palm oil produced on the planet, assures that it can trace the origin of 90% of the product and has publicly declared its ambition “to achieve 100% responsibly sourced palm oil by 2020.”**

## 6. FOLLOW THE MONEY

One of the most effective methods for discovering the motivation behind a certain piece of information is the financial benefit that can come from its dissemination. This principle is known as “follow the money.”

A report published by a group of 39 experts at the request of the European Commission qualifies this principle one of the keys to transparency. The group – headed by Madeleine de Cock Buning, a professor

from the University of Utrecht who specializes in intellectual property, copyright and media – recommends this principle be applied to advertising to avoid financing organizations that spread disinformation.

This principle does not only apply to marketing communication but to all the information published by an organization. Knowing who is behind a message, who “owns it,” can help convey the real meaning and intention.

The pharmaceutical industry’s [Code of Good Practices](#) is a good example. The affiliated companies are obligated to publish information regarding donations to health organizations, spending on training activities and professional/scientific conferences, professional fees and R&D agreements. Soon, this reporting will include itemized information on every specialist or person who receives donations, gifts or payments in kind.

**The pharmaceutical industry states: “the Code becomes key to guarantee that the information provided in the field of promotion of prescription-only medicines is complete, accurate and objective, everything to benefit the interests of both the Healthcare Administration and the pharmaceutical industry itself, with the aim to protect and improve public health.”**

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## 7. CONTEXT

El The money backing certain information is part of its context. This term comes from the Latin *contextus* and refers to everything surrounding, physically or symbolically, an event. Based on the *context*, a person can better interpret and understand a fact or event. Putting information into context implies disclosing who does (or says) what, where, under what circumstances and to what end. Putting statements into context authenticates them as it reveals who is behind them.

For organizations, context essentially has two dimensions: the physical circumstances surrounding the communication and the cultural setting. The former refers to when, where and with what elements the communication takes place; the latter refers to the body of knowledge and experience, the behaviors, beliefs and feelings of the individuals who live in a specific community.

In our hyper-connected digital world, information has practically become a commodity. The real value does not reside in the ability to convey news, but in putting that news into context and analyzing the specific circumstances. Within the realm of journalism (and once we are able to get past the wave of triviality that has swept over social networks, one click at a time), the news outlets with the brightest future will be those that can better explain the facts

without renouncing to their editorial policy. A similar thing is true in the communications industry, where the most highly-regarded professionals are not those who know the most about their company but about the industry in which that company operates.

The **Global Capabilities Framework** (GCF), a project conducted by the University of Huddersfield (United Kingdom) and the Global Alliance for Public Relations and Communication Management, supports that “contextual intelligence” is one of the key skills for communicating. The document divides contextual intelligence into three sub-capacities: 1) The ability to see the big picture; that is, the ability to consider the social, cultural, political, technological and economic implications; 2) The ability to identify strategic opportunities and threats, issues and trends; and 3) The ability to operate in a connected world, demonstrating broad understanding of local and global diversity in culture, values and beliefs.

**The principle of context partly explains the motivations of Orange for creating its own communication outlet: Nobot. “We want to offer a new proposal: a platform that pays more attention to the *why* than to the *what* or the *where*, and celebrates the benefits that technology brings to people and organizations. Although the format and**

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content are journalistic, it is not our intention to compete with media outlets that already do an excellent job of covering current technological developments in our country. However, we will try to complement that

information using our own personal voice, the voice of Orange.” This declaration of principles is accompanied by a few candid admissions: “we will not be objective, but we will be honest.”

### MISSION OF THE COMMUNICATIONS DIRECTOR

El In its 2018 edition, the [Global Communication Report](#) stresses the need to promote ethical behavior from executive communication positions due to the increasingly strong connection between ethics and reputation. Transparency demonstrates an ethical commitment to one's stakeholders.

As communication professionals, we can choose between letting the transparency flag fly or hiding behind it. Up to this point, many organizations have understood transparency as a legal requirement, choosing to await instructions indicating the *shortest* route to compliance instead of the *straightest*.

The context of hyper-transparency brought about by technological advances and citizens' desire for greater participation have placed organizations under the spotlight. Their actions are being constantly scrutinized and the path to concealment has become ever darker.

Transparency is at the forefront of communication processes. It is not only the antidote against bad practices, but an opportunity to generate value in the form of credibility, trust, respect and commitment.

Therefore, one of the most important missions of any Communications Director is creating safe spaces for dialogue in which an honest exchange of information can take place between the organization and its stakeholders. The communicator is also responsible for generating relevant content to discuss in those spaces and conveying the constructive outcome of those conversations to the decision-makers.

## EUROPEAN COMMISSION: TRANSPARENCY TO FIGHT FAKE NEWS

Increasing transparency is one of the five policies proposed by a group of European experts to fight against disinformation, of which 'fake news' is a prime example.

The report published by the [High Level Expert Group on Fake News and Online Disinformation](#) set up by the European Commission recommends the following actions:

1. Enhance transparency of online news, involving an adequate and privacy-compliant sharing of data about the systems that enable their circulation online.
2. Promote media and information literacy to counter disinformation and help users navigate the digital media environment.
3. Develop tools for empowering users and journalists to tackle disinformation and foster a positive engagement with fast-evolving information technologies.
4. Safeguard the diversity and sustainability of the European news media ecosystem.
5. Promote continued research on the impact of disinformation in Europe to evaluate the measures taken by different actors and constantly adjust the necessary responses.

In summary, the report recommends increased transparency, greater technological empowerment and critical literacy on behalf of information consumers and a reinforced role for journalists as guarantors of freedom of speech and quality of news.

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He has worked as General Manager of Communications and Corporate Responsibility at the construction company FCC and as Director of Communications at the energy company Unión Fenosa and the railway company Renfe. In addition, he has presided over the Spanish Association of Directors of Communications (Dircom) and the Ethical Management Forum (Forética).

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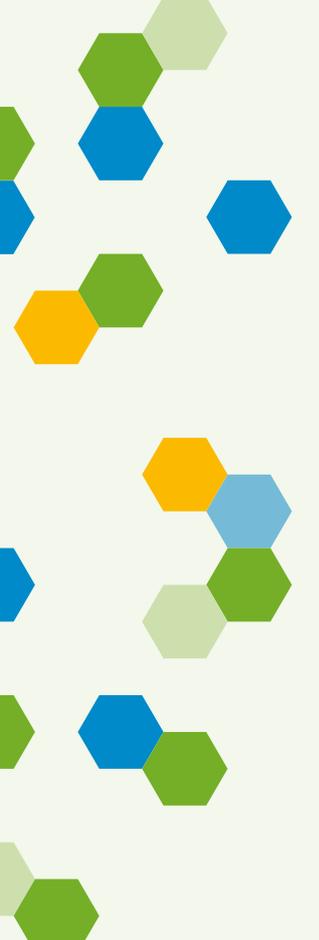
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