The Translucency Corollary: Why Full Transparency is not always the Most Ethical Approach

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Abstract

Rawlins (2008) advocated "transparency through every aspect of corporate communications" (p. 2) that embraces open, authentic communication of organizational successes *and* failures; facilitates ongoing discussion; and relinquishes a seemingly incessant institutional drive to maintain the image of perfection. Transparency is a critical addition to the literature and practice of ethical public relations, as some entities have suffered major damages or have even been forced to close after deceptive withholding of information that was vital to stakeholders. The purpose of this paper, however, is to show that the term *transparency* has been so broadly interpreted, invoked, and abused that it risks losing its intent of open communication that enhances dialogue and benefits both organizations and society. The paper argues that the term *transparency* has two flaws that need to be clarified to strengthen its usage in public relations: (1) Transparency increasingly is interpreted as being completely open *at all times*, but the authors argue there are times when it is in the best legal and logistical interest of the entity to *not* disclose, and in such times this is the most *ethical* stance for both the organization and its stakeholders; and (2) Entities increasingly are spouting self-proclaimed "transparent" communication, when investigation reveals that those claims are smokescreens to deflect an actual disdain for transparency.

Balkin (1999) identified categories of *informational, participatory,* and *accountability* transparency. Others have linked transparency with trust (Jahansoozi, 2006; Gower, 2006). While useful, these linkages and categories do not go far enough in guiding entities toward ethical functioning in today's society. This paper therefore muses over the questions: Under what specific circumstances is transparent communication necessary and beneficial? When is it better to not disclose information, even given today's expectations of instant, complete messaging? In which situations does absolute transparency actually harm stakeholders and societies? The paper argues that in these circumstances, a stance of *translucency* may be more appropriate than actual transparency. Translucency occurs when light passes through a medium, such as frosted glass, in sufficient quantity that the viewer can discern the outline of objects and see in which direction they are moving but they are not completely visible to the eye. With this paper providing parameters under which translucent communication must take place—and why—organizations can offer an outline and shape that will ethically inform, guide, and engage key publics, even when full disclosure is not the best option.

Introduction

In 2009, the United States government encountered a dilemma over the concept of transparency. Members of Congress joined the increasing public demand for the release of photographs that would detail alleged abuses during the interrogation of Iraqi prisoners by U.S. military personnel in Baghdad. Newly elected president Barack Obama and his administration had to decide to what extent releasing the photos would jeopardize future interrogative needs while at the same time risking greater deterioration of the nation's reputation around the world.

This dilemma was reported by CNN.com as follows:

> The notorious Abu Ghraib photos showing U.S. soldiers abusing Iraqi detainees were used by jihadists and cost "a lot of American lives," says Brig. Gen. David Quantock. That's why the head of detainee operations in Iraq agrees with President Obama that more photos of alleged detainee abuse shouldn't be released, *despite promises of transparency*[from the new U.S. administration] (CNN, May 14, 2009—italics added).

Today, we live in what Holzner and Holzner (2006) called "the open society" (p. 2), a global movement toward "the rise of transparency" (p. 5). Transparency increasingly is championed in democratic society and particularly in the public relations field (Rawlins, 2008). It is easy to support the growing need for more openness and honesty in institutional and individual communication. The public relations debacles of Enron's "cooked books," (Calkins, 2004), the accounting fraud of Worldcom (Romar & Calkins, 2006), Bernie Madoff's Ponzi scheme (Keith, 2009), the Tiger Woods fiasco, and many other cases have clearly shown the devastating consequences of individual and corporate deceit. Therefore, clarion calls for transparency are critical. "The message to CEOs is that integrity is very important," said former U.S. Attorney General John Ashcroft, "and that the falsification of … any documentation that relates to your company is a serious matter" (Keith, 2009, p. 1). Public relations professionals are encouraged to serve as the moral conscience of the organizations they serve, and the few treatises advocating transparency have been vital additions to the field's literature and guidelines for ethical practice.

On the other hand, the Abu Ghraib example above is just one of many which indicate that the need for transparency is not beyond debate. It could be argued that transparency has become so prevalent and so frequently discussed that it has entered the realm of "latest buzzword" or overworked cliché. Early in 2010, Lake Superior State University included the term in its 35th annual listing of words that need to be banished for overuse (LSSU, 2010). More importantly, the concept has been advanced with minimal challenge to its moral basis in given circumstances or scenarios. The U.S. interrogation dilemma shows that much more thinking needs to be devoted to the transparency issue, not to determine *whether i*t is appropriate but rather *when* it is appropriate and when it may not fully satisfy the demands of a situation.

Dezenhall (2009) addressed the moral dilemma behind the term *transparency*. He said, "The thirst for transparency and full-disclosure is warranted. We rightly want to know what's under the fingernails of those who have power over our lives. The problem is that transparency has become the insipid new shibboleth for all that is good and noble—a mere bit of corporate and political theater." (p. 1). Lord (2006) also argued that, fundamentally, transparency is "morally right" (p. 21), but explained why it should not continue to be advocated for all circumstances without question:

> Comprehensive analyses about the impact of greater transparency are relatively rare. Analysts mention transparency as part of a solution to particular problems…but do not

take a broader perspective. The result is that discussions of transparency are often one-sided and are focused on its positive effects with little, if any, discussion of costs. Such analyses are not necessarily wrong, but they are incomplete. The cumulative effect is an overwhelming focus on the positive aspects of transparency (p. 16).

The purpose of this paper, then, is to foster additional conversation around the definitions and implications of transparency. As Dezenhall (2009) wrote, "Let us consider the rhetoric of ... William Goldman's *The Princess Bride*. Throughout the narrative, the cunning Sicilian, Vizzini, shouts 'Inconceivable!' whenever a plot doesn't work out. His sidekick … Inigo Montoya, finally counsels Vizzini: 'You keep using that word. I do not think it means what you think it means'" (p. 1). Perhaps the same could be said of the word *transparency*. The authors of this paper believe that the term suffers from two basic mischaracterizations. First, it seems that transparency increasingly is interpreted as being completely open *at all times and in all communication situations.* We believe, however, that there are times when it is in the legal and logistical interest of the entity to *not* disclose information, and in these times not disclosing is the most *ethical* stance for both the organization and its stakeholders. Second, and more alarming, is when organizations proclaim their own "transparent communication" behaviors only to have it revealed through subsequent external investigation that those claims are simply smokescreens to deflect a complete and purposeful eschewing of transparency.

Some conversation on the topic has already begun. Jahansoozi (2006), Gower (2006), and Rawlins (2008), for example, all have correlated transparency with stakeholder trust, and Balkin (1999) identified dimensions of transparency .While these treatises help to enlighten the concept, more examination and discussion is needed in order to adequately guide entities toward more ethical communication. This paper, therefore, raises questions that perhaps have not been asked before, questions particularly related to the daily decisions that public relations people face concerning this issue. For example, when is transparent communication necessary and beneficial? Are there inherent limitations to transparency? If so, under what circumstances would it be better to not disclose information, even given today's expectations of instant and complete messaging? Perhaps most importantly, in which situations is it possible that absolute transparency could actually harm stakeholders and the societies in which organizations operate?

In this paper, an analysis of transparency has been undertaken through three main methods. The first was a review of foundational literature on transparency, not just in public relations but in business, political science, and other fields as well. The second was a review of specific cases wherein (1) transparency went too far and upset the mutual benefits equilibrium between an organization and its stakeholders or (2) some other problem occurred when attempts at openness did not unfold according to the ideal conceptions of transparency. The final mode of investigation came through in-depth interviews with nine senior professionals in public relations and business consulting to seek their thoughts on the topic and particularly to probe for actual experiences with the implementation of transparent communication. These interviews generated several more specific examples where the basic principles of transparency were challenged by practical realities and the weight of competing moral dilemmas.

The examination of this issue has led to our proposal of a new term for those communication situations wherein honesty is critical but where total transparency would not mutually benefit organizations or their stakeholders. The new term is not intended to be a new or replacement theory because we concur that the theory of transparency is one of the critical foundations of ethical public relations. Rather, this new addendum is what may be called a *corollary*—or, in this case, the *translucency corollary*. A corollary follows from an existing proposition (datasegment.com, 2010), so the term fits here because it expands, rather than replaces, the existing transparency theory. This will be explained further below.

Theoretical Framework

With the term *transparency* bantered around considerably today, it is easy to jump into the discussion; but the more difficult task is to dissect what transparency really means. Does transparency entail full disclosure of all information to all people at all times from every organization? Does transparency mean complete honesty and accuracy in information that should be disclosed? If so, what information should be disclosed and how or when that disclosure should take place? How are we to discern those conditions and boundaries?

Simply defined, transparency entails "openness," or honest and readily accessible information coming particularly from business and government entities (Rawlins, 2008, p. 6). Florini (2000) noted that "Transparency is the opposite of secrecy. Secrecy means deliberately hiding your actions; transparency means deliberately revealing them" (p. 13). Holzner and Holzner (2006) said that although it would be a mistake to equate transparency with democracy, the concept of transparency arose out of early democratic movements toward an "open society," and, in today's Internet era, pressures for transparency are not just American but global. They described transparency as "the social value of open, public, and/or individual access to information held and disclosed by centers of authority (p. 13). Lord (2006) similarly viewed the connection between transparency and those in power. She defined the concept as "a condition in which information about the priorities, intentions, capabilities, and behavior of powerful organizations is widely available to the global public … a condition of openness enhanced by any mechanism that discloses and disseminates information such as a free press, open government hearings, mobile phones, commercial satellite imagery, or reporting requirements in international regimes" (p. 5).

If transparency is equivalent to openness and honesty, it seems inadvisable to argue against this moral imperative. Indeed, in the most recent Edelman Trust Barometer (2010), "transparent and honest practices" was listed by respondents worldwide as the most important factor in organizational reputation—more critical than high quality products or services, fair prices, the way an institution treats its employees, its innovation and leadership, and its annual revenues or financial returns (p. 6). Furthermore, two-thirds of the respondents indicated that an organization needs to communicate information to them at least three to six times before they will "believe that the information is likely true" (p. 7). This indicates not only a widespread desire for open and transparent communication but also the need for that information to be disseminated in a continual flow. As Tapscott and Ticoll (2003) explained, "in a world where trust is in deficit [all stakeholders in society] have seized the tools at their disposal to shed the bright lights of transparency on the corporation like never before" (p. 10).

The world of social media exponentially increases the impetus for transparency. The Internet spreads information instantaneously to every region of the globe. Web sites, the collective actions of e-mailers and bloggers, videos posted on YouTube or other viral sites, tweeting and texting, and all other forms of real-time interactions expose thoughts and behaviors in historically unprecedented ways. All of this instant genuflection expands the information flow and renders it virtually impossible for any individual or organization to withhold information even when they would desire to do so. As Gower (2006) wrote, the Internet "has fostered a constant expectation of access (p. 92). Lord (2006) added that the Internet promises the potential for equalizing influence between organizations and individuals. "In an age of transparency, any organization or individual that can command broad attention and support has the potential ... to influence the relationship between people and information. Groups can marshal evidence and persuade people to change their minds," she said. "They can influence what people think is right or good and what sorts of behavior are appropriate" (p. 116). Because of this expanded openness through social information exchange and its potential outcomes, the idea of transparency has countless advocates, or "transparency optimists," as Lord (2006, p. 13) calls them.

Among the advocates for transparency are many scholars and practitioners in public relations. This should not be surprising, because long before the term transparency became a recent buzzword the public relations industry was, to some extent, advocating for open, honest communication between organizations and their various publics. Early in the 20th century, public relations advisor Ivy Lee developed a "new policy of information," declaring that his firm would not be a "secret press bureau" but would disseminate information in a factual, accurate manner (Bernays, 1988, p. 20). More recently, Newsom *et al*. (2007) characterized the more traditional imperatives of public relations: "The [public relations] practitioner ... distributes information that enables the institution's publics to understand its policies" (p. 2), dealing "with reality, not false fronts" (p. 3). This means, the authors added, that "[public relations] practitioners should never lie to the news media, either outright or by implication" (p. 3). While not specifically mentioning transparency, the intent of the authors reflected what is generally believed among public relations scholars—that it is not ethical for public relations practitioners to hide or obfuscate communication on behalf of their organizations.

In the past five years, the public relations industry has addressed the expanding concept of transparency—sometimes substituting the term with the word *openness* (Rawlins, 2008). One of the industry's strategic management publications, *The Strategist* (2005), for example, reported a study which concentrated on employee communication alone, but nevertheless indicated that employees prefer open and honest exchange of information, whether it is positive or negative. Last year, the Public Relations Society of America (PRSA) added a provision to its code of ethics that censures "pay for play." This is a tactic that, as PRSA Board of Ethics and Professional Standards chair Robert Frause explained, "Occurs when professionals make undisclosed payments to journalists or media companies to publish or broadcast a client's story, or when professionals allow placement of stories that appear to be earned media where compensation was provided in exchange for publication or broadcast" (*PR Tactics*, 2009, p. 1). In a specific attempt to encourage communication transparency, PRSA's new provision states that practitioners must fully disclose any such activities that result in editorial coverage.

A few public relations scholars have connected transparency with organizational trust. Gower (2006) reported that "corporate transparency is seen as a deterrent to illegal or unethical behavior" (p. 92). Therefore, "embracing the concept of transparency improves a company's reputation and helps restore trust" (p. 92). In an article focusing on stakeholder relationships, Jahansoozi (2006) noted that when trust in organizations declines due to crises or misbehaviors, that trust can be repaired with efforts of transparency that accept organizational accountability and promote cooperation with stakeholders. Rawlins (2008) explained that crises involving companies like Enron, WorldCom, and Arthur Anderson "resulted in a flood of demands for more transparency to restore trust in corporate America" (p. 2). And, he added, "To increase trust, organizations must be more open and transparent" (p. 1).

Rawlins (2008) offered a definition of transparency that highlighted the societal desires for openness. He described transparency as "the deliberate attempt to make available all legally releasable information—whether positive or negative in nature—in a manner that is accurate, timely, balanced, and unequivocal, for the purpose of enhancing the reasoning ability of publics and holding organizations accountable for their actions, policies, and practices" (p. 7). Such a definition suggests that attempts to make all "legally releasable information" available to are generally driven not by organizations which may automatically desire to release the information but by stakeholders representing broader societal virtues and holding the organizations accountable to those virtues. Still, despite these societal mandates for openness, organizations, and corporations in particular, are generally reluctant to disclose information (Fung *et al*., 2007). There is constant tension between the goals of society and of specific corporations operating within that society towards information and its dissemination. Lord (2006) explained this distinction between *voluntary transparency*, where organizations see the benefit of completely disclosing information, and *involuntary or forced transparency*, where society imposes the release of information through specific "investigative reporting by the global media or reports by NGOs" (p. 17) or through any one of the expanding social media outlets.

Sometimes when organizations do not satisfy societal expectations of transparency, governments create legislation to fulfill these informational needs. In this regard, Fung *et al.* (2007) characterized transparency as "mandated public disclosure by corporations or other private or public organizations of standardized, comparable, and disaggregated information regarding specific products or practices to further a defined public purpose" (p. 6).[95] They recounted several instances where governments have legislated what they call "targeted transparency" to protect segments of society from some form of potential harm (p. 2). After the deadly chemical accident in Bhopal, India, in the 1980s, the United States government required that manufacturers report every toxic pollutant released by each of their plants. Legislation passed in 1990 compelled food producers to include ingredient listings on packaging to inform consumers about potentially harmful levels of fat, sugar, and other nutrients. In 1996, three years after microbes invaded the water system of Milwaukee, Wisconsin, killing 110 residents and sickening 400,000 more, municipalities were mandated to start informing citizens of contaminants in their water supplies. And the list goes on (Fung *et al*., 2007).

Given examples of imposed transparency like these, it may be easy to conclude that organizations are simply being recalcitrant and thus such government action is necessary to protect society. As Lessig (2009) asked, "How could anyone be against transparency? Its virtues and its utilities seem so crushingly obvious" (p. 1). However, Lord (2006) argued that such simple judgments and frameworks are hallmarks of the transparency optimists. They examine all of the reasons why transparency is needed in society while simplifying or ignoring the complexities of transparency and possible reasons or situations when transparency may not be advisable. And Lessig (2009) added, "I have increasingly come to worry that there is an error at the core of this unquestioned goodness. We are not thinking critically enough about where and when transparency works, and where and when it may lead to confusion, or to worse" (p. 1).

Perhaps, then, rather than simply dismissing organizations as recalcitrant and self-serving, the question needs to be asked: Why might it be important to withhold information under certain circumstances? Certainly, as already shown, there are times when corporations, in particular, purposefully stonewall information at the expense of stakeholders who are negatively affected by subsequent corporate actions. Certainly, there are many observers who argue that it is the nature of corporations to want to work in secrecy. Yet, perhaps something more is going on related to this more complex nature of transparency. In fact, some authors argue that

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[95] The authors listed these characteristics of transparency as bullet points, but the wording is verbatim.

transparency is not as simple as being open and accurate in information. A search of scholarly and practical literature reveals circumstances in which any organization has a legitimate and moral responsibility to withhold information (Lord, 2006; Dezenhall, 2009; Lessig, 2009).

Much of the rationale against unfettered transparency centers not on any criticism of the concept, *per se*, but on weighing the virtues of transparency against other societal values, such as a person's right to privacy or the benefit of fair trade. Compromise between these virtues and transparency can be seen through government regulation and other means. For example, the Family Educational Rights and Privacy Act (FERPA) mandates that no information about a student can be made public without the student's permission (FERPA, 2010). The Employee Privacy Act also prohibits the disclosure of personal information to third parties without consent of the employee (Employee Privacy, 2010). To preserve fair trade, the U.S. Securities and Exchange Commission (SEC) requires regular release of information to investors and shareholders. However, the SEC prohibits disclosure during the quiet periods surrounding initial public offerings, as well as "insider trading"—giving information to certain individuals before public release so as to foster an advantage over other potential investors (Newsom *et al*., p. 186). Even the PRSA code of ethics requires "appropriate protection of confidential and private information" and counsels against leaking "proprietary information that could adversely affect some other party" or using "confidential information from your previous employer to benefit the competitive advantage of your new employer" (cited in Wilcox & Cameron, 2009, p. 78).

Other implications of transparency move beyond legal constraints and into the more ambiguous moral realm. Lord (2006) argued that information is not neutral and that sometimes, rather than adding to social discourse or protecting citizens from organizational misbehaviors, transparency fans the flames of mistrust and discrimination. She said:

> Greater transparency is not an unmitigated good…. Greater transparency can highlight hostility and fuel vicious cycles of belligerent words and deeds. It can highlight widespread prejudice and hatred, encourage victimization of out-groups and by showing broad acceptance of such behavior without repercussions, legitimize it. Greater transparency can undermine efforts at conflict resolution and, when conflicts do break out, it can discourage intervention by third parties. Transparency sometimes can make conflicts worse (Lord, 2006, p. 3).

Transparency also has the potential to permanently damage reputation—at times, even the reputations of those it is designed to protect. Lessig (2009) described a long-standing policy by *The Journal of the American Medical Association* (JAMA) concerning conflicts of interest between authors published in JAMA and the medical industry. This policy came about in part because, as Lessig noted, charges of failing to disclose such affiliations "is enough to stain a reputation. As with a charge of sexual harassment, the establishment of innocence does not really erase its harm (p. 1)"

Because of the potential of such charges to permanently damage reputations, JAMA put into place a requirement that anyone filing a complaint with JAMA about such a potential conflict must remain silent until the complaint was investigated. Late last year, however, an individual who filed such a complaint published his charges in another journal after waiting several months for JAMA to investigate. At that point, Lessig (2009) noted:

> "…once the story of JAMA's effort to silence a critic had been made public, that "gag rule" was of course doomed. After an internal review, the journal reversed its policy. Any effort to protect the accused against unjustified criticism was

> abandoned. Unfair complaints would have to be tolerated--as they would have to be in any similar context. The age of transparency is upon us. The need to protect the whistleblower is unquestionable--driving off even modest efforts to cushion the blows from a mistaken accusation" (p. 1).

A society that insists upon transparency also would do well to wrestle with the potential consequences of extreme information overload. What if all information were accessible to everyone at all times, from every possible source? The consequence of this could easily be a cognitive and practical nightmare for both individuals and society as a whole—ever more information piled upon people who already are overloaded by massive amounts of data. When scholars or practitioners advocate for full transparency, this factor generally has not been added into the equation. As Lord (2006) explained, "Humans often have trouble processing information and even more trouble processing large amounts of information…. Thus, even when the information we receive because of greater transparency is excellent and unbiased, we may not interpret it accurately. We may fail to recognize important information amid the 'noise' of constant information streams or we may fail to recognize its implications" (p. 11).

When people try to resolve these problems of information overload, they resort to their own cognitive perceptions to sift through the information. Each person does this through differing perspectives of culture, religion, personal experiences, and other factors. Therefore, the differing perspectives between the sources of information and their recipients also can cause problems for transparency. No matter how many facts or bits of information are offered to stakeholders, the individual's or group's frame of reference generally remains the same. Lord (2006) stated "We form theories about the way things work and we may resist new information that does not fit our preexisting views. Though these cognitive processes help us to cope with information and form opinions, they can also lead us astray" (p. 11). Newsom (2007) used the terrorist attack on the World Trade Center in 2001 as an example:

> … when people in other countries watched the televised attacks on the Twin Towers of the World Trade Center in New York, they interpreted the events in so many different ways …. Some were told, and believed, that this was a scene created by Hollywood as propaganda, and not real. Others who did accept what they saw on television as real thought all of the people in the towers were white Americans, probably Christians and Jews and thus persecutors of members of their faith, so this was in a sense deserved and perhaps an act of divine intervention. Some Caucasians who remember that Americans leveled their cities during World War II thought perhaps it was the USAs turn to experience such a disaster. Those who resent the USA's global leadership were not unhappy to see the giant attacked (p. 4).

Despite this potential for misinterpretation or misuse of information, there seems to be a widespread assumption that when organizations send out as much information as possible, this certainly will foster understanding and goodwill. Lord (2006), however, noted that there are circumstances in which people prefer to *not* have all the information that is available. As in the case of the health care debates, most citizens do not want all of the details of the deliberations—they just want a satisfactory solution to the spiraling costs and seemingly random implementation of insurance coverage. Similarly, in corporations, most employees do not expect to be involved in all managerial deliberations; they just want good decisions to be made.

Instances where perhaps too much information is doled out are not hard to find. Tapscott and Ticoll (2003) noted that "few companies publish financial reports that the average investor can readily understand, even less identify and interpret critical nuggets buried in footnotes. If anything, there is too much information, presented in a confusing manner. This is opacity in the guise of transparency" (p. 16). A stark example of these attempts to confuse occurred during the litigation around the Enron debacle, at which time the company produced *12 million pages* of information, according to the lead paralegal from a law firm spearheading efforts to develop a litigation support database. The paralegal reported that "The documents arrived in PDF format on hard drives with "no index and no organization" (CT Summation, 2009, p. 1). A final example of "opacity in the guise of transparency came last year when Kellogg Company gave a detailed explanation of its sudden shortage of Eggo Waffles, reporting that a rainstorm caused flooding in its Atlanta warehouse. But Kellogg's failed to state that the warehouse was first ordered closed by the Georgia Department of Agriculture due to possible food contamination. "In this case," said *PR News* blogger Scott Van Camp (2009), "Kellogg and Eggo got a pass" when neither the traditional nor social media challenged the explanation (p. 2).

In another example, in 2009, a teller at national banking chain insisted that a would-be robber show his weapon. When the intruder started to run away, the teller chased him down, tackled him, and called the local police. The teller was then fired for placing everyone in the lobby in danger. When questioned about the incident, the bank's spokesperson stated that the "highest priority is to protect the safety of our employees and our clients .... Our policies and procedures are in the best interest of public safety and they're consistent with industry standards" (CNN, 2009, p. 1). Certainly an industry policy that prioritizes lives over money is admirable, but to reveal the policy in the national media could serve as a "transparent" invitation to all potential robbers to enter a bank and get away with a crime. This perhaps undermines the very safety of bank clientele that the spokesperson desired to protect.

A final concern about complete transparency that the literature revealed is its potential to stifle situations where honest deliberation is critical. A stark example of this came after the recent health debates in the U.S. Congress had ground to a rancor-induced stalemate. President Barack Obama called for a summit on the issue and decided to fulfill a campaign promise to televise the debates in the name of transparency. While the summit seemed to proceed with civility and respect, senior public relations counselor Roger Bolton (2010) argued that perhaps more could have been accomplished without public scrutiny:

> I suggest you might want to try to have some of these conversations behind closed doors. (I know, we're all for transparency, but a little secrecy won't hurt as long as no back-room deals are cut. With the cameras turned off, maybe you can make some quiet attempts to find a little common ground – something that can best be done without the posturing and the talking points) (Bolton, 2010, p. 1).

To this point, then, while agreeing with the basic principle of transparency, we have tried to show the problems inherent with unrestrained transparency. In some regards, this reluctance to fully advocate transparency represents the difference between what J. Grunig and White (1992) would call the normative ideal of complete disclosure versus the practical and sometimes moral realities of the construct. There certainly is a need to draw more useful distinctions between the majority of occasions when full transparency is desired and those occasions where it may not be appropriate. Therefore, we embarked on this study by conducting in-depth interviews of identified experts in the arena of communication or public relations.

As mentioned in the introduction, we set out to address three main questions:

Question #1: Under what specific circumstances is transparent communication necessary and beneficial?

Question #2: When is it better to not disclose information, even given today's expectations of instantaneous, complete messaging?

Question #3: In which situations does absolute transparency actually harm stakeholders and societies?

Research Method

Having established the theoretical framework for these questions, the authors of this paper decided to pose them to a group of nine senior public relations professionals. We approached an examination into the questions qualitatively because theory-building in the area of transparency has been relatively sparse; therefore we believed that attempts to understand the construct are still exploratory in nature, and therefore qualitative research is appropriate (Pauly, 1991). Because we sought from the outset to interview highly respected professionals in the field (most of these respondents have been serving as authors, consultants to executives of major firms, or both), we believed that nine interviews would provide the requisite data to satisfy reliability in a qualitative study. The interviews we conducted were designed to address the theoretical assumptions of this paper and to better understand the practical applications and potential limitations of transparency in the practice of public relations.

One important aspect of a qualitative investigation is that it allows data to emerge from those who are being studied, rather than having perspectives imposed upon the sample. While the authors of this paper did enter the research believing that there are holes in the argument of unquestioned transparency, it was important to gather data as objectively as possible—to allow for contradiction to our own worldviews. Each of the interviews unfolded over an average of about 40 minutes. Some of the respondents generally had strong opinions in favor of transparency, others had considerable concerns about the concept and its application, and some sat clearly in the middle of the spectrum. Nevertheless, as the interviews proceeded, ample information was revealed that provided support for, contradiction toward, and further enlightenment of the concept of transparency.

Interviews and Observations

In all nine of our interviews, the themes of ethics, honesty, and responsibility to share information with the public were expressed and regarded as being highly important. At the same time, all the professionals interviewed had experienced distinct limitations to the traditional doctrine of transparency and the ability to invoke it all of the time in a real-world environment. Results of these interviews, including specific relevant quotes from some of the interviews, are included in the pages to follow. It is important to begin with why the respondents viewed transparency as crucial in today's society, and then there will be subsequent discussion on the practical and ethical limitations of the concept.

The Imperative for Transparency

The professionals who were interviewed generally agreed that the notion of transparency —and the increasing pressure on society and its various organizations to become and remain more transparent—has been accelerated due to modern technologies such as the Internet and social media. They also concurred that the concept is here to stay. “More and more,” one of the respondents explained, “it’s not as hard to convince people that they need to be transparent, to the degree that it’s appropriate.”

Many of the individuals interviewed also linked the concept of transparency to honesty and to professional and organizational ethics. Despite the complications and dilemmas sometimes presented by completely transparent behavior, the large majority of the interviewees agreed on and cited specific circumstances under which transparent communication is necessary and beneficial for society. Said one professional, **“**A fundamental principle is never to mislead. Be as honest as you can under the circumstances that you face…and it should be the same thing for organizations.” Another added that, “Transparency is important in acknowledging and responding to stakeholder concerns.” And, an additional comment was made that, “We need to get out of the paradigm in which organizations thought they controlled everything.”

This demand for honest, open communication is particularly important in times of crisis or negative publicity. One respondent explained, “When there are gaps in the correlation between what is wrong and what you tell people about how you’ll fix it, that’s when transparency comes into play. The advice is, **‘**Don’t keep your secrets. Share.**’** The world knows better [than to purposefully withhold information]—especially this generation of workers who will be taking over the boardroom in a few years.”

Limitations of Transparency

At a fairly early point in each of the eight interviews, however, the limitations of transparency—and of creating or maintaining an organizational policy of providing information to all parties at all times—were identified and described. Analysis of the responses revealed a distinct pattern for these limitations of transparency. They fall into five categories.

1. Transparency is not the same thing as truth.

All the senior public relations professionals agreed that the primary objective of transparency should be to get at the truth. They all also agreed however, that in actuality transparency reveals *fact* much more often than it reveals *truth.*

One interviewee used this example: Suppose that Joe is applying for a job and the hiring manager contacts Joe’s former boss for a recommendation. In response to an inquiry about Joe’s overall performance, the former manager explains that Joe was always on time, that he didn’t shout at work, and that the manager never smelled any alcohol on Joe’s breath. It’s highly unlikely that Joe or any other job candidate (or hiring manager) would be happy with a reference like this, because, while every statement is true, each can also cast a false or negative light. The problem with transparency, said the interviewee, is that “each statement was a fact, but collectively it was not the truth. And the danger is that some might take transparency for truth, when in fact, it’s only fact.”

2. Perspectives on transparency can vary significantly from culture to culture.

This area was one that epitomized the way in which, in a qualitative study, data can emerge from the respondents. Other than the notion discussed briefly in the literature review, that information is viewed from differing perspectives, the authors had not considered the cultural variations on transparency until the interviews were conducted. A few respondents emphasized the salience of these cultural differences, explaining why transparency is valued so much more among groups in the United States than in other countries or cultures.

As an example of this, one interviewee from Japan distinguished between the Japanese view of transparency and how it is seen in the United States. The respondent referred to the historical melding of many cultures within the U.S., a melding which has created the "low-context" environment described by Edward T. Hall (1976). A hallmark of this low-context culture is the need for precise words and information in order to negotiate and clarify the differing meanings between the various cultural perspectives. Such an environment fosters demands for transparency. A respondent from Australia added, "The U.S. is a melting pot—transparency is more important because there is no dominant culture. It's such a melting pot that people might not understand you unless you disclose everything." By contrast, in historically homogenous, high-context cultures such as Japan, meaning and understanding takes place implicitly in interactions, without a need for many words and much precision. Therefore, not only is there little desire for transparency but also considerable puzzlement in many cultures over why Americans place such great value on the concept.

The same interviewee from Australia also raised the notion that many of these differing cultural views of transparency are embedded in a fundamental difference in the "shame-faced" approach of many other cultures versus "guilt-based" approach of American culture. The individual explained, "In other cultures, values such as dignity of the individual (the avoidance of shame) have a much higher value that they do in a "guilt space" culture like the U.S." Consequently, the preservation of such individual dignity may trump the expectation of total and complete transparency in a given situation."

3. ***Transparency may not be the best ethical or emotional choice.***

Although the idea of transparency is strongly linked to ethics, the results of the field professional interviews raised the idea that complete transparency may not always be the best ethical decision. In some cases, for example, the prevailing ethical consideration may be privacy issues, not transparency. Said one interviewee, "There are things you don't say yet, things you don't tell some people at all. Use ethics principles to guide your selection." By not revealing the identities of deceased persons, for example, organizations are operating out of consideration for their families—and it is obvious what devastating consequences may occur when this type of information is revealed too quickly. In a workplace environment, managers don't share information about employees' performance or salaries with fellow employees or external publics. If they do, they risk creating embarrassing rivalries and morale issues.

At times, the motives for withholding information can actually be altruistic. One professional relayed an example that occurred when a business was considering closing some of its manufacturing facilities. During the time the company was evaluating which facilities to close (a fact known to the public), employees would often ask, "Will my plant be closed?" Even though management had a fairly good idea at the onset which plants might close, they waited until the complete results of the financial analysis were available before making the final decision and answering that question. A traditional definition of transparency might have dictated that management offer its best guess as to which plants would close, even before making the final decision. However, noted the interviewee, in this case it was determined that the best ethical decision was to refrain from such an announcement—in part because an advance knowledge of the plant closings would have enabled competitors to stir up "no confidence" fears among customers and seize the business—thus costing more employees more jobs, more quickly, than the closing process would have otherwise inflicted. It also would have stirred up an even greater amount of emotional stress among those who would not have needed to worry.

Another interviewee noted that it depends on the motive. If a company's motive for not disclosing is that it hasn't made a decision yet (*e.g.*, the business knows it's considering pulling its operations out of a specific community), it would be inappropriate to notify *any* of the affected stakeholders until a decision is made. "However," he continued, "there might be a case for transparency at that point if your motive is to encourage the local community to provide incentives that would make it more financially viable for you to stay."

4. ***Transparency—when it provides information that is incomplete or out of context—can diminish, rather than improve, understanding and effectiveness.***

Some professionals felt that information offered in the name of transparency, particularly when overwhelming and under-explained, served to obfuscate rather than clarify issues and facts. This concern is reflected in a blog written by a humanitarian aid worker. While this writer was not one of the nine individuals interviewed for this article, the examples concerning the results of transparency without context are instructive.

> It [transparency] will not result in more effective, more efficient aid. On more than one occasion I have seen unfiltered program performance and financial data in the hands of people not trained to understand it is completely misunderstood [sic]. The results in all cases amounted to long, costly and tedious distractions for my employer at the time. The amount of staff time and level of effort expended in one instance to placate a self-righteous reporter who failed to properly understand the meaning of the term "audit" was immense and in the end lowered program quality. In another instance, the level of effort required to convince a wealthy but clueless supporter that a FAX machine for the field office (this was in the days before email) was a reasonable cost to incur under a "miscellaneous office equipment" line item, when we costed it out, was more expensive than the FAX machine that had caused the uproar to begin with. In both instances (and a great many others) transparency unaccompanied by discreet selection or filtering of information led to diminished effectiveness and efficiency.

The underlying concern in this situation seems to be that, once presented with a plethora of information, key publics may decide that is *all* they need, and work directly to a conclusion that may turn out to be inaccurate. In other words, as noted in the *Journal of the American Medical Association* instance cited earlier (Lessig, 2009), transparency sometimes becomes about volume and speed of information—not quality of information. One professional explained: "Employing organizational thought to arrive at the right conclusion will cause people to think broadly. But with transparency, you go to the single, most obvious option."

Several interviewees stated that one way to avoid the trap of "leading the witness" by providing seemingly-comprehensive (but actually incomplete) information is to make a greater effort to determine what the audience needs to know, in advance of the communication. One respondent remarked that, "Most PR people think transparency is 'You've always got to tell the truth.' That's not what transparency is. It is nothing more than Jim Grunig (1992) said years ago—transparency is the symmetrical form of communication—you listen, adjust, listen again, and adjust again."

5. ***An attitude of authenticity is more important than an act of transparency.***

The professionals interviewed agreed in general that a "technical" compliance with transparency (*e.g.,* producing large volumes of uncontexted documents in response to a request for information) is not helpful in establishing long-term trust with stakeholders. In such cases, the act of communicating may leave the stakeholders feeling that their needs weren't considered at all. Consequently, while the approach might have been very transparent, it was not at all authentic—and, said the professionals who were involved in this study, authenticity counts the most when trying to build trust.

One professional recalled a situation in which an organization was forced to confront a scandal involving an employee. The organization went into what the respondent called "full transparency mode," turning the investigation over to an internal management team who already had an axe to grind with the employee in question. The interviewee reported that the investigation was extremely one-sided, with no clear messaging or communication strategy from management. This led to greater confusion and anger among employees and diminished credibility for the management team.

The key to achieving authenticity, according to several of the professionals interviewed, is not only to talk, but to listen—and then adjust when appropriate. The power of authenticity lies in the fact that the communicator listens to feedback from stakeholders—and demonstrates to those stakeholders that what they said matters. Noted one senior manager: "We have a tendency to do too much talking and not enough listening. Management tends to have biases in terms of how they think people feel about things—and more often than not, they're a little off-kilter..." The interviewee went on to explain that, "The difficulty is changing and adjusting based on what you hear. That's where it falls apart—because management doesn't always accept and act on that."

Based on the patterns in these responses, it is apparent that the concept of transparency needs more clarity. The data has led us as authors to an expansion of the definition and a new term to more comprehensively address the concept: the translucency corollary.

Towards an Expanded Construct: Translucency

Given these observations around the three questions posed in the study, we turn to establishing this modified framework for communicating openly, honestly, and ethically with stakeholders. As noted earlier in the paper, we propose that a stance of *translucency* may be more appropriate in certain circumstances. As a means of light conduction, translucency occurs when the light passes through a medium, such as frosted glass, in sufficient quantity that the viewer can discern the outline of objects and see in which direction they are moving, but they are not completely visible to the eye.

With this article providing parameters under which translucent communication must take place—and why—organizations can offer an outline and shape that will ethically inform, guide and engage key publics, even when full disclosure is not the best option. In this respect, the notion of transparent light conduction shares several key characteristics with translucent communication in organizations:

- It is based on the premise that there will be some line of vision or illumination into the organization.

- The purpose of the translucency is to provide sufficient illumination to guide and inform the external audience ("Is anyone home here?") while maintaining a position of prudence and mutual respect between the parties (safety, privacy, etc.)

- There is sufficient illumination to determine basic organizational action responses and directions (the shapes can be seen moving through the glass pane.

- When circumstances dictate, the line of vision can be expanded into a more transparent view (*e.g.,* the door can be opened).

In addition to expressing the need for translucency, this paper further proposes several key considerations under which translucency can and should occur when organizations are building relationships with their key publics—not in any effort to hide information, but to reveal it at the right time and under the right circumstances:

1. ***Translucency is a commitment to communicate with stakeholders—not an advance commitment to what that communication will contain****.*

Committing to communicate with stakeholders doesn't promise a particular volume or content of information; it is simply a promise that, as one interviewee noted, "We will tell you as soon as we know the answer, we'll tell you the answer and the implications for you. The commitment is, I will engage and understand your needs. When we have the information you need—when it is accurate, stable and actionable—we will open the door."

2. ***Translucency occurs only when credibility has already been established.***

Communication is a two-way street—light must be conducted through both sides of the glass. In communications relationships, translucency—a state in which the basic outline and intent of actions is clear, though all the details may not be so clear—can work only if the perceiver of the actions trusts the sender and believes that sender has their best interests at heart. The higher the trust level in these situations, the greater the acceptance of a lack of specific detail. One respondent to the study, a professional who is highly experienced in crisis communications, noted that this trust is often the force that preserves stakeholder relationships even when little information is available. And to have trust and translucency, organizations must be willing to step up and acknowledge this. Says the interviewee, "In the event of a rail accident that releases a hazardous chemical, for example, perhaps all the company can say is, 'We can confirm there's a release. We don't know much. But we'll give you more information as we have it.' There is always a need to converse with stakeholders."

3. ***Translucency might be most effective when there is reason to believe that an organization's arguments and data are rock-solid, but not persuasive.***

A translucent approach is common-place in the arena of issues communications, where the information being communicated can often be associated with fear, confusion, or lack of understanding. One professional in our study described the process of sensitive communication in this way: "Communicating scientific information to a lay audience requires that you not get into all the details of the science, which might be required in transparency. But what if seven research studies support that the product is safe, and one raises questions? What is the most accurate way to portray this in a balanced way? Rather than listing all the details of each study, the most effective and translucent approach might be to say, 'The weight of the evidence' or 'the totality of the science' supports this or that. Then if someone wants more, you'd go to another layer of information."

4. ***Translucency is most effective when an organization already has in place a process and structure for bringing more light of information through the glass.***

Organizations which are striving to maintain translucent communications with their stakeholders will likely succeed only if they have built up a trust bank based on past communication behavior—in other words, if they have responded promptly and openly across all levels over an extended period. This organizational predisposition to openness can, according to one respondent, be assessed by asking a few key questions:

- Is the CEO accessible and communicative?
- Has the company shared a clear vision?
- Is the organization precise (rather than vague) in its communications? As one interviewee admonished, "Deliver the right amount of communication. If you make too much information visible, it dilutes the power of your message. Openness has to cut both ways if it is going to work."

It is important to note here the role that precision *in* or *of* communication plays in this process. Traditionally, transparency is equated to volume of information offered—the more information we provide, the more transparent we are. The translucency corollary, however, espouses the idea that it is the *quality* of information—not necessarily quantity—that counts. The corollary further proposes that it may often be better for both sender and receiver to wait longer and receive less information at the outset if that information can be more precise and accurate as a result.

Conclusion

As in any balancing act between scholarship and practice, there is always a tension between the normative and practical reality. Normative theory proposes what would be the ideal in any given situation, or how it should be. Practical reality, of course, represents what is actually happening within society or in an organization (J. Grunig & White, 1992). Both of the authors of this paper had been involved in practical implementation of public relations for more than two decades before joining the academic ranks full-time. When introduced to the scholarly writings on transparency, it seemed to us that certain practical realities were not being addressed, that some of the nuances behind the imperatives of transparency had not been explored. Therefore, we determined to explore these nuances so as to provide a more complete understanding of the concept of transparency and to offer practitioners are more comprehensive and accurate roadmap for performing their daily duties.

As mentioned earlier, the purpose of this paper was to address three main research questions: (1) Under what specific circumstances is transparent communication necessary and beneficial; (2) When is it better to not disclose information, even given today's expectations of instantaneous, complete messaging; and (3) In which situations does absolute transparency actually harm stakeholders and societies? From the literature review and the interviews of nine senior professionals in the communications industry, we should have shown that transparent communication is indeed beneficial in theory and in most circumstances. We also indicated, however, that there are situations where completely transparent communication has its limitations and negative consequences on both organizations and stakeholders. The interviews and the literature also brought forth some specific examples of harm that can come when transparency is misapplied.

Why a *Corollary* Instead of an Alternative Theory?

In developing this paper, we did not set out to demolish the importance of transparency; we believe that the necessity of open, honest communication is indisputable in public relations. However, the term should not receive a free, unquestioned ride. While transparency is needed in the large majority of situations, public relations scholars and practitioners can gain much greater benefit by understanding what is meant by the term, when it is most appropriate, and under what circumstances complete openness, or "spilling all the beans," may not be appropriate at all.

In datasegment.com (2010), a *corollary* is defined as, "Something which follows from the demonstration of a proposition; an additional inference or deduction from a demonstrated proposition" (p. 1). A corollary, then, might be observed as a certain Proposition B flowing out of an original Proposition A, but instead of forging an outright denouncement of the original theory the corollary could be considered a secondary element offering added insight or expansion to the original. In this case, then, it is possible that *transparency* is Proposition A, and *translucency* serves as a Proposition B which sheds more light, as it were, on communication transparency rather than replacing the theory altogether. As a result, we have selected the term *corollary* as appropriately clarifying the original concept of transparency.

This is not dissimilar to the evolution of media issues and agenda theories. McCombs and Shaw (1972) introduced *agenda setting* theory, which proposed that the media do not tell us what to think but what to think about—that by reporting certain issues, media set the agenda for public debate and subsequent action. Lang and Lang (1983) then determined that "the original notion of agenda setting needed to be expanded" (Severin & Tankard, 2001, p. 230)—that the original idea did not explain what really occurs thoroughly enough. They proposed a theory of *agenda building*, "a collective process in which media, government, and the public influence one another in determining what issues to be considered" (Severin & Tankard, 2001, p. 230).

Lang and Lang (1983) apparently did not sense any need to dispute or overturn agenda setting theory; rather, they strengthened the research and propositions behind the theory so as to further clarify and expand the concept of agendas in society. That is what we have attempted to do with the translucency corollary—not to displace the original theory of transparency, but to enhance and to clarify it. With this paper providing parameters under which translucent communication must take place in given circumstances—and why—organizations can offer an outline and shape that will ethically inform, guide, and engage key publics, even when full disclosure is not the best option.

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