

# Investigating Transparency in Corporate Discourse about Safety

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## Keywords

Corporate communication

Transparency

Sea transport industry

Webpages

CSR reports

## Abstract

Transparent communication is key to corporate reputation. Although greater public awareness has obliged firms to take a more proactive approach to transparent communication and disclosure, transparency remains an elusive concept and difficult to verify. This paper explores the characteristics of language which can act as indicators of transparency and focuses on the information about safety at sea provided by cruise and ferry operators in the relevant sections of the companies' websites and their corporate reports. Following Schnackenberg and Tomlinson's (2016) classification of the three dimensions of transparency, namely Disclosure, Clarity and Accuracy, the analysis adopts an eclectic, primarily qualitative approach to identify the linguistic and rhetorical features that contribute to or hinder transparency. The study takes into consideration the cognitive strategies adopted in the transfer of specialised and technical knowledge from expert to non-expert, which may give insight into the way information is rendered understandable and hence more transparent from the point of view of clarity. Another line of analysis is the use of vagueness, which could appear to move the discourse in the opposite direction, towards ambiguity, or even opaqueness. Whilst various rhetorical devices, such as cognitive strategies and FAQs, are found to enhance transparency, vagueness and highly evaluative language, typical of corporate communication, may impair it. The overall results of the analysis suggest that it is easier to identify the characteristics of the lack, rather than the presence, of transparency.

## 1. Introduction

Transparency is said to be “one of the most cherished and celebrated, yet unquestioned, ideals and aspirations of contemporary society” (Christensen and Cheney 2015, 70). This is true in many walks of life, not least of all in business, where transparent communication is key to the reputation of a company. The numerous corporate scandals of recent years leading to greater public awareness have obliged firms to take a more proactive approach to transparent communication and disclosure in order to win, maintain or enhance stakeholders' trust in their operations (Rawlins 2008).

As companies nowadays make full use of the multiple Internet affordances for their corporate communication, this may give the impression of greater transparency (Coombs and Holladay 2013). However, transparency cannot simply be equated with more, easily accessible information. Any investigation into transparency needs to go beyond this parameter and consider the quality of the information being provided, though this in itself is difficult to assess. The very nature of corporate communication may indeed hinder transparency, with the well-established practice of creating an extremely favourable image in the eyes of stakeholders through positively framed discourse (Entman 1993); performance-related information is given together with self-promotional and reputation-enhancing statements on the company's policies and activities (Breeze 2013). Furthermore, the pursuit of transparency may be undertaken for ethical reasons, but it may also have a more pragmatic motive, the business case, whereby a responsible image is projected to respond to stakeholder expectations (Seidlhofer and Tolstoy 2022). Whatever the driving force, transparency remains a rather elusive concept and in practice difficult to verify, because it is, in fact, a multifaceted notion.

Many scholars from a variety of disciplines, such as business, marketing, public relations, management and organisational communication, have highlighted the various components of transparency in the attempt to identify and define what it actually is and its purpose (Fisher and Hopp 2020; Wehmeier 2018; Ball 2009; Rawlins 2009). In their review of the literature on transparency, Schnackenberg and Tomlinson (2016) gather the various terms and their meanings that previous studies had identified as elements of transparency and integrate and classify them into three dimensions, namely disclosure, clarity and accuracy (Schnackenberg and Tomlinson 2016, 1785). Although there appears to be a general consensus on the principles of transparency, they are abstract concepts which begs the question of how we can recognise whether communication is transparent. In this exploratory study we try to identify the characteristics of language which can act as indicators of the degree of transparency in corporate communication.

The focus of the study falls on the topic of safety in the sea transport sector. Safety is clearly a fundamental question for the industry, especially in view of dramatic and often tragic events that have occurred over the years involving ferries and cruise ships. Suffice it to mention the Italian case of the Costa Concordia tragedy in 2012 and the more recent emergency of the Covid-19 pandemic that saw hundreds of guests on cruise trips trapped on board, in isolation and unable to disembark anywhere.

Safety is a complex matter that covers a number of aspects, each with its own issues and competences. It obviously concerns the safety of the vessels themselves, that is their seaworthiness. Another area coming under the umbrella term of safety is security, which can involve situations ranging from criminal offences and disturbances on board to potential

terrorist attacks. Safety can also be viewed in terms of health problems that may arise on a more individual level, with passengers who have chronic conditions or a sudden need for medical care. Yet another area concerns emergencies, whether they be medical, equipment failure, fire, weather conditions and so on, all of which the company needs to show it is ready to deal with. In sum, safety is a question that directly affects a number of stakeholders, employees, customers, passengers and indirectly other stakeholders such as investors.

By focusing on a specific and circumscribed topic like safety, it is hoped that the close analysis of texts will enable us to explore the various ways transparency, or lack thereof, may be conveyed. The paper is organised as follows: the second section discusses the multiple facets of transparency that need to be considered as proposed in the literature. Section 3 presents the data and methodology used in the analysis, whilst the fourth section presents the results. The final section discusses the findings and tries to draw some preliminary conclusions on the linguistic characteristics of transparency.

## 2. Theoretical background

Transparency has long attracted the attention of scholars, although the search for a satisfactory definition of the concept has been arduous. It first became a catchword in the fields of political and financial disclosure to aid stakeholders in their understanding of organisations and consequently make informed decisions. Ball (2009) gives what she calls a post-modernist definition of transparency in public administration and policy through the three metaphors of openness, accountability and efficiency. The focus is on how organisations and government can or should create transparency to increase the trust of the public. Indeed, Rawlins (2008) emphasises the close connection between transparency and trust. A broader definition of transparency was proposed many years earlier by Heise (1985, 209, cited in Rawlins 2008, 6), who identified its basic principles as making “available publicly all legally releasable information – whether positive or negative in nature – in a manner which is accurate, timely, balanced, and unequivocal.” Together, these definitions include the most important, or at least the most frequently mentioned, characteristics of transparency in the literature.

More recently Wehmeier (2018) presented an overview of the concept of transparency which critically evaluates the different approaches that have been adopted in dealing with the topic. The first is the functionalist approach which focuses on transparency as information giving, which should lead to better understanding of an organisation by the public and therefore greater trust. However, Wehmeier is critical of this approach as it follows “a linear sender-oriented perspective” (Wehmeier 2018, 1659) and fails to consider the communicative

interaction between sender and receiver. The second approach adopts an interpretative perspective which fills this gap and centres on the importance of the receiver's understanding of transparency. Here the emphasis is not just on the availability and openness of information but also on the quality of the communication, which must be related to the receiver's ability to process and understand it. This may be better achieved if both parties actively participate in the acquisition and creation of information through collaboration, thus making transparency a process that can enhance the relationship between the organisation and stakeholders. The third approach highlighted by Wehmeier is the critical approach, in which transparency is viewed as a challenge to organisations. Too much openness and too much information will not automatically lead to greater understanding and trust among stakeholders and may actually create risks for the organisation. In any case, stakeholders view transparency from different points of view and with different expectations and trying to find the right balance to satisfy all is a challenge for companies.

The study by Schnackenberg and Tomlinson (2016) seems to capture the essence of the three approaches. Their definition of transparency as "the perceived quality of intentionally shared information from a sender" (2016, 1788) implies the relational aspect of transparency between sender and receiver, as well as other factors, including the amount and quality of the information being communicated. The scholars draw on previous studies of transparency and identify three essential dimensions of transparency, namely disclosure, clarity and accuracy, stating that, "together they provide a parsimonious foundation upon which to study transparency" (2016, 1791). Their work has, in turn, inspired more recent studies on transparency (Seidlhofer and Tolstoy 2022; Higgins, Tang and Stubbs 2020).

Disclosure refers to the availability and accessibility of information as in the functionalist approach, though Schnackenberg and Tomlinson point out that quantity is not necessarily a guarantee of true transparency. Indeed, Coombs and Holladay suggest the "idea of information sharing is deceptive" (2013, 218), as too much information may lead to "obfuscation" (Fisher and Hopp 2020, 205) with an overload of information impeding an adequate assessment and evaluation of it. Careful consideration must be given also to the most important information to disclose. Relevance therefore becomes a significant feature. It should not be viewed simply as sender-oriented, that is the intent to communicate transparently. The true mark of success lies with the receiver/addressee who perceives the transparent quality of the information received. The information provided must be adjusted and finetuned to the needs of the target audience, whether internal or external to the company or both, so that readers can find what they actually want or need to know. As Fisher and Hopp (2020, 206) stress, transparency is thus a two-directional phenomenon.

The second dimension concerns Clarity, the understandability and coherence of the information being disclosed, with particular attention being given to the use of complex, highly-specialised technical details that will be unintelligible and confusing to the non-expert. Here the focus falls on the linguistic resources and devices used to accomplish “the seamless transfer of meaning from sender to receiver” (Schnackenberg and Tomlinson 2016, 1793) and thus guarantee the complete comprehension of the communication.

The third and last dimension, Accuracy, has to do with the correctness and reliability of the information, which may be difficult, if not impossible, for the receiver to evaluate. Although corporate communication is of course what Coombs and Holladay refer to as “self-interested discourse” (2013, 218) and transparency can be considered as a form of strategic communication (Fisher and Hopp 2020, 204), Schnackenberg and Tomlinson stress the importance of Accuracy because “purposefully biased or unfoundedly contrived” information is not transparent (2016, 1793).

This exploratory study is purely linguistic and will not attempt to test the validity and reliability of the information provided by the companies. It will try to identify some of the characteristics of the language used in texts that may indicate the degree, or lack, of transparency. It draws on the three dimensions proposed by Schnackenberg and Tomlinson (2016), as they can suggest some of the linguistic and rhetorical features that may contribute to or hinder transparency.

### 3. Corpus and methodology

The corpus consists of cruise and ferry operators’ website pages dealing with the question of safety (downloaded in January 2024) and the relevant sections of the most recently available corporate Reports (Sustainability, ESG or Annual) of a selection of ferry and cruise operators (see Table1).<sup>1</sup> Both types of companies are involved in travel by sea but differ insofar as cruise operators are closely, perhaps primarily, considered as part of the tourism industry, whilst ferry operators, also associated with tourism, provide services for non-leisure travelling and in the field of logistics and freight. Furthermore, whilst cruise operators are global

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<sup>1</sup> Companies produce different kinds of reports, each with its own focus. An Annual Report is a factual account of a company’s activities in the financial year and its business results. While sustainability and Environmental, Social and Governance (ESG) are closely related concepts, they have distinct focuses. A Sustainability Report records the commitments and activities of a company as regards environmental and social issues, targeting a broad audience of stakeholders, from customers to employees or anyone interested in knowing about the company’s sustainability strategy. A ESG report discloses data using specific criteria addressing a more specialised audience, namely investors by providing a risk profile of the company. However, apart from Annual Reports, companies in some geographical areas are not obliged to produce Sustainability/ESG reports. Therefore, for the purpose of this study we had to use the reports, irrespective of type, available for 2022.

multinationals because of their size and the scope of their business, ferry companies operate on a more local basis and are often small operators which do not publish sustainability reports or have only a small website to sell tickets without giving much, if any, information about the company. In Europe, however, there are quite a few larger companies providing both website information and Corporate Social Reports and therefore only European ferry operators were included in the corpus.

Websites	Tokens	Reports	Tokens
<b>Ferry operators</b>			
DFDS Seaways (Denmark)		ESG Review 2021	
ForSea ferries (Sweden)		Sustainability Report 2022	
Grimaldi Lines (Italy)		Sustainability Report 2022	
Irish ferries (Ireland)		Annual Report 2022	
Moby Lines (Italy)		-	
NorthLink ferries (UK)		-	
P&O ferries (UK)		ESG Report 2022	
Stena Line (Sweden)		Sustainability Report 2022	
Tallink (Estonia)		Sustainability Report 2022	
Viking Line (Finland)		Sustainability Report 2022	
<b>Cruise operators</b>			
Carnival Cruise Lines (USA)		Sustainability Report 2022	
Costa (Italy/USA)		Sustainability Report 2021	
Fred Olsen (UK)		ESG Report 2022	
Disney (USA)		CSR Report 2022	
MSC (Switzerland/Italy)		Sustainability Report 2022	
NCLH Norwegian (USA)		ESG Report 2022	
Royal Caribbean (USA)		ESG Report 2022	
Viking cruises (USA)		-	
	<b>29,956</b>		<b>20,173</b>

**Tab. 1:** Corpus

Reports and websites are two very important channels of communication for companies to showcase their operations. Reporting is a highly institutionalised genre subject to internal regulations and guidelines as far as its structure and content are concerned, whereas corporate websites, though a well-established genre, allow greater opportunities to organise information in different sections of the website and exploit the different affordances available on the Internet. At times there may be an inevitable overlapping of the information provided in the two genres, but it may also diverge considerably (Koskela, Enell-Nilsson and Hjerppe 2023). This will depend on a number of factors, including the different targeted audiences of the two genres as well as specific contextual circumstances such as regulations and recent events influencing the focus of information. Although there are fundamental differences between the types of reports in the corpus, for the purpose of this study, and given their availability, they will be treated as representing the report genre.

As this is an exploratory study aiming to identify the linguistic and rhetorical characteristics of transparent, or inversely non-transparent, communication, it has followed an eclectic approach to capture its various facets as outlined by Schnackenberg and Tomlinson (2016). The approach that has been adopted is basically qualitative, though the corpora have also been run through AntConc to support the analysis. The study will also take into consideration the cognitive strategies adopted in the transfer of specialised and technical knowledge from expert to non-expert, which may give some insight into the way information may be rendered more understandable and hence more transparent from the point of view of clarity. These strategies are generally grouped under Illustration and Reformulation strategies (Calsamiglia and van Dijk 2004; Ciapuscio 2003; Gülich 2003). Illustration strategies, namely description, definition, exemplification, scenario, metaphorical language, and concretisation, are verbalisation strategies chosen by writers/speakers according to the context, the purpose and the interlocutors. Reformulation strategies change or modify what has been said to clarify the meaning and make it more comprehensible. In written texts, reformulation strategies aim to pre-empt any misunderstanding or difficulty in understanding. These strategies are repetition and paraphrasing.

Another line of analysis to be followed for Clarity is the use of vagueness, which could appear to move the discourse in the opposite direction, that is towards ambiguity, even opaqueness. Vague language can be expressed through many linguistic categories and is pervasive in natural language. Jin's (2022) study of CSR reports suggests that vague language is used in expressions related to quantity, degree, time and softening of stance positions and is adopted to achieve specific communicative purposes, which the author identifies as providing an appropriate amount of information, enhancing persuasion and self-protection. Zhang (2018, cited in Jin 2022, 81) notes that vague language is unspecified and context-sensitive. Vagueness can be used unintentionally or as a deliberate rhetorical strategy, perhaps to skirt controversial, troublesome or image-damaging matters in the case of corporate discourse.

## 4. Analysis

The analysis follows the three dimensions illustrated by Schnackenberg and Tomlinson (2016), as described above.

### 4.1 Disclosure

The first stage of the study focused on the level of disclosure practiced by the various companies in their websites and reports. Accessibility, intended in the sense of how easy it is to find information, is an obvious, but essential step in transparency. On the cruise operator

websites, it was usually necessary to scroll down to the bottom of the page to find links to the topic under headings such as *Safety and Security*, *Health and Safety*, *Safety information*. However, the headings were not always explicit; for example, on one website, the information was found under *Useful information* (Costa). It was often even more difficult to find the relevant information on the ferry operators' websites, having to resort to the search function in many cases. Once again, the links bore intriguing labels, such as *Good to know* (Tallink). The obscure positioning of the information may be explained by the fact that these websites serve primarily a commercial function. No matter how important safety is for its reputation, a company may not wish to remind customers and passengers of the albeit limited risks of travelling by sea. The information in the various reports is predictably to be found in the Social/People sections.

The four areas of safety, seaworthiness of vessels, security, health and emergencies appeared in both websites and reports, but none were necessarily present in each website or report. The focus of the information varies in the two genres, with the reports highlighting the safety and health of employees. In contrast, the websites are more concerned with the safety features and procedures on board, as shown by the keyword analysis (see Table 2: *health, employees, passengers, station*).

Reports vs Websites	Likelihood	Websites vs Reports	Likelihood
our	121.807	you	168.967
and	79.175	your	156.268
employees	75.407	be	109.276
we	53.675	or	101.333
health	48.144	cruise	77.634
group	47.991	travel	73.665
emissions	43.709	will	71.480
risks	40.897	passengers	70.767
mental	38.359	carnival	66.990
hse	38.359	cabin	42.504
management	37.048	contact	39.150
materiality	36.422	if	38.801
business	35.650	passenger	36.769
assessment	35.001	please	36.577
risk	31.446	trip	35.027
human	31.137	check	30.904
work	26.755	guests	30.785
operations	25.931	information	30.416
cybersecurity	25.493	station	29.874
practices	25.105	may	29.194

**Tab. 2:** Key words: reports vs websites; websites vs reports

Understandably, during and in the aftermath of the Covid-19 pandemic which played havoc on the travel industry, health became a dominant topic of safety. An analysis of the collocates of the word *safety* (3L and 3R) in both subcorpora confirmed the importance of health in the texts (see Table 3).



Reports	Websites
health	security
occupational	health
security	and
and	standards
management	comfort
awards	occupational
system	briefing
ism	regulations
quality	be
food	management
workplace	first
ride	convention
to	program
culture	act
standards	matters

**Tab. 3:** Collocates of safety in order of frequency (window span of 3L and 3R)

Interestingly, the topic is not limited to a strictly physical medical sense but also encompasses mental health and wellbeing, as example (1) shows. This would appear to be a necessary response to growing sensitivity and concern about these issues.

(1) SAFETY, HEALTH AND WELL-BEING

The safety, health and well-being of every life we touch – our guests, crew, and those in the communities we visit is vital. We focus on delivering safe operations fleetwide every day and everywhere around the world. We take this responsibility seriously and continuously evaluate ways to further improve and build a culture where safety, health, and well-being is part of everything we do. [...] Protecting their [employees] safety, health and well-being is a top priority. Our multifaceted approach focuses on their physical, mental and emotional well-being. (Carnival Report, 51)

Safety is, in fact, often subsumed into a more general discourse about the wellbeing of employees, as examples (2) and (3) illustrate:

(2) We strive for a safe, healthy, diverse, and inclusive work environment that allows people to thrive and contribute. (DFDS Report, 14)

It can even be connected to the question of environment, which certainly draws attention to key contemporary issues, but it seems to detract from the transparency of the communication on the specific topic of safety:

(3) Safety – Putting principles into practice – 2022

Preventive measures

We believe everyone needs to take responsibility for the environment and for safety. This is why we have a long track record of raising awareness of these issues among employees. (ForSea Report, 20)

The collocates analysis also revealed a frequent use of the words *management*, *standards*, *regulations*, *system*, *convention* and *program*, suggesting that safety is presented by companies as a well-oiled machine that runs effectively and efficaciously, as in example (4) with references to international and national standards:

- (4) The safety and security of passengers and personnel is our top priority. The staff's knowledge and efforts are crucial to safety and security work, and our procedures are all developed on a continuous basis through our safety and security management system. Safety and security efforts are based on operating vessels in compliance with the prevailing national and international regulations and standards, such as SOLAS, STCW, ISMC, MARPOL and ISPS, as well as careful internal monitoring and regulatory oversight. Continuous training in and monitoring of safety and security of the vessel crews are carried out in order to maintain and improve their skills in safety and security. Through its cooperation with various authorities, the company carries out systematic work to identify potential risk situations. (Viking line Report, 17)

This image is corroborated by the use of the word *culture*, as in example (1) and the concordance lines in Figure 1, implying that safety, as a way of being and acting, is firmly entrenched in the operations of the company and can be considered given and a guarantee.

initiative which is designed to continually enhance	culture and practice for all workers in Dublin
port-wide with the objective enhancing port safety	culture and practice for the long-term. On
Group has focused on creating a strong safety	culture and its performance for the year is
teams in safety and wellness programs, processes,	culture, and assist in the oversight and implementation
our team members an inclusive and supportive	culture and work environment with equal opportunities for
goal of zero accidents and injuries. Our safety	culture is based on high technical standards on
visit every ship to verify that our compliance	culture is strong and sustainable fleetwide. External public
and require us to focus on sustaining a	culture that keeps us safe in the workplace,
commitment to maintain a safe, diverse and inclusive	culture that supports and empowers our team members.
Our culture We offer our people a holistic	culture which incorporates safety, health, wellbeing,

**Fig. 1:** Concordance lines: culture

Although disclosure involves the communication of information, not all information may be necessarily welcomed by the addressees and can potentially be detrimental to customer relations. Generally, a less formal tone is given to the texts on the websites through the use of *you* and *your*, either as generic forms or addressing readers directly, in contrast to the reports' corporate *we* and *our* forms, as shown by the key word lists in Table 2. However, when sensitive or potentially alienating information is conveyed, companies resort to a 3rd person form to communicate in a more distant, impersonal and thus less imposing manner, as shown in example (5):

- (5) When security photos are taken, guests must remove hats and sunglasses, and any other article of clothing, including, but not limited to, veils or burkas, blocking any portion of their face. Provided that veils, burkas, turbans, head scarfs, and other religious or ethnic head coverings do not block the face, it is not necessary to remove them for the security photo. When any of these items needs to be removed for secondary screening, it will be done in a private location, if requested. Anyone unwilling to remove these items for the security photo or secondary security screening (when necessary), will be denied boarding and no exceptions will be made. (Carnival website)

In the corpus of websites this type of information is often imparted in FAQs, a feature typical of websites, which are seemingly based on feedback from interested parties and can thus appear as the result of the process of transparency, as (6) illustrates.

- (6) Q How many life-saving crafts do the ships carry?  
A The number of life-saving crafts varies on each class of ship. All of our ships have sufficient survival craft for everyone on board, plus additional capacity in reserve, per regulatory requirements. (Royal Caribbean website)

However, as the example shows, transparency is undermined here by the use of general information and vague language. While *sufficient, plus additional capacity* and *per regulatory requirements* give the impression that the company is meeting international standards, these vague words may also suggest that it is just doing the bare minimum.

## 4.2 Clarity

It is hypothesised that cognitive strategies, as described in Section 3, may be adopted to ensure information is presented in a clear, straightforward and unambiguous manner. Examples of each cognitive strategy can, in fact, be found in both the websites and reports, but with a greater frequency on the websites, as to be expected, because they will probably have a broader, generally less expert audience.

Description, however, is frequent in the reports because of the need to provide detailed information about the organisation of safety, as examples (7) and (8) show.

- (7) Onboard security  
We have a comprehensive system of security on all our ships which helps to protect our guests and crew. This includes our Access Control Protocol which requires proof of identity to access our vessels, plus security screening using x-ray, metal detectors, and explosives trace detection technology.  
Any items of luggage coming aboard our ships goes through strict checkpoints, and cabins are protected by auditable locks and individually equipped with safe boxes.

Public areas are monitored by an advanced CCTV system certified to a recognised technology qualification. (MSC Report, 27)

- (8) During regularly scheduled meetings, shipboard safety committees review and address specific workplace safety topics. These committees play a key role in reducing shipboard accidents through hazard assessments, accident reviews and inspections. These sessions also serve as a forum for promoting safety awareness and for raising, discussing and identifying solutions for shipboard safety issues. Safety representatives in brand shoreside departments communicate and share experiences as well as best practices throughout their respective fleets and across other fleets to ensure continuous improvement. (Carnival Report, 52)

Exemplification is used very frequently in both reports and websites, sometimes stating what may appear fairly obvious, as in (9), and may not be explicitly introduced, as in (10):

- (9) Safety first – ashore and onboard  
When it comes to safety first, always – that is true for everyone at Stena Line no matter if you work at sea, in one of our ports or in the office. We hold safety drills regularly across all work areas, such as fire drills at the office, mass evacuation of the vessels in cooperation with shore-side authorities and mandatory Health & Safety training for all of our port employees. (Stena Line website)
- (10) Safety checks  
On-board safety equipment is checked daily. Before every departure, the ship's officers go through a checklist to verify that the vessel is seaworthy. Hatches, doors and ramps as well as all navigation instruments are inspected. (Viking line Report, 17)

Exemplification should be a way of illustrating what is being communicated, concretising abstract or generic concepts, but extract (11) seems to be permeated with vagueness:

- (11) Safety-related regulations and requirements are rigorous – and ships often go substantially above and beyond what is required, for example carrying backup mechanical, navigational and safety provisions. (MSC website)

The words *often*, *substantially*, *above and beyond* recall the three categories of vagueness identified by Jin (2022), as time, quantity and degree. The plural *provisions*, which are generically exemplified as *mechanical*, *navigational and safety*, also fails to add clarity to the text.

Definitions are not very frequent as safety is not presented in either the reports or the websites as a highly technical topic. In example (12) illustrating a FAQ, the definition of the

term *muster drill* with two reformulations, *safety briefing* and *mandatory safety exercise* is followed by an explanation of its purpose, certainly to clarify, but primarily to stress the compulsory nature of the drill:

- (12) Q. What is a muster drill (safety briefing) on a Royal Caribbean cruise ship?  
 A. A muster drill is a **mandatory** safety exercise with the objective to familiarize all guests and crew with the location (muster station) where they are to assemble in the unlikely event of an emergency. During this drill, additional safety information (i.e., how to don a life jacket) is presented. The pre-departure assembly muster drill is a coast guard regulatory requirement and all guests must attend even if they have sailed previously. (Royal Caribbean website)

Indeed, cognitive strategies are not always adopted for the specific purpose of clarification. In (13), the exemplification provides an explanation, and implicitly a justification, for strict measures:

- (13) Through preventive measures we minimise the risk of offences and disturbances on board. We can raise the security level if required. Viking Line continuously carries out risk analyses and maintains close contacts and co-operation with different authorities, including the police, Customs, Border Guard, and social services.  
 With the help of a determined strategy and precise processes we aim to prevent disturbances and illegalities. We want, for example, to avoid the negative consequences resulting from excessive consumption of alcohol, and hence we act responsibly in selling and handing over alcohol. (Viking Line website)

Similarly, (14) aims to legitimise operations because CCTV surveillance may be seen as impinging on the privacy of passengers. Therefore examples of the reasons for it are given as an explanation and once again a justification:

- (14) The reasons behind our use of CCTV surveillance cameras vary depending on where each camera is located. These reasons can include:
- to monitor and investigate crime
  - to monitor and investigate accidents
  - to ensure safe shipping practices
  - to enable smooth and effective onboarding and disembarkation (ForSea website)

As discussed in Section 4.1, safety is presented as a well-organised system meeting the standards of national and international regulations. The following extract from the Tallink website is an example of what Coombs and Holladay (2013, 222) call “peripheral cues”, aimed at increasing the readers’ perception of transparency and the credibility of the company.

## (15) Safety certificates for Tallink:

- Document of Compliance\* by Estonian Maritime Administration
- Document of Compliance\* by Finnish Maritime Administration
- Document of Compliance\* by Swedish Maritime Administration
- Document of Compliance\* by Latvian Maritime Administration [...]

\* Document of Compliance is a document issued for the information of interested parties to indicate the compliance with the provisions of the International Convention of the Safety of Life at Sea 1974.

This is to certify the Safety Management System of the Company has been audited and that it complies with the requirements of the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) for the ships. The Document of Compliance is given for the period of five years, the auditing is done annually. (Tallink website)

The references to various Documents of Compliance may be sufficient for some readers who are positively impressed by these certifications, but the way they are presented does not add to clarity. Many of the visitors to the website are not expected to have the necessary knowledge of what a document of compliance is, and an explanation is provided. However, also in this case, the adoption of a cognitive strategy does not contribute in any way to clarification, as the explanation itself refers to external regulations without giving any details or further explanation of what they actually involve.

### 4.3 Accuracy

Perhaps the acid test of transparency is the disclosure of negative results. Certainly, the overriding promotional tone of corporate communication leaves little space for mentioning accidents, failures or incidents of various kinds. As to be expected, the few references to negative events usually appear in the CSR reports, where companies feel or are obliged to follow guidelines, unlike the case of websites where companies do not want to alarm passengers or create a negative image.

However, two cases of safety problems are reported in the websites corpus. In the company news section, Stena Line reports on a fire which broke out on board in a vehicle on a car deck and was successfully and easily extinguished. It describes all the procedures undertaken, including the evacuation of vulnerable passengers. All in all, it was a minor event, not caused by the company itself, dealt with professionally and expertly, and therefore worthy of a news report. Viking Line, for example, mentions generic *increased security threats* to the company, which it says will be tackled by using the latest technology, thus portraying the company as a leading, resourceful company, as shown in (16):

- (16) Due to increased security threats in public transport in Europe, there is a need to minimise this danger at the maritime terminals. Ensuring passenger traffic security is especially challenging in the core ports of Turku and Stockholm. [...]

The SecurePax project will tackle this challenge. Innovative digitalised security and ICT solutions will be implemented in the Viking Line passenger terminals in the ports of Turku and Stockholm. (Viking Line website)

In both cases the incidents seem to be used not so much for transparency as to boost the positive image of the companies.

In reports negative events are often presented in the form of graphs, tables and charts to support and substantiate information given in the text. However, statistical data are not always explained clearly or of easy interpretation unless the reader is an expert in the field. This practice is defined by Coombs and Holladay (2013, 217) as “data dumping” which aims to enhance the credibility of a company through its willingness or obligation to disclose this information. In extract (17), for instance, what appears to be fairly detailed information with numbers given about injuries at work betrays a significant degree of vagueness.

- (17) A total of 24 occupational accidents occurred in 2022. Four of the reported accidents led to a short period of sick leave. The most common injuries fall into three categories: fall injuries, crush injuries and burns.

Lost work days (LWD) due to injuries totalled 59 days (11). The accident frequency rate (AFR), which is an expression of the number of occupational accidents per hundred thousand hours worked, was 0.73 (0.22) accidents in 2022. The accident severity rate (ASR), which is an expression of the severity of accidents that have occurred, was 6.16 (1.22). This is a very low figure compared to the average for other industries and companies.

The number of SMS reports submitted (incidents, near-misses, suggestions for improvement, etc.) was 479 (370). No major deficiencies in overall safety ashore or at sea were reported. In addition to highlighting accidents, this reporting contributes to the early detection of hazards and to ForSea’s ability to take preventive measures, as well as the exchange of experience across departments, which has proven to be a good tool for minimising the number of workplace accidents. (ForSea Report, 21)

It is not said explicitly how long *a short period of sick leave* actually is. The comparison of data with the average for other industries and companies is *low*, but we are not given details about how severity of accidents is measured, which industries are involved and their figures. The reader has to accept the assessment of *low* as a fact. *No major deficiencies* sounds positive but once again we are not informed about what can be considered a major or minor deficiency.

In (18), various rhetorical devices are used to report negative circumstances. An increase in LTIF (Lost Time Injury Frequency) is explained and justified *by increased focus and follow-up*

on reporting, whilst the experience of the seafarer's death is seen as an opportunity to improve safety measures. Acknowledgement of the need to do more and of a commitment to improve are typical, well-established strategies in CSR reporting, but come across as vague and non-transparent. In both cases the highly positive evaluative words, *committed*, *thoroughly*, *strengthening*, are used to emphasise commitment, whilst *sadly* and *tragic* are used to express regret about the fatal accident. However, no details are given to indicate clearly and accurately what happened and consequent responsibility. These negative outcomes are rationalised to temper their impact, following the strategy identified by Fuoli and Paradis (2014, 57), "neutralise the negative, emphasise the positive".

- (18) Unfortunately, we have seen an increase of LTIF on both land and sea. A contributing factor is our increased focus and follow-up on reporting. But still our performance is not satisfying, and we are committed to reducing the number and severity of accidents going forward. With the new land-based Health & Safety organisation in place we will begin to look at evaluate [sic] if differentiated target setting for warehouse, terminals and office would be meaningful. In 2021 we sadly saw a tragic fatal accident on board on [sic] of our freight ferries in the Port of Sète. A Turkish seafarer died from his injuries. The accident was thoroughly investigated, and learnings led to an immediate strengthening of the local Health & Safety organisation by allocating resources to improve local procedures and align these across rest of the country. (DFDS Report, 16)

These examples illustrate how promotional elements often prevail over clear, detailed and transparent communication of information, and example (19) taken from a report seems to incorporate all the characteristics of promotional corporate discourse.

- (19) We go the extra mile to make sure our marine work environments are as safe as possible for our crew. One oddity about shipboard safety, however, is that the Occupational Health and Safety Administration (OSHA) has released few maritime-specific safety regulations regarding ship operations. Most OSHA regulations focus on shipbuilding and other drydock concerns, not what actually happens at sea. While we follow our own rigorous Occupational and Guest Safety standards, we also recognize that there's always more to be done.

In late 2022, we initiated a pilot on Royal Caribbean International's Oasis of the Seas, Harmony of the Seas and Freedom of the Seas to strengthen our approach to occupational and guest safety across our fleet. Through multiple layers of risk assessment, mitigation, monitoring and controls, the pilot focuses on the thousands of unique safety risks on a cruise ship — such as handling knives and chemicals, operating heavy machinery and installing AV equipment on our live entertainment stages. (Royal Caribbean Report, 49)



The highly evaluative, self-congratulatory language adopted, *go the extra mile, rigorous, strengthen our approach*, is typical of corporate, giving positive assessments of the work done by the company in an ongoing situation. The fact that there are few safety regulations specifically for ship operations at sea and recognising that there is always room for improvement legitimises any shortcomings that the company may be charged with. In addition, we can find vague expressions, *as safe as possible, few, and multiple layers of risk assessment, thousands of unique safety risks*.

## 5. Closing remarks

Although the pursuit of transparency has apparently gathered momentum in recent years, or at least attracted greater attention, it remains an elusive concept from a linguistic and rhetorical perspective. The study explored the resources companies use to communicate transparently in relation to the three dimensions of Disclosure, Clarity and Accuracy outlined by Schnackenberg and Tomlinson. However, the results of the analysis suggest that it is easier to identify the characteristics of a lack, rather than the presence of transparency.

The focus of this paper has been on the texts concerning safety in websites and corporate reports and, as such, dealing with a delicate but fundamental topic for cruise and ferry operators. CSR reports and websites necessarily respond to current issues, both positive and negative. After the Covid-19 pandemic, when safety was discussed in great detail in terms of the medical measures and technical questions such as air ventilation, the topic of safety has undergone a significant change. As regards the health aspect of safety, particular attention is given to psychological safety and employees' mental wellbeing. Security and emergency measures have a prominent place, especially on websites, whilst the question of the seaworthiness of vessels is subsumed into general references to compliance with national and international safety standards.

Both ferry and cruise operators adopted similar strategies to enhance transparency, although these strategies did not always appear to be intended specifically for that purpose. Contrary to what might have been expected, the cognitive strategies used in knowledge dissemination, namely description, explanation and exemplification to foster understanding, do not always contribute primarily to clarity, but indeed, often serve to justify company operations, for example in the use of surveillance cameras as shown in (14). Legitimation is a characteristic of corporate communication, which, by its very nature, is promotional and always aspires to enhance corporate image, especially in moments of difficulty. By giving more detailed information by exemplification or explanation, these strategies can nevertheless contribute to transparency and greater understanding.

Another strategy found in the corpus is the use of numerical data, seemingly to give reliable, substantial and precise information. However, details in the form of numbers and statistics do not guarantee transparency if presented in vague or undefined terms, which can obscure their real value, as seen with figures about accidents and lost working days in example (17). Indeed, what appears to be a key obstacle to transparency in both reports and websites is the use of vague language, which clearly pulls in the opposite direction to clarity and accuracy and therefore does not favour transparency. In example (20) the number of smoke alarms on board ships is given to provide supposedly precise information. It is a round number but preceded by *approximately* and in any case the average reader is not in a position to evaluate in absolute terms whether 3,500 alarms represent a large number or not, also as this depends on the size of *a typical Carnival ship*.

(20) Locally Sounding Smoke Alarms

A typical Carnival ship has approximately 3500 smoke sensors, which sound on the ships bridge. The bridge is manned 24 hours a day whether a ship is at sea or in port. The sensors are located in every guest and crew cabin as well as all public areas. (Carnival website)

Vagueness is ubiquitous in language (Lim and Wu 2023) and consequently can be difficult to detect unless the reader reflects closely on the text. The analysis revealed an extensive use of hyperonyms, such as *management*, *system*, and generic adjectives and adverbs, as well as indefinite expressions of quantity, time or degree in both websites and reports. However, while vagueness may undermine the value of some statements, it may be argued that it should not always be considered negatively. Detailed information can be highly technical in some subjects and not necessarily relevant for many stakeholders. Vagueness and lack of details may be a way of avoiding baffling information or information overload. For example, the average visitor to a website, a potential passenger, is most probably satisfied with the references to certifications awarded to the companies by national and international organisations and willing to accept them without further detail. In this way companies rely heavily on their reputation and the consequent trust placed by readers on them and the various national and international safety authorities.

As highlighted by various scholars, trust is a fundamental aspect of transparency, although it has to work in both directions, as being transparent makes a company more vulnerable (Rawlins 2008). Disclosed information may be used against a company or have negative repercussions as, for example, when sensitive, potentially unwelcome, alienating information is communicated. The analysis showed that the strategies used to convey this type of

information in websites, namely impersonal forms, FAQs and exemplification, do not undermine the transparency of the communication, which is clear and easily understandable.

The basic difficulty facing companies is the need to accommodate the interests and expectations of a variety of stakeholders. The perception of transparency will depend to a great extent on the expectations of the individual readers, which may vary significantly for the two genres analysed in the study. However, there do not seem to be differences in the degree of transparency in the language used and rhetorical strategies in the two genres.

## Acknowledgements

This study is part of a national research project financed by the Italian Ministry of University and Research: “Communicating transparency: New trends in English-language corporate and institutional disclosure practices in intercultural settings” (PRIN 2020TJTA55).

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