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When Corporate Communication Goes Public: Communication Policies in Public Communication

Abstract

This article deals with communication policies within the public sector. It takes its point of departure within the overall framework of corporate communication and hence exclusively sees communication policies from that perspective. Communication policies are seen as means of corporate communication. As means of corporate communication they feature what we have labelled 'mediational properties' within an organization. As such they – from a communicative point of view – constitute the interface between the strategic and the operational levels of communication management. As policies they should support decision making processes when it comes to ensuring that any instance of communication is in line with the mission, vision and values of an organisation. And they should offer a definite course of communicative action contingent on situational factors. The contextual background of the article is the re-structuring of the Danish regional political landscape, which is to have taken place by January 1st 2007. Communicating the mission, vision and values of the new municipalities is seen as an essential part of re-configuring and maintaining political legitimacy in the transition period and beyond. The empirical part of the article deals with an extensive corpus analysis of a broad selection of authentic communication policies stemming from Danish municipalities. The analytical framework applied gives rise to a number of new observations regarding the generic heterogeneity of communication policies. The analysis also delivers new input to the theoretical discussion of the status of communication policies within a corporate communication framework in general and within a current Danish municipality setting in particular.

1. Introduction

On January 1st 2007 the Danish landscape of regional political institutions will have changed substantially and radically. A nation-wide reform of county and municipality structure as well as their geography

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will see to it that 271 municipalities merger into 98 and that 14 counties will be distilled to 5 regions (Christensen 2006:5). ‘Materialistically’, each new entity will have to re-construct itself by – more often than not – re-designing existing structures and aligning them to the new political and geographical realities. But when it comes to the more intangible (but never the less: critically important) assets, such as legitimacy, each new entity will basically have to re-invent itself. And this is exactly where the communicative efforts in general and the communication policies in particular of the new municipalities may very well play a crucial role.

The reason for making communication policies the pivotal point of this article is twofold; both are linked to what we have labelled the ‘mediational properties’ of communication policies: First of all a communication policy is – at the same time – both a sign of change and an instrument for making changes. As such it constitutes the interface between ‘old communicative order’ and ‘new communicative order’. Secondly, within an organization a communication policy plays the part of an interface between strategic decisions and operational actions. As such it sees to it that mission, vision and values are reflected in the organization’s communicative efforts.

2. Corporate Communication and the Public Sector

In this article we do not intend to recapitulate the history of ideas of organizational communication theory (for a relatively recent account see for instance Miller 2003), neither do we intend to paint the broad picture of prevailing organizational management fashions (for a relatively recent account see for instance Veen 2002). Our point of departure for dealing with communication policies in a municipality setting is that of ‘corporate communication’. Corporate communication being, in many ways, the paradigmatical capstone of organizational communication in the sense that it a) embodies an integrated approach to communication, and b) understands integrated communication to be a matter of upper-level management. Speaking with van Riel we define corporate communication as:

”Corporate communication is an instrument of management by means of which all consciously used forms of internal and external communication harmonised as effectively as possible, so as to create a favour-

able basis for relationships with the groups upon which the company is dependent.” (van Riel 1995:26)

That this approach to organizational communication is not only adhered to within business and industry but also increasingly is finding its way into governmental and public institutions is reflected in the laconic argument put forward by Cornelissen when he states that:

“An effective streamlining of communications activities is just as important to organizations within the public sector as in commercial firms”. (Cornelissen 2004:141).

Within a Danish context the trend is also illustrated in the number of recent publications within the field (cf. for instance Pedersen 2003 and Pedersen et al. 2006 as well as the list of references in this article).

2.1. Public Communication and the Issue of Legitimacy

In this article we deal specifically with a certain kind of public sector organizations, namely municipalities. Municipalities are – as per definition – organizations wielding political power, a power which in turn has been vested in them by law. I.e. the power to regulate, as it were, certain aspects of the lives of citizens, organizations and institutions within its jurisdiction. Summing up, municipalities are political authorities; and in post-modern society political authorities – like any other ‘authorities’ – are being challenged in a variety of ways. One of the challenges is that of legitimacy:

Legitimacy involves the capacity of the system to engender and maintain the belief that the existing political institutions are the most appropriate ones for the society. (Lipset 1984:64 quoted from Klausen 2003:75)

If a certain political power is not *believed* to be legitimate it may very well face the very real prospect of being made obsolete. This in turn makes it quite clear that, for the new Danish municipalities of 2007, legitimacy becomes not merely one among many issues, with which they must deal, it is probably *the* issue (cf. also Frandsen et al. 2005:13).

In order to solidify that idea further, we may situate it within the setting of both communication and organizational theory. Refining the notion of ‘general systems theory’ Katz and Kahn (1978) depicted organisations as “[...] open social systems characterized by permeable bound-

aries that permit interaction with their environments” (Windahl et al. 2002:84). The boundaries, in essence, being defined by multilayered and multidirectional flows of communication.

In an open social systems approach communication is seen as in principle transactive; meaning that communication “[...] is simultaneously interactive” and that “[m]eaning is created based on mutual, concurrent sharing of ideas and feelings” (Beebe et al. 2004:14). From a communicative point of view the open social systems approach in turn finds its ‘apotheosis’ in the statement of modern day organizational communication when it is stated that “communication is organization” (Cheney et al. 2004:7-8).

For our purposes we wish to enrich the tautological relationship between the two entities, communication and organization, in two ways. When it comes to communication we can say that communication is inseparable from the construction and maintenance and – logically – therefore also from the de-construction of an organization. And when it comes to organizations, one of the paramount features of post-modern society is that any organization will perpetually be involved in adapting itself to said society. Here adaptation should be appreciated in its Neo-Darwinistic optic, i.e. *not* “survival of the fittest” but rather “adapt or die”, meaning – for instance – that one ultimate adaptation is that an organizations simply seizes to exist.

This, then, is the background against which the communication policies could play a critical role. Because when the new municipalities of 2007 emerge, one of the very first items on their communicative agenda must be that of engendering and – if successful – maintaining the belief that they (in terms of legitimacy) are a) the rightful heirs to their political predecessors and b) able and willing to take on that responsibility.

In that process the communication policy *as a policy* could help in forming the link from the abstract mission, vision and values of the new municipalities to the concrete reality of their communication efforts.

2.2. The ‘Mediational’ Properties of the Communication Policy

Before we discuss what a communication policy is, let us first turn to the concept of a policy in general. For a general definition of a pol-

icy we concur with Pace (1975:184 *quoted from Jørgensen/Windfeld 2003:94*) when he says that it is:

[...] a general statement that is designed to guide a person's thinking about decision making in an organization. A policy specifies a definite course of action to be followed under certain circumstances.

According to Pace the reason for developing a policy is that it should a) support decision making processes in an organization and b) that it does so by offering a definite course of action contingent upon situational factors. It goes without saying that any organization will host a wide variety of policies; one of whom being the communication policy.

It is the role of a communication policy to function as a 'mediator' between the overall strategy and the operational communicative efforts of an organization (cf. also Frandsen et al. 2005: 68-69). As a mediator between strategy and operations the communication policy is situated at the level of tactics.

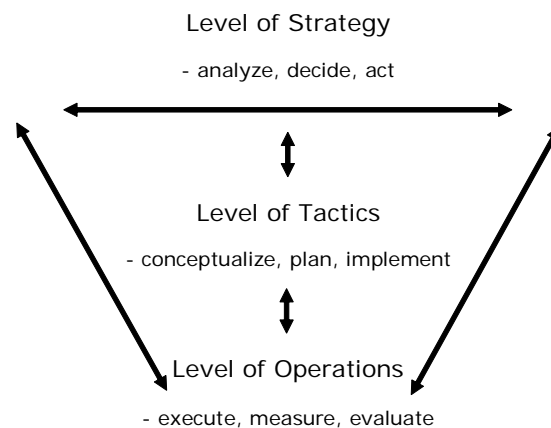


Figure 1 (adapted from Frandsen et al. 2005:70)

It is, however, not sufficient for us to determine that the policy acts as a mediator between organizational levels or functions (any middle manager, for instance, would also be an a priori 'mediator'). The policy as a policy has specific properties assigned to it, and it is these properties which set apart the policy from other mediational functions within an

organization. As a policy the communication policy should incorporate the following features:

1. it should reflect the organization's goals and be based on the organization's underlying values
2. it should be consistent with the organization's other policies
3. it should allow for a certain amount of self-governance; i.e. not be too specific but allow for interpretation
4. it should be written down
5. it should be communicated to the members of the organization

(Features adapted from Pace 1975:184 *based on Jørgensen/Windfeld 2003:94*)

These parameters lay down the foundation of a communication policy, but do not stipulate its content. We therefore turn to what constitutes the content of a communication policy.

In a communication policy the organization expresses its attitudes towards how its employees should communicate internally and externally. From the point of view of corporate communication¹ the communication policy is the policy with which an organization wishes to coordinate and integrate its internal and external communicative efforts in order for the organization to better achieve its goals (cf. Jørgensen/Windfeld 2003:14). The communication policy therefore must be in unison with the mission, vision and values of an organization. It does not itself, however, rank among these documents; the communication policy is a reflection of them at a tactical level. As such it is sanctioned by an authority at the strategic level of an organization and codified as an instrument of management.

Returning to Pace (above) we may now close in on an organization's communication policy in saying that it should:

¹ We explicitly take our point of departure in corporate communication and hence exclusively see communication policies from that perspective; for other views of communication policies cf. for instance Jørgensen/Windfeld (2003:13pp).

- a. support decision making processes when it comes to ensuring that any instance of communication – internally as well as externally – is in line with the mission, vision and values of an organisation
- b. offer a definite course of communicative action contingent on situational factors

Derived from the above introductory discussions and definitions, we have been able to establish two focal points of research interests for this article, both of which are explorative in nature.

2.3. Two Primary Research Interests

The two focal points being:

- To put to the test theoretically as well as practically (i.e. analytically) the framework for analyzing communication policies within a corporate communication perspective suggested by Jørgensen/Windfeld 2003.
- To discuss to what extent we are able to observe the ‘mediational’ properties of the communication policy by investigating a corpus of communication policies (i.e. do the communication policies “support decision making when it comes to ensuring that any instance of communication is in line with the mission, vision and values of an organisation” (?) and do the communication policies “offer a definite course of action contingent on situational factors”?).

To pursue the first of the two research interests we will commence by describing the test corpus of communication policies analyzed (section 3) and then proceed to give a critical account of the analytical framework suggested by Jørgensen/Windfeld 2003 (section 4), before eventually discussing the results of the analysis (section 5).

The second of the two research interests of the article will be pursued exemplarily by identifying and discussing textually bound traces (tokens) of ‘mediational’ properties in the communication policies investigated (section 6).

3. Description of the Test Corpus

The data for our analysis consists of a collection of authentic communication policies of Danish municipalities. The collection has been made

publicly available on the website *OIO - Offentlig Information Online* [*Public Information Online*] (www.oio.dk). OIO is according to www.oio.dk (English version):

a website and an electronic newsletter offering information, knowledge and access to tools in relation to IT in the public [sic!] sector as well as public sector communication. The principal target group is civil servants and other public sector employees who deals [sic!] with e-government and the implementation of IT in the public sector in Denmark. On www.oio.dk, a series of tools are contributing to secure the basis and coherence of the public sector's use of IT and to enhance effective public sector communication.

[...]

OIO is administered by the National IT and Telecom Agency under the Ministry of Science, Technology and Innovation in Copenhagen and based in the IT Governance Division under the authority of head of office Adam Lebech.

This source is particularly interesting because on this website a governmental authority offers tools “to enhance effective public sector communication”. One of the topics dealt with on the website is communication policy, and on the website access is given to a total of 23 communication policies from different Danish public institutions. Due to the fact that the policies have been made public on the official website of a Danish Ministry, the communication policies presented on the OIO website may be considered best practice and – as such – they are highly relevant for our purposes. Of the 23 communication policies 18 come from municipalities whereof the 16 make up the corpus for the analysis². Two municipalities, *Københavns Kommune* (Municipality of Copenhagen) and *Gladsaxe Kommune* (Municipality of Gladsaxe), are each represented with two documents on the OIO website, each describing individual communication policies. In the analyses, the four documents will therefore be considered four independent documents.

Ten of the 16 communication policies were published between 2003 and 2005. The rest was published between 1996 and 2002 (1996: 1 + 1 (revised 2002); 1999: 2; 2002: 1). One communication policy features no year of publication.

² For more detailed information regarding the corpus, see Appendix A.

4. Analytical Framework

In their book *Kommunikationspolitikker – fra hylde succes til styringsdokument [Communication Policies – from a mere showcase to a strategic document]* from 2003, Jørgensen/Windfeld deal with communication policies as a topic in its own right. The overall aim of the book is to provide a theoretical and practical understanding of communication policies in an organizational context (Jørgensen/Windfeld 2003: 9). As a consequence the organizational context and the process of developing a communication policy are considered just as important as the communication policy itself.

As indicated in the title of the book, Jørgensen/Windfeld 2003 can be seen as a resource for organizations wanting a communication policy which functions as a strategic document rather than a “mere showcase” as Jørgensen/Windfeld call it. For that reason, the main part of the book is dealing with more practical aspects of working with communication policies. It helps understand communication policies in a wider context and is, especially due to the many illustrative examples and cases, undoubtedly a rich resource for hints and inspiration. The theoretical parts and in particular the presentation of models are, by contrast, less transparent (see below). Nevertheless, Jørgensen/Windfeld 2003 must be considered an important contribution within the field, and it constitutes a firm basis for the description and the discussion of communication policies in public organizations.

For our analyses we have chosen to apply the approach suggested by Jørgensen/Windfeld; we have done so being very well aware of the fact that their analytical approach does not in any strict sense of the word constitute a method but rather a ‘model-like’ analytical framework. Even if their approach may be flawed (as we shall see) we have chosen to make use of it since it was specifically designed to work systematically with communication policies; and, hence, should give rise to observations and insights specific to the particular genre.

But, as stated earlier, before going on to applying the analytical framework, we wish to point out some of the problems which occurred during our application of the framework.

4.1. Critical Account of Jørgensen/Windfeld 2003

For our purposes, two dimensions of the analytical framework are of particular interest: The model which focuses on communication policies as a process, and the model-like listing of elements which focuses on the communication policy as a product. Concerning the latter, it should be pointed out, that Jørgensen/Windfeld do take into consideration all the elements of the list, but do not explicitly group them together as a model. The model of communication policy as a product as presented here is thus our extraction (primarily based on Jørgensen/Windfeld 2003, Chapter 8). Even if our focus of attention is on the communication policy as a product, both perspectives will be discussed in the below two sub-sections.

4.1.1. Communication Policy as a Process

As stated above, Jørgensen/Windfeld 2003 can be seen as a resource for organizations striving actively for a communication policy which functions as a strategic document. One of the main points of Jørgensen/Windfeld is that turning a communication policy from a 'mere show-case' to a strategic document requires a process which a) involves the entire organization and which b) covers all the phases from the earliest reflections to the implementation and the revision of the policy (Jørgensen/Windfeld 2003: 67). In order to support that process, Jørgensen/Windfeld suggest a programme of action consisting of six phases; these six phases in turn make up the model of communication policies as a process (2003: chapters 5-11):

1. determine the aim of the communication policy
2. make preparations for the development of the communication policy
3. develop the communication policy
4. check and test the communication policy
5. present the communication policy to the intended audiences
6. revise the communication policy

Even if the strict linearity of the phases at first glance may seem to be intuitively attractive, even logical and congenial with how one would traditionally envision the phases of such an implementation process,

this idealized linearity does – with all probability – not concur with organizational reality. Consequently, project management theory of a more recent persuasion freely accepts that neither project management nor the decision making phases which in essence make up the managing of projects is rational and linear. More often than not organizational processes (and hence: projects) are a complex conglomerate of conflicting ideas, different time- and deadlines and unaligned objectives (cf. for instance Stacy 2001 and Jensen et al. 2004).

Leaving the project management perspective and turning more specifically to the phases themselves it is not absolutely clear why Jørgensen/Windfeld operate with six phases and not for instance five or seven. Why for instance are the phases 2 and 3 different phases, what constitutes their ‘differentness’? The lack of explicitness in terms of tasks to be performed, of decisions to be made and who is to make them within each phase and what interfaces are to be established between the phases make the programme of actions a) problematic from a theoretical point of view and b) impractical from an operational point of view.

Singling out individual phases, we find yet other incongruences. It does not seem obvious, for instance, why other communication policies are not used for inspirational purposes in the phase 1-3. They do not play a role until phase 4 where Jørgensen/Windfeld (2003: 113ff) amongst other things recommend that a quality test against other communication policies be run.

The fact that the boundaries between the phases are blurred and that the content of the phases themselves – to say the least – is generic do make a direct application of the programme of actions very problematic indeed. The programme suggested by Jørgensen/Windfeld may, however, serve as a first tentative model of reference for an organization wishing to acquaint itself with the efforts involved in the process of developing and implementing a communication policy.

4.1.2. The Communication Policy as a Product

Situating ourselves within the analytical framework means that when focussing on the communication policy as a product (as we do in this article), phase “3 Develop the communication policy” is our natural starting point.

Jørgensen/Windfeld formulate (2003: 93-109) recommendations concerning the two-sided structure of essential elements which make up a communication policy as product. One side being the content and structure of the communication policy and the other being the textualization of the communication policy. The elements are shown in table 1³.

Elements of textualization	Content elements
Layout	Overall purpose
Title	Principles, values, visions, goals
Tone	Rules
Level of abstraction	Audiences
Length	Media
Application	Measuring communication efforts
Validity	Delegation of responsibility
	Strategy, plan of action, tools
	Co-thinking
	Priorities

Table 1: Essential elements of a communication policy

Naturally, the elements all seem relevant, but unfortunately, Jørgensen/Windfeld do not offer an account of how the elements were selected and what precisely is to be understood by these core elements. This might very well be due to the fact that the theoretical part of the book only takes up two sections (i.e. sections 2-4) whereas the practical part of the book takes up no less than nine sections and that the section dealing with the essential elements of a communication policy, namely section 8, is limited to but 16 pages. The practically oriented ambitions of the book result in a focus on general recommendations at the expense of in-depth theoretical discussions, which, as we saw above and shall see below, has unfortunate consequences.

That no best practice is offered makes the missing theoretical discussions even more problematic. Jørgensen/Windfeld do state in the preface (2003: 10) that it is not possible to come up with a universal solu-

³ For rhetorical purposes we introduce the two categories of elements in reverse order compared to Jørgensen/Windfeld 2003.

tion for composing ‘the good’ communication policy. We totally agree, since that would be the case for all but a very few texts anyway. But exactly for that reason, it is all the more important to be accurate, precise, and clear in the description of the core elements, in order to ensure a basis for understanding and acting according to the recommendations. As said above, this is not always the case. So, basically, even if no fully-fledged genre template with its move structures etc. can be described, then at the very least the relative importance of the elements, their (inter-)dependencies, their communicative value etc. could be discussed – especially so in a monograph focussing on said genre. Were the model to be used for more detailed analyses of communication policies, it will undoubtedly have to be more finely tuned.

Having said that, it is equally important to point out that our criticism does not concern fundamental issues (such as the two-sidedness as such or the elements per se), but foremost the lack of distinctness at basically all levels of the approach suggested. This holds especially true for a number of the content elements (cf. table 1). For instance what constitutes the discrete criteria for stating if, say, the “Overall purpose” or the “Rules” are to be found in the communication policy or not? Must a generic move explicitly be labelled “Overall purpose” in order for it to concur with the approach or would it suffice that an observer is able to interpret the content of a move and determine that this is where the “Overall purpose” is to be found or not?⁴ One way out of the cul de sac, as it were, of this approach could be to ground it in the very exhaustive theoretical apparatus of, say, genre linguistics (e.g. Swales 1990 and Bhatia 1993) or discourse analyses (e.g. Fairclough 1995).

Equally crucial is a much needed theoretical grounding and description of the elements or textualization (cf. table 1), such as for instance “Tone” or “Level of abstraction”. In the case of the “Tone” the ideas of face and face saving (cf. for instance Goffmann 1972) could be applied, when it comes to “Level of abstraction” two very different approaches come to mind: One being the journalistic approach (cf. for instance Grundwald et al. 1997) the other being the approach taken within “comprehension” (cf. for instance Kintsch/van Dijk 1978 and Christmann 1989).

⁴ Both strategies are in principle problematic in their own right; but that discussion is well outside of the scope of this article.

In our critical account of Jørgensen/Windfeld's approach we have made a number of concerns very clear in pointing to various issues with which the approach is faced. Having put the approach to the test theoretically it is now time we put it to the test from a more practical perspective.

5. Analysis of the Communication Policy as a Product - Results and Discussions

In our second part of putting the approach suggested by Jørgensen/Windfeld to the test we turn to the practical analysis of the corpus of communication policies (cf. section 3.1). In line with our research questions (cf. section 1) the analysis adheres strictly to the approach suggested by Jørgensen/Windfeld (2003). This implies that we cannot and will not execute our analysis based on a theoretically enhanced model (e.g. a model taking into account the criticism of the previous section). The general point being that only by applying the 'original' approach can we get a feel for its practical potentials and limitations.

In the following two sub-sections, which mirror the distinction between the "Elements of textualization" and "Content elements", the results of our analyses are presented.

5.1. Elements of Textualization

The first observation which strikes the eye when looking at the communication policies themselves and also by looking at the results of the analyses is that the documents seem to vary to an astonishingly degree. There are probably several reasons for the outspoken heterogeneity. But one of the main reasons may very well be that communication policies are relatively new in a governmental and municipal context and as a consequence, generic conventions for the textualization have not yet formed.

As we shall see in the below presentation of the findings, especially the textualization elements of "Title", "Length" and "Layout" serve as at good basis for illustrating the heterogeneity of the communication policies in general.

Seven of the 16 communication policies are titled "Communication Policy" (*Kommunikationspolitik*), two "Information Policy" (*Informa-*

tionspolitik), and one “Information and Communication Policy” (*Informations- og kommunikationspolitik*).

Title	Tokens
Kommunikationspolitik [Communication Policy]	7
Informationspolitik [Information Policy]	2
Informations- og kommunikationspolitik [Information and Communication Policy]	1
Kommunikations- og markedsføringspolitik [Communication and Marketing Policy]	1
Informationspolitik og –håndbog [Information Policy and Handbook]	1
Politik for borgerkontakt. Retningslinjer ved breve, e-post, telefonsamtaler og personlige henvendelser [Policy for the contact with the citizens. Guidelines for letters, e-mails, telephone conversations and personal inquiries]	1
Design- og kommunikationsmanual [Design and Communication Manual]	1
Kommunikationsplan [Communication Plan]	1
God kommunikation [Good Communication]	1

Table 2: Textualization element “Title”

In the remaining six documents the words “communication” or “information” are also part of the title, but here in combinations with words like “marketing policy”, “manual”, “handbook”, “guidelines”, and “plan” (For the exact titles of the remaining six documents, see table 2). These observations may, naturally, give rise to the question whether the documents are all in fact communication policies in a narrow sense of the word. However interesting it could be to pursue the possibilities for discrepancies at this level, it is not a discussion that will be led here primarily because the documents in the corpus analyzed are all available under the heading “Communication Policy” on the OIO website and thus function as a resource for working with communication policies in a public context (cf. section 3.1).

What the textualization element of “Length” is concerned, it can be summarised like this:

Pages	1-5	6-10	11-20	21-30	31-
Tokens	5	5	3	1	2

Table 3: Textualization element “Length”

Almost two thirds of the communication policies are between 1 and 10 pages long. One half of them are between 1 and 5 pages, the other half between 6 and 10. The shortest communication policy is 2 pages long and the longest 51. In average the analysed communication policies are app. 15 pages long. There is no unambiguous correlation between the length and the content and structure of the communication policies.

The heterogeneity can to a certain extend also be observed in the textualization element of “Layout”. If the communication policies are grouped together according to which prototypical genre they resemble the most ‘layout-wise’, three groups may be formed, as shown in table 4:

Genre resemblance	Tokens
Ordinary text file	10
Brochure / pamphlet	5
Magazine	1

Table 4: Textualization element “Layout”

The first group consists of the communication policies which basically are just plain text files (i.e. featuring no visuals etc.). 10 of the 16 communication policies belong to this group. In only two cases we find a logo on the front page – symbolically hinting the origins of the policy. In but one case do we find features such as tables, logos and templates within the text proper.

At the other end of the scale we find communication policies that do appeal visually to the reader. Five communication policies resemble the genre of a brochure / a pamphlet in respect to format, grapho-stilistics (e.g. creative use of font and pitch) as well as the use of pictures and

colors. The visual elements are used in a way that they – *ceteris paribus* – should have a positive effect on the reception⁵.

The last communication policy resemble most of all an old-fashioned in-house magazine or even a school magazine in respect to the use of black and white drawings of prototypical clerks and a notice board with bits and pieces of paper pinned to it etc. To that the producers of the policy have made extensive use of comic strip elements (e.g. of persons battling it out with giant section marks etc.). In this case the types and the number of visual elements may despite good intentions be considered patronizing – at least by some of the audiences.

The elements of “Tone” and “Level of abstraction” (as described in Jørgensen/Windfeld 2003) are categories which demand a more nuanced description if they were to be used as analytical tools. Accordingly the analysis only allows for very crude generalizations based on rather abstract impressions. These general impressions being that the policies investigated do show a considerable variety when it comes to the “Tone” and the “Level of abstraction”.

Singling out the element of “Tone”, the communication policies are to be found on a continuum ranging from informative / neutral via descriptive and instructive to prescriptive and dictating. Looking at “Level of abstraction” a continuum from highly abstract to highly concrete can be established. Neither continuum, however, is able to show any preferential tendencies.

Based on Jørgensen/Windfeld it is very difficult indeed to understand – let alone accept – the placement of the elements of “Application” and “Validity” under the textualization elements and not under the content elements.

Concerning “Application”, that element seems to be overlapping with the content elements of “Rules” and “Strategy, Plan of Action and Tool”. In our analysis we have categorized elements dealing specifically with giving concrete pieces of advice as to how a communicative event is to be handled in practice as expressions of “Application”. Out of the 16 policies four contain such practically oriented pieces of advice, two of which also contain references to style guides and manuals.

⁵ Cf. the “Uses and gratification” approach to communication / reception.

In eight of the remaining policies we also find references to style guides and manuals.

Concerning the element of “Validity”, that is an element only articulated in but four of the 16 policies. In two of the four policies the wish is stated for a continuous revision of the policy, in the other two the validity is specified as being two years.

All in all, even if the textualization elements as they are provided to us by Jørgensen/Windfeld may hint at similarities between the communication policies investigated, often they do not. The analysis at this level, then, does not reveal much about the nature of the genre in question – at least nothing which would allow us to pinpoint specificities for the genre. With these words we proceed to the analysis of the elements of content.

5.1. Content Elements

The analytical framework provided by Jørgensen/Windfeld 2003 does not in any accurate form state the criteria upon which the division between the content elements is to be made (cf. section 4.1.2). This leaves us no choice but to look for articulations of the individual content elements in question. Ideally the articulations should be close to verbatim renderings of the title “Overall Purpose”, leaving little or no room for errors of interpretation. The results of that search are illustrated in their condensed form in table 6. The table is then followed by a description of the tendencies, which our analysis gave rise to.

Legend	Tagged as
Overall purpose	A
Principles, values, visions, goals	B
Rules	C
Audiences	D
Media	E
Measuring communication efforts	F
Delegation of responsibility	G
Strategy, plan of action, tools	H
Co-thinking	I
Priorities	J

Table 5: Legend

	A	B	C	D	E	F	G	H	I	J
+	6	14	16	13	9	9	11	7	2	3
÷	10	2	0	3	7	7	5	9	14	13

Table 6: Content elements articulated or not

A: Overall Purpose

Close to one third of the communication policies can be said to feature the element of "Overall Purpose". Only half of these policies features the word "Purpose" (in the relevant connecting) verbatim. In nine out of the ten policies without an articulated "Overall Purpose" the reader is probably able to infer the purpose – especially from the paragraph in the policy which serves as the introduction. In the last policy without an articulated purpose no purpose is inferable.

B: Principles, Values, Visions, Goals

Given that the element of "Principles, values, visions and goals" are seen as crucial for establishing a policy (cf. Pace in section 2.1) it comes as no surprise that the element is present in nearly all policies investigated (i.e. 14 out of a total of 16). Based on the corpus and looking at communication policies as a product we may say that the approach suggested by Jørgensen/Windfeld has probably come up with a distinctive and maybe even a constitutive feature of the genre. It goes without saying that in order for that to be verified/falsified more extensive corpus analyses will have to be carried out. Singling out part of the element, namely that of "visions and goals", the analysis shows us that in all the before mentioned 14 policies there are visions and goals for communication.

The partial element of "principles" is only to be found in connection with "communication principles" and as such it is featured in no less than ten policies. The partial element of "values" is found eight times in connection with "organizational values" and but one in connection with "communicative values".

Among other things these findings quite clearly indicate the problematic nature of the content element in question. One of the more severe flaws being that it is nowhere near nuanced enough to be able to distinguish between "Principles, values, visions and goals" when used

as attributes to (general) organizational statements or as (specific) communicative statements.

C: Rules

Given that the definition of a policy states that it should offer a definite course of communicative action contingent on situational factors (cf. Pace in section 2.1) it is no surprise that the content element of “Rules” is to be found in all the policies investigated. This too, then, could be considered distinctive or even constitutive for the genre – here we explicitly reiterate the restrictions made to the same such categorizations in the above paragraph B. It must also be added that the formulation of the “Rules”, however, do differ significantly when it comes to numbers of rules, types etc.

D: Audiences

In 13 out of the 16 policies the content element of “Audiences” is articulated; 11 of which determine the audiences as citizens, the press and employees. The remaining two defines the audiences somewhat narrower in the sense that only employees/executives and citizens are targeted. The reason for the selectiveness of these two policies, we suggest, is to be found in the fact that here only those dimensions of the communication efforts of the municipality in question are described, which are specific to these very target groups.

In case of the three policies, which do not articulate “Audiences” a reader may infer that the audiences implied would be citizens, the press and employees.

Taking into due consideration the restrictions mentioned under B and reiterated under C this content element, too, could be distinctive or even constitutive to the genre as a whole.

E: Media

Nine out of the 16 policies feature some kind of listing of the media spectrum through which the municipality wants to communicate with its audiences and a comment on their respective communicative potential.

In four out of the remaining seven policies, in which no listing of the media spectrum of the municipality is mentioned, individual media are,

however, briefly mentioned when, say, an instance of communication is exemplified.

F: Measuring Communication Efforts

The content element of “Measuring communication efforts” is featured in nine out of 16 policies. Sometimes only a comment is made as to the wish of the municipality that communication be measured; in others a number of parameters with which to gauge communication are mentioned.

G: Delegation of Responsibility

When it comes to the content element of ”Delegation of responsibility” it is featured in 11 out of the 16 policies. Only in the rarest of cases, though, is the element treated with an exclusive paragraph of its own. Generally speaking the “Delegation of responsibilities” is dealt with in a rather abstract manor (one finds statements such as “Everybody holds responsibility for creating good communication”⁶) and more often than not the element is dealt with in conjunction with other elements.

H: Strategy, Plan of Action, Tools

Parts of the content element of ”Strategy, Plan of Action, Tools” (i.e. “strategy” and “plan of action”) appear in seven of the 16 communication policies. Generally speaking they are dealt with in a rather abstract fashion, even if a few “plans of action” do feature a campaign-like structure.

I: Co-thinking and J: Priorities

The content element of ”Co-thinking” is only demonstrated in two out of the 16 policies and the element of “Priorities” in but three. Hence, it is probably not feasible to bestow on these two elements any greater role when it comes to the communication policy as a product.

By way of summing up, we do acknowledge that the content elements of ”Principles, values, visions and goals” (B), “Rules” (C) and “Audiences” (D) may in due time be judged to be distinctive or even constitutive to the genre of communication policy; but – as stated several times

⁶ I.e. ”Alle har ansvaret for at skabe god kommunikation” (as quoted from Haderslev Kommune).

– based on the corpus investigated, we cannot with any certainty establish such conventionalizations.

In addition, other genres within an organizational setting may very well feature similar moves (e.g. the mission and vision statement to name but a few), which in turn calls for a fully-fledged content analysis in order to establish the properties which makes the communication policy different from other strategic documents. Add to that the need for discrete distinctions between policies of different persuasions (language policy, non-smoking policies etc.) in order to establish the unique features of the communication polices.

When it comes to the elements of textualization they give very few clues as to the nature of the communication policy as a genre (cf. section 5.1).

Having put Jørgensen/Windfeld 2003 to the test both theoretically (cf. section 4.1) and practically (above) we now turn to the second research interest of this article namely that of the ‘mediational properties’ of the communication policy as seen from a corporate communication perspective (cf. section 2.3).

6. On the ‘Mediational’ Properties of the Communication Policy

Synthesizing the above findings, which among other things gave us an empirically grounded understanding of real-life communication policies, and the theoretical insights arrived at earlier (cf. section 2), we are now able to turn our attention to the second research interest of this article. Namely the discussion of the ‘mediational’ properties of the communication policy. The discussion is divided into two questions:

1. Do the communication policies “support decision making when it comes to ensuring that any instance of communication is in line with the mission, vision and values of an organisation”?
2. Do the communication policies “offer a definite course of action contingent on situational factors”?

Re question 1)

Ideally communication polices do support the integrated perspective of corporate communication. Primarily this entails that the communication policy *as a policy* should not be seen as or thought of as being

a more or less autonomous entity. It should explicitly be an integrated part of organizational life and as such have an influence on the organization as a whole.

From that we arrive at a number of observations: A communication policy should ideally be seen as one of the strategic documents of the municipality. Being situated on the level of tactics (cf. section 2) the communication policy is derived from and hence subordinated to other strategic documents, such as the mission, vision and values of the municipality, which in turn are situated on the level of strategy. Being situated on the level of tactics, the communication policy should enter into co-operation with other policies on that level; such as HR policies, smoking policies etc. And last but not least the communication policy is also in itself a document from which other documents are derived; such as style guides, guide lines, FAQs etc. This means that in the hierarchy of strategic texts, the communication policy is superior to a number of other strategic texts, which are situated on the level of operations.

Whether or not this is the case when it comes to the communication policies analyzed is very difficult – if not impossible – to determine with any certainty. The primary reason being that the analytical approach applied focuses on the communication policy as a product.

Based on the analyses, however, a few hints as to the strategic imbeddedness of the communication policies can be found. In a couple of the communication policies analyzed we find that it is articulated as an overall purpose that the policy supports the values and goals of the municipality. In other communication policies that idea is not articulated but may be inferred on the basis of statements such as “the value basis and visions [of the municipality] must be reflected in and impose demands on the communication – both internally and externally”⁷. At the very least this should mean that the relationship between the strategic and the tactical level of the municipality cannot be an arbitrary one. There are also communication policies where the relationship is not articulated at all.

The point we would like to make, though, is *not* that it is a prerequisite for working with and talking about a communication policy (as part of a corporate communication approach) that the relationship be made

⁷ I.e. “[Kommunens] værdigrundlag og vision skal afspejles i og stiller krav til kommunikationen – både internt og eksternt” (as quoted from Glostrup Kommune).

explicit in the communication policy. What is a prerequisite, however, is for the process of developing and implementing to be an organization wide-effort. In order for that to happen it is imperative that upper-level management strata directly or indirectly adhere to working along the lines of corporate communication (cf. section 2) and that the process of developing and implementing the communication policy is taking place under the auspices of said management stratus. In line with that thought it is important that the communication policy be sanctioned by a relevant upper-level management stratus in order for the policy to obtain a basis of organizational authority.

In the corpus analyzed, six out of the 16 policies are sanctioned by the city council, which in turn constitutes the highest level of political authority within the context of the municipality. Four are sanctioned by the board of the directors of the municipality, which in turn constitute the highest level of administrative authority in the municipality. With regards to the status of the remaining six no indications are given as to whether any authorization has taken place.

Referring back to the critical account (cf. section 4.1.1) it is noteworthy that Jørgensen/Windfeld indeed do recommend that the prerequisite for developing and successfully implementing a communication policy is to make sure that the process “involves the entire organization” (op. cit.: 67). Unfortunately is not clearly stated what role the upper-management stratus plays and what its significance is to the process.

As a matter of fact the process envisioned by Jørgensen/Windfeld 2003 seems very much to be a contradiction in terms, since it is depicted as an autonomous process – and not an integrated one. A much needed integration of the process may be arrived at by for instance taking into consideration models of organizational decision making (cf. for an overview Choo 1998: 155-205).

Re Question 2)

That the policy should offer a definite course of action contingent upon situational factors is essential from a corporate communication point of view. The reason for that being that it is congenial to the credo of corporate communication; i.e. that having one single communicative platform is the best way to ensure organization-wide common ground. A common ground which then ‘translates’ into common processes, into making the organization appear (preferably: be) a homogeneous entity

when it comes to core values etc (cf. section 2). But being a ‘mediator’ between the level of strategy and that of operations, it does not suffice for the communication policy to merely reflect strategy, albeit at a tactical level. To be able to offer a definite course of action contingent on situational factors it must also take into consideration the heterogeneity or uniqueness of each communicative event.

Let us look at a mundane example: The communication policy should ensure that all citizens of a given municipality are treated equally, i.e. based on the same core values, but at the same time not necessarily dealt with the same way *communicatively*. How each citizen is dealt with communicatively is where the heterogeneity or differentiation comes into play. The communication policies analyzed do to a certain degree show signs of differentiating communicative efforts in the sense that most of the policies feature explicitly the claim that communicative action be dependant upon the intended audience and / or the media used (and to a certain – but: lesser – extent on the purpose).

In some of the communication policies it is expected that communicative efforts take into account audience qualifications (or segmentations) such as age, social background, ethnicity, handicaps etc. Even if communication theorists of today find such demographic qualifications inadequate per se (and consequently take into account both sociographic elements and elements from behavioural as well as cognitive sciences when attempting to determine an audience and its ability, capacity, and willingness to receive) it constitutes a start. However humble that start may be, it does – at least in principle – lay the foundation for a differentiation of the communicative efforts and hence the perception that every communicative event is unique and should be treated as such.

In one communication policy we find traces of that insight when it is said that “[the prerequisites for reception] are hugely different from person to person – and hence from assignment to assignment”⁸. Among the communication policies analyzed this is the only one in which that statement is made.

The differentiations in the communication policies typically are dealing with discerning between internal audiences and the press or the dif-

⁸ ”[Forudsætningerne] er vidt forskellige fra menneske til menneske – og dermed fra opgave til opgave” (as quoted from Herning Kommune).

ferent uses of genres in different media; e.g. letters to citizens, letters to the press, e-mails, press releases, announcements etc. Typically the statements regarding differentiation are limited to rather unspecific directives such as “We must design the pieces of information according to the receivers” or “Domain specific language is only used among professionals”⁹.

We do, however, also find examples of statements pulling in the opposite direction. In one communication policy the general guide line is to avoid foreign words and unnecessary domain specific phrases, to write clearly and concisely, to make good use of short sentences and to insert an ample amount of full stops. In yet another policy some of the general guide lines for composing letters to citizens are as follows: “Always begin your sentences so that the sentence verb comes before the subject [...] Variation may, however, occur”. “Always begin with the conclusion, if, say, you are replying to an application. Afterwards you should bring forward motivations, reservations etc.” “Keep in mind the inverted triangle [of composing news articles beginning with the most salient element and working your way down to the lesser salient elements] [...] when you write”¹⁰. Guide lines which are remarkably (if not surprisingly) in tune with Orwell’s rather apodictic recommendation regarding proper ‘modern’ newspaper English (1946).

The issue at hand is how to let the policy contain elements belonging to the domain of a policy (as a generator of decision making processes it should present general principles on the tactical level), and at the same time leave out the elements which belong to the domain of individual decisions (such as style sheets, how-to-do-it-manuals, FAQs etc.) at the operational level. This distinction is found in but one communication policy, where it says that “The communication policy applies to all areas within the domain of the decision-making competences of the city council. It is the common point of departure for all de-central communication policy and for the strategies, which can be sanctioned in the

⁹ “Vi må udforme oplysninger efter den eller dem, der skal modtage dem” and “Fagsprog anvendes kun blandt fagfolk” (as quoted from Dronninglund Kommune and København Kommune (*Kommunikationspolitik*)).

¹⁰ “Indled altid dine sætninger, så grundledet kommer før udsagnsleddet. [...] Der kan dog varieres.”, “Start altid med konklusionen, hvis du svarer på f.eks. en ansøgning. Bagefter skal du komme med begrundelser, forbehold mv.”, “Tænk på nyhedstrekanten [...], når du skriver” (as quoted from Struer Kommune).

administrative divisions, the institutions, companies and offices of the municipality”¹¹. An alternative solution to the dilemma is to insert references to specific guide lines as is the case in a number of communication policies (cf. section 5.1 “Application”). In a single policy this is even turned into a paragraph of its own.

It becomes obvious that two seemingly adverse forces are at play here, namely that of the ‘techne’ of journalistic practice on the one hand and the discipline of corporate communication on the other. The decision per se to develop and implement a communication policy is a strategic one, which situates the communication policy firmly within the realm of corporate communication. But the guide lines, style sheets, manuals and the like resulting from the policy are – basically – journalistic templates for composing texts. It would appear that the ‘mediational’ properties of the communication policy may be the very cause for the ‘schizophrenic’ nature of many of the policies investigated.

7. Conclusion

In this article the concept of the communication policy was investigated from the point of view of corporate communication. Within the theoretical framework of corporate communication we were able to establish the ‘mediational’ properties of the communication policy. I.e. that the communication policy should support decision making processes when it comes to ensuring that any instance of communication is in line with the mission, vision and values of an organisation and that the communication policy should offer a definite course of action contingent on situational factors. Within the context of the public sector, i.e. Danish municipalities, we argued that the communication policy may play a critical role in the transition period from ‘old’ communicative and political order (pre 2007) to the ‘new’ communicative and political order (post 2007).

Based on a critical account of the so far only monographic attempt at describing the communication policies of public and private sector or-

¹¹ ”Kommunikationspolitikken gælder for alle områder, der ligger under Borgerrepræsentationens beslutningskompetence. Den danner et fælles udgangspunkt for al decentral kommunikationspolitik og for de strategier, som kan fastlægges i kommunens forvaltninger, institutioner, virksomheder og kontorer” (as quoted from Københavns Kommune (*Kommunikationspolitik*)).

ganizations, we conducted an exhaustive analysis of a corpus of authentic communication policies. The idea behind being twofold:

1. to put to the test theoretically as well as practically (i.e. analytically) the framework for analyzing communication policies within a corporate communication perspective. The findings and the accompanying discussions made it clear that the analytical framework tested was flawed, both in terms of lack of theoretical grounding and in terms of practical usability. They also revealed that there seemed to be very little consensus as to what constitutes a communication policy, what its scope should be, at whom it should be directed and to what extent it is perceived as a tool of management or as a journalistic template for composing standardized text.
2. to synthesize the findings of that empirical analysis with the theoretical insights gained from within a corporate communication perspective. The ensuing discussions showed that a policy per se is a strategic document and hence could and should be imbedded in the corporate communication strategies of an organization. But it also indicated that there seems to be a discrepancy between the wish for a homogeneous appearance at one level and the demand for heterogeneity when it comes to communicative events. The fact that the communication policy is to be found at the heart of the discrepancy makes it a genre not easily overlooked. Both in terms of the need for further theoretical investigations into the nature of the 'mediational' properties of the communication policy as a strategic document; and in terms of establishing theoretically grounded but practically applicable methods with which to produce the communication policies needed in the not so far away future.

Appendix A: Communication Policies

Brønderslev Kommune: *Kommunikationspolitik Brønderslev Kommune, 2005-2006*. 2005.

Dronninglund Kommune: *Informations- og kommunikationspolitik for Dronninglund Kommune*. 1999.

Egvad Kommune: *Design- og kommunikationsmanual*. 2002 [1996].

Gladsaxe Kommune: *Kommunikationspolitik*. 2004.

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- Herlev Kommune: *Kommunikationspolitik for Herlev Rådhus*. 2005.
- Hørsholm Kommune: *Kommunikationspolitik*. 2003.
- Københavns Kommune: *Kommunikationspolitik*. 2004.
- Københavns Kommune: *God kommunikation*. 2004.
- Middelfart Kommune: *Informationspolitik*. 2003.
- Roskilde Kommune: *Roskilde Kommunes politik for borgerkontakt. Retningslinjer ved breve, e-post, telefonsamtaler og personlige henvendelser*. 2003.
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