Chapter 4

Frameworks for managing communication about Affirmative Action in South Africa

4.1 INTRODUCTION

This chapter is the last of three theoretical chapters and focuses on the management of the EEA through communication. The purpose of this chapter is to explore ways in which South African organisations can manage communication about affirmative action measures in order to effect transformation. Figure 4.1 illustrates the place of this chapter in relation to the other theoretical chapters.

Figure 4.1
Chapter 4 in relation to other theoretical chapters

The research question and the previous two chapters highlight the importance of this chapter. In an attempt to arrive at theoretical answers to the research question, existing frameworks are compared according to key criteria from literature on transformational change and transformational change communication. These criteria reflect the chaos perspective on transformational change and change communication.

None of the frameworks have previously been labelled as “models”, thus the principle of “frameworks” will be retained in this chapter. Furthermore the concept “framework” accurately reflects the philosophy...
from the chaos perspective. Thus efforts to integrate older and emergent ideas into a framework, are collectively labelled as “a conceptual framework”.

The frameworks that are compared are the Code of Good Practice for the EEA (1999) and suggestions regarding a communication strategy for Employment Equity by Thomas and Robertshaw (1999). Based on this comparison, Thomas and Robertshaw’s (1999) framework is preferred from both the strategic and tactical communication management perspectives, while the Code for Good Practice for the EEA (Department of Labour, 1999b) has much value in terms of ensuring legal compliance. The comparison of these two frameworks highlight their relevance in relation to the overarching research question.

Finally, since the goal of communication about the EEA is to facilitate organisational transformation, suggestions regarding a more comprehensive conceptual framework for strategically managed communication, forms the final component of this chapter. This conceptual framework emphasises the possibilities for integrating all organisational divisions in the communication process while adhering to the requirement of flexibility (adaptability).

## 4.2 FRAMEWORKS FOR MANAGING COMMUNICATION ABOUT AFFIRMATIVE ACTION

The overarching research question necessitates the consideration of existing frameworks for the management of communication about AA in the South African context. A literature review yielded six such frameworks, four of which were published prior to the promulgation of the EEA in 1998 and two shortly thereafter.

### 4.2.1 Four early frameworks: 1993 - 1995

Four frameworks were published by Linda Human (1993), Thea Wingrove (1993), SPA Consultants (cf. Pons & McGregor, 1994) and the IPM (1995) respectively. Two common elements of these frameworks are the rather mechanistic conceptualisation of the implementation process and the lack of details regarding the legislation that was eventually promulgated. As is the case for traditional (deterministic) models or frameworks, the management thinking of the era during which these four frameworks were published, is apparent throughout. The frameworks from both SPA Consultants and IPM are labelled as “toolkits” and are thus not discussed any further.
Wingrove (cf. 1993) describes the nature of and motivation for EE in the South African context holistically, with broad guidelines that ought to be considered in the planning of communication about the implementation process. This author describes some of the barriers to this process in similar fashion to De Beer and Radley (cf. 2000), but with an obvious lack of more recent developments in this arena.

The last of these early frameworks to be discussed was proposed by Human (1993:46-69). These guidelines regarding the communication responsibilities of different levels of employees are very comprehensive and based on the premise that the Human Resources function is central to the implementation of AA measures. The major point of criticism against this author’s suggestions is that they are perhaps too detailed and rigid. However, it is interesting to note that some aspects from these suggestions were revised and incorporated into the framework that is proposed by Thomas and Robertshaw (1999). Incidentally, the same author also views the management of diversity as the preferred approach for the implementation of AA measures.

4.2.2 Two later frameworks: 1999

The two frameworks that were published shortly after the promulgation of the EEA are the Code of Good Practice for the EEA (1999) and that of Thomas and Robertshaw (1999). Both frameworks have the added advantage of incorporating lessons that were learnt by a number of organisations prior to government’s top-down approach to EE.

Based on the research question and objectives, as well as the need for managing the organisational transformation of South African organisations strategically, the last two frameworks should be further explored. The description of these two frameworks also highlights a central argument that was articulated in the previous chapter, namely whether organisations will focus on legal compliance rather than lasting transformation. If organisations opt for communication only to comply with the minimum requirements regarding the “duty to consult and inform”, lasting organisational transformation (both at individual and corporate culture levels) is arguably unlikely.

The two frameworks that are discussed in detail represent both scenarios and are intended to serve as benchmarks. These frameworks also provide theoretical answers to the sub-questions and research objectives formulated in Chapter 1. Since Thomas and Robertshaw’s (1999) framework is so
comprehensive, it is also used as a measurement instrument for empirical analysis within each case study. The communication strategy of each organisation is compared to this framework by means of qualitative content analysis.

Finally, these two frameworks are presented as precursors to an attempt to provide a conceptual framework for the management of communication about EE matters. Elements from both of frameworks are also reflected in the suggested conceptual framework for managing communication in this transformational context, in an integrated manner.

4.2.2.1 Code of Good Practice for the EEA (1999)

The first framework to be considered is embedded in the Code of Good Practice for the EEA (Department of Labour, 1999b) that was published at the end of 1999 by the Department of Labour. The Commission for EE (that were appointed by the Minister of Labour) wrote this code. This document comprises nine components which include both guidelines for the overall planning of the process, as well as communication, awareness and consultation – these aspects are also stipulated in legal terms within the EEA (55/1998). For the purpose of this study, only the broad planning and communication dimensions, presented as Component 1 and Component 2, need further exploration.

- **Component 1: Planning**

The planning phase should commence with the assignment of one or more senior managers who should have the responsibility for the development, implementation and monitoring of the plan. They should be permanent employees that report directly to the Chief Executive Officer (Department of Labour, 1999b). According to this code the assignment of one or more senior managers implies that:

- The employer should also provide the assigned managers with the necessary authority and means, such as an appropriate budget, to perform their allocated functions;
- The employer is not relieved of any duty imposed by this Act or any other law; and
- The employer should take reasonable steps to ensure that these managers perform their allocated functions. This could be done through the incorporation of key EE outcomes in performance contracts of the responsible managers as well as line managers throughout the organisation.
The second component further describes the elements of communication, awareness and consultation.

- **Component 2: Communication, awareness and consultation**

According to this code employees should be made aware and informed of:

- The need for the involvement of all stakeholders in order to promote positive outcomes;
- The content and application of the Act as preparation for their participation and consultation;
- EE and anti-discrimination issues
- The proposed process to be followed by the employer; and
- The advantages to employees of participation in the process.

Employers must also consult with internal stakeholders with regard to conducting an EE analysis, the preparation and implementation of the EE plan, as well as the submission of EE Reports to the Department of Labour. To ensure the successful implementation of a plan, “... employers should make every effort to include employee representatives in all aspects of the plan, especially the planning and development phases” (Department of Labour, 1999b).

Managers should also be informed of their obligations in terms of the Act, and training should be provided to them where particular skills do not exist. Examples of required training could include diversity management, coaching and mentoring programmes (Department of Labour, 1999b). These aspects reflect both the premise of the diversity management approach and the responsibility spheres of transformational leaders (as described in Chapter 2).

The communication of an EE strategy should focus on positive outcomes, “... such as the better utilisation of all of the employer’s human resources and the creation of a diverse and more productive workforce” (Department of Labour, 1999b).

According to the same guideline document, communication should also include employees from non-designated groups and focus on the contribution these groups may make. This aspect emphasises the need for consultation (negotiation) vs. persuasion. It further highlights the complex needs of different internal stakeholders. This code also stipulates that consultation with employees “... should commence as early as possible in the process”. In order to achieve this objective, a consultative forum should be established or an existing forum utilised. The forum should include employee representatives.
reflecting the interests of employees from both designated and non-designated groups and across all occupational categories and levels of the workforce (Department of Labour, 1999b).

This code further suggests that representative trade unions or representatives nominated by such trade unions, must be included in the consultation process. The designated employer should be represented by one or more members of senior management. The unique aspect of the code is its reference to and clarification of the process of consultation. It also refers to the need for regular consultation and specific types of mechanisms. According to this Code of Good Practice for the EEA (1999) consultation would include:

- The request, receipt and consideration of relevant information;
- The opportunity to meet and report back to employees and management;
- Reasonable opportunity for employee representatives to meet with the employer; and
- Adequate time allowed for each of these steps.

To ensure an informed and constructive consultation process, structured and regular meetings of the consultative forum or forums should be held. Where a representative body or trade union refuses to take part in the consultation process, the employer should record the circumstances, in writing, including those steps that the employer has taken to communicate and initiate the consultation process. A copy of this document should be provided to the representative body or trade union concerned (Department of Labour, 1999b).

Finally, the disclosure of relevant information by designated employers is vital for the successful implementation of the plan. The suggested contents correlate well with the content frameworks previously discussed. According to the Department of Labour (1999b) the information could include:

- Information relating to the relevant economic sector or industry;
- The particular business environment and circumstances of the employer;
- Relevant local, regional, and national demographic information relating to the economically active population;
- The anticipated growth or reduction of the employer’s workforce;
- The turnover of employees in the employer’s workforce;
- The degree of representation of designated employees in each occupational category and level in the employer’s workforce;
The internal and external availability for appointment or promotion of suitably qualified people from the designated groups; and

Employment policies and practices of the employer.

The description of the consultation process and possible content concludes with an observation that highlights the overall approach to this transformational process: “All parties should, in all good faith, keep an open mind throughout the process and seriously consider proposals put forward” (Department of Labour 1999).

These two components from the code highlight the need for two-way (asymmetrical and/or symmetrical) communication, as defined by Grunig (cf. 1992). The importance of internal stakeholders and the representation of all groups are also central to these two components. Finally, these components illustrate the need for understanding EE planning and communication as an integrated process, while the suggestions about key messages seems to have much practical value for any designated employer.

4.2.2.2 Thomas and Robertshaw’s (1999) Employment Equity strategy

Thomas and Robertshaw (1999:9-12;29-35) suggests that the EE process be managed as a business strategy that is labelled as a “model for integrated thinking”. Secondly, they provide a framework for the management of a communication strategy for the EE process. These two components respectively form the basis for the strategic alignment of EE with the overarching corporate strategy, as well as the alignment and implementation of EE strategies by means of communication. The relevance of Thomas and Robertshaw's (1999) in relation to the research question is obvious.

The comprehensive scope of their proposed communication strategy served as motivation for including it as an empirical investigation tool per case study. Core ideas from the broader strategy also guided the formulation of questions that were included in the final interview schedule. The aforementioned authors (both experts in the field of EE) agree with De Beer (cf. 1998), De Beer and Radley (cf. 2000) and the King Report II (cf. 2002) about the ideals of tapping into the diverse potential of all types of employees in the EE process. They emphasise that diversity may contribute to organisational creativity, problem-solving capability, flexibility and adaptability.
4.2.2.2.1 A model for integrated thinking

This model comprises six phases, as illustrated in figure 4.2 (on the next page). Each of these phases will be discussed in relation to theory from the previous chapters.

This model firstly emphasises the fact that different elements of the implementation process are dependent on an understanding of the legislative requirements from the EEA. The transformational process that flows from this paradigm is continuous, an interpretation that is congruent with the conceptualisation of transformational change, as described in Chapter 2.

- **Phase 1: Leadership**

Thomas and Robertshaw's (1999:126) perspective on transformational leadership seems to reflect the chaos perspective on leadership. They emphasise interactive leadership and leaders’ responsibility to create the environment in which a vision for the EEA could be co-created. Similarly to Anderson and Ackerman Anderson (cf. 2001), Keene (cf. 2000) and Moran and Brightman (cf. 2000), the creation and promotion of the values that will sustain the new vision, demands individual responsibility and accountability (Thomas & Robertshaw, 1999:127). The same authors are convinced that line managers are central to the creation and promotion of the aforementioned values. Therefore their performance regarding this policy should be measured.

Thomas and Robertshaw (1999:127) further seem to agree with the chaos perspective on the complexity of aligning personal and organisational values. They claim that the number of value-creation workshops don’t necessarily lead to personal transformation since these values cannot be merely summarised onto posters or wallet cards without internalisation. Values need to transpire in the daily interaction between employees. This view is congruent with De Beer's (2003) view on this matter.

This first phase seems to be based on the traditional notions of the symbolic value of corporate leadership. In essence, the commitment of senior/top management is deemed a requirement to sustain the credibility and momentum of this transformational process (Thomas & Robertshaw, 1999:137).
Figure 4.2
A model for integrated thinking about Employment Equity

Phase 1
Leadership by Top/Senior Management
- Will to transform
- Inclusion of stakeholders
- Diversity vision
- Business as well as moral and legal imperatives
- Establishment of process to develop shared values
- Development of communication strategies
- Monitoring of progress

Phase 2
Review of HR policies and practices and company structures (formal and informal)

Phase 3
Organisational diagnosis
- "Unspoken rules"
- Organisational culture
- Barriers to and drivers of EE
- Establishing a benchmark

Phase 4
Employee involvement
- Understanding of business imperatives
- Participation in developing shared values
- Involvement in EE process (including monitoring)
- Provision of feedback

Phase 5
Broad-based intervention
- Ongoing review of values
- Specific programmes to address issues
- Training in leading and managing diversity

Phase 6
Ongoing monitoring and evaluation

Source: Thomas and Robertshaw (1999:137)
Corporate leaders are responsible for setting an example for allaying fears and promotion of the emerging corporate values (Thomas & Robertshaw, 1999:125). Thomas had also conducted research for the Department of Labour during 1998 and found that employees prefer to look to leadership figures for guidance in these matters (cf. Thomas & Robertshaw, 1999). Finally, these authors view leadership as central to the creation, development and promotion of “… strong communication structures and systems”. They contend that South African research has also proven that face-to-face communication between employees and senior leadership is still regarded as essential for the correct transfer of information. This is in spite of the existence of EE Committees (Thomas & Robertshaw, 1999:127-128).

- **Phase 2: Revision of human resource policies and practices**

  The transformation process related to the EEA cannot succeed without revision and alignment of all human resource policies and practices (Thomas & Robertshaw, 1999:129). The alignment process should also be based on consultation between the EE Committee, management and other employee representatives. All human resource mechanisms should be aimed to facilitating the free flow of information about the EEA, specific organisational initiatives and inclusion of all employee categories. In the past women levelled much criticism at the male boardroom members (Thomas & Robertshaw, 1999:130).

  They also warn against ignorance of the less visible or informal communication tools in all organisational endeavours, but specifically also in this context. Non-traditional communication tools or networks must be explored since these may suit the needs of employees and the “cause of AA” far better than older mechanisms.

- **Phase 3: Organisational diagnosis**

  Any physical or collective psychological barriers to full integration of all employees constitute “barriers” in the workplace. And since the EEA emphasises the removal of such phenomena, Thomas and Robertshaw (1999:131) suggest that a complete organisational diagnosis be completed. Contrary to
the first possible interpretation of this phase, the authors suggest that the positive elements of the organisation also need to be highlighted by means of such an analysis.

The aforementioned authors warn, in similar fashion as De Beer (2003), that the new values should not constitute assimilation of individuals or groups in areas that are not directly related to their jobs. Values should rather reflect fairness and performance standards that echo the EEA. The vision of diversity management should be the key driving force in the creation of an organisational climate that will contribute to the implementation of the EEA (Thomas & Robertshaw 1999:131).

- **Phase 4: Employment involvement**

  Thomas and Robertshaw (1999:132) emphasise the principle of employment involvement throughout. But this dimension is highlighted as Phase 4 in figure 4.3. Open and free participation in this transformational effort is valued. Therefore Thomas and Robertshaw (1999:132) maintain that a democratic process for the election of the EE committee is not negotiable.

  All managers should also be trained to deal with the EE and diversity issues effectively and sensitively. In contrast to the autocratic cascading down of EE targets, managers should ideally facilitate the target-setting process within their spheres of responsibility. Both the values and targets could then be communicated to top management for consolidation (Thomas & Robertshaw, 1999:132).

- **Phase 5: Broad-based intervention**

  “EE needs to be seen as a strategic issue, effected in an holistic manner with management commitment and with accountability at all levels” (Thomas & Robertshaw, 1999:133). With this statement the authors warn against “flavour-of-the-month” attitudes and techniques for the implementation of the EEA. They suggest that Phase 5 should focus on the development of broad and more specific programmes, specifically to address problem areas.
Phase 6: Monitoring and evaluation

Phase 6 could arguably not really qualify as a separate phase since it focuses on ongoing monitoring and evaluation of all implementation activities and is embedded in all previous phases. However, figure 4.3 illustrates the importance and place of this phase within the realm of continuous change. The EEA (55/1998) emphasises the fact that organisations need to report their progress in annual EE reports and EE plans to be submitted to the Department of Labour. (Refusal to do so, may result in punitive measures, in the form or fines, being instituted against organisations.)

From this perspective, monitoring and evaluation may be viewed as the mere phase for ensuring that designated employers comply with the EEA. However, Thomas and Robertshaw (cf. 1999) view this as being equally important as the previous and concurrent transformational phases. Thomas and Robertshaw (1999:134-135) also draw upon research completed in the USA to broaden their classification of such continuous monitoring. (They list 16 examples of feedback that are reduced to six broad categories for the purpose of this study.)

The number of designated employees in strategic positions and a reduction of staff turnover in the designated ranks are the first two categories. (Incidentally, the phenomenon of aspiring individuals from the designated groups moving from one organisation to another at short intervals in pursuit of better remuneration, especially when the pool of expertise is rather small, is popularly referred to as “affirmative auction”.) These authors firmly believe that the nurturing and development of talent could curb this phenomenon. The third and fourth categories refer to the number of individuals from designated groups who are being mentored for more advanced positions and parity in salary between black and female employees in relation to their white counterparts.

The fifth category refers to the quality of communication about the EEA. The final category pertains to the progress of the business in terms of “... penetration of new and previously untapped markets” (Thomas & Robertshaw, 1999:134-135). These categories are relatively comprehensive and provide alternatives to the narrow interpretation or use of the mechanisms prescribed by the EEA. Their views are also congruent with De Beer’s (1998:72-73) critique of the top-down approach to AA.
4.2.2.2 A framework for a communication strategy

The framework for an EE communication strategy that Thomas and Robertshaw (1999) propose, also encompasses several phases. As was indicated previously, the use of this framework is not conceived as realistic without the foundation of the framework for integrated thinking. The level of detail of this framework is rather comprehensive, thus making it a possible benchmark for South African organisations that implement EE strategies. The different components of the communication strategy framework are reflected in Table 4.1 (which stretches over two pages).

Table 4.1
Thomas and Robertshaw’s communication strategy for Employment Equity

<table>
<thead>
<tr>
<th>Phase 1: Positioning the organization</th>
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</thead>
<tbody>
<tr>
<td>Communication is pivotal</td>
</tr>
<tr>
<td>Each organisation’s stakeholder map will be unique</td>
</tr>
</tbody>
</table>

Content of the communication strategy

| Rationale for strategies that go beyond legislative requirements, including the moral, legal and business imperatives |
| Commitment by top management to Employment Equity |
| Logistics of the process, including the development of strategies |
| Statement of acknowledgement that employees may have concerns about Employment Equity |
| Statement of acknowledgement that Affirmative Action will create greater diversity and that everyone will have the opportunity to striving toward corporate goals |
| Details of how barriers to Employment Equity will be identified and how the culture of the workplace will be addressed to achieve the aforementioned |
| Reassurance of the commitment of management to openness and participation in the formulation and implementation of the Employment Equity Policy and Plan |
| Reassurance of regular feedback and communication relating to the progress of the Employment Equity initiatives. |

<table>
<thead>
<tr>
<th>Phase 2: Management consensus</th>
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<tbody>
<tr>
<td>CEO and top management’s commitment to the process must be visible</td>
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<tr>
<td>Criteria for communication: The message must come from the top, be consistent, accurate, regular and never just a once-off message that may be perceived as “flavour of the month”.</td>
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Phase 3: Communication with employee representatives

- **Overall goal:**
  To obtain the full support of all members of this group before proceeding any further.

- **Employee structures:**
  Workplace forums, trade unions representatives and other elected bodies of Employees

- **Approach to communication:**
  Never present a mere blueprint for the way forward
  Seek input regarding strategies to achieve Employment Equity within the parameters of the legislative framework.

- **Suggested mechanisms:**
  Discussion groups

- **Suggested discussion topics:**
  Trade union philosophy and vision of Employment Equity
  Company philosophy and vision of Employment Equity
  Developing a shared vision of Employment Equity
  Legislative requirements
  Employment Equity Committee, including its roles and responsibilities

Phase 4: Ongoing communication with employees on programme level

- **Tactics:**
  One or more senior managers must be present at face to face discussions

- **Contents:**
  Key points of legislative requirements
  Distinctions between the terms “Employment Equity”, “Affirmative Action” as well as “Leading” or “Managing” diversity
  The rationale for Employment Equity, including:
  - National and regional demographics
  - Business imperatives
  - The concept of nation building
  - Legislative requirements

- **Consideration of the target audience:**
  Fully representative of the workforce in terms of race, gender and disability
  Interpreters should be used if language barriers exist
  Discussions should be pitched at an appropriate level of complexity in relation to each discussion group

- **Communication climate:**
  Trust: Employees should feel free to raise their fears and questions freely

- **Communication channels:**
  Regular reports from the management board; monthly management reports; regular briefings from the CEO in person; monthly top and line management feedback in person; quarterly feedback from employee representatives; pamphlets on the EEA policy; regular items in internal newsletters; highlighting statistics on and progress made towards EE in all management reports; publication of milestones achieved in special reports; intranet updates; open discussion forums; notice-board updates; hot lines; videos; road shows by senior management to state and demonstrate commitment to EE.

Source: Thomas and Robertshaw (1999:29-35)
From a corporate communication perspective it is significant that Thomas and Robertshaw (1999:132) view communication as central to this transformational process and also emphasise its strategic potential.

- **Phase 1: Positioning the organisation**

The first phase should ensure that the organisation is positioned strategically through communication, including a stakeholder map. This view is congruent with Steyn and Puth's (cf. 2000) conceptualisation of the place of stakeholder maps in relation to corporate strategies and specifically a corporate communication strategy. Communication is also viewed as the means through which organisations articulate its strategic intent and involve different stakeholders in relation to such a transformational vision.

Interestingly, Thomas and Robertshaw (1999) also identify eight points of content that need to be managed at the strategic level. The need for the organisation to move beyond strategies that will only ensure legal compliance is the first such point. This point reflects the arguments from previous chapters about organisations having to embrace transformation vs. legal compliance. The emphasis on the moral, legal and business imperatives of AA would provide direction to the transformational effort.

Three other noteworthy points are the fact that the organisation should accommodate the deeply-held sentiments about AA measures, while expressing the organisation's commitment to open communication and dialogue. These principles would arguably contribute to a climate in which employees would feel safe to contribute to the process or to question particular actions or outcomes. When compared to literature on the role of communication in change and transformation, the inclusion of these three points should be complimented.

- **Phase 2: Management consensus**

The second phase focuses on the role of management, both consensus about and commitment to this transformational effort. The guidelines within the integrated framework apply *idem ditto* to this phase.
Phase 3: Communication with employee representatives

The third phase of the strategy focuses on communication with employees, which is based on the goal of obtaining support for the transformational communication effort, before proceeding (Thomas & Robertshaw, 1999:137).

Employee communication structures, the approach to communication and suggested discussion topics represent the ideals of two-way symmetrical communication. The development of a vision and clarification about the role of the EE Committee are also embedded in this phase (Thomas & Robertshaw, 1999:137).

Literature on transformational change management confirms that the corporate vision is still central to translating the picture of the organisation's future. Visioning is applied slightly differently in this phase, but it emphasises the dialogical nature of transformational change communication: key stakeholders need to share their own sentiments and appreciate the sentiments of others.

The obvious ideal would be to arrive at some (even loose) form of consensus about this matter. Whether such a vision would ultimately really move the organisation forward, would have to be tested empirically. Thus the theoretical merit of Thomas and Robertshaw's (1999:125-139) should be appreciated. Communication with employee representatives should also include discussions about the roles and responsibilities of the EE Committee. Clarity about the place of this important organisational mechanism seems to be a key requirement from the perspective of the Code of Good Practice for the EEA (Department of Labour, 1999b).

Phase 4: Ongoing communication with employees at programme level

The final phase suggests that communication with employees ought to be continuous. The conceptualisation of communication plans flowing from a communication strategy again reflects the thinking of Steyn and Puth (cf. 2000). The contents described in this phase should thus not only be disseminated once or only to a select few. The contents include some elements of the EEA Plan
requirements (Thomas & Robertshaw, 1999:116-123). Thomas and Robertshaw (1999:137) further insist that representatives for this mechanism be elected in a democratic manner, once again contributing to a climate of trust. Such a climate would arguably contribute to optimism and the credibility of AA, as opposed to a climate of almost unbearable uncertainty or intolerance.

One significant component of this phase is the requirement of clarification of the differences between the concepts that often get confused, as was explained Chapters 1 and 3. Finally, this phase emphasises that the creation and maintenance of an open communication climate (Thomas & Robertshaw, 1999:116-123).

A critical content component of phase four of Thomas and Robertshaw's (1999:132) communication plan is the clarification of the terminology associated with AA. As was indicated previously, misunderstandings occur often as a result of poor or inaccurate dissemination of information about the details of the EEA. The clarification of these terms would be a prerequisite for any other communication efforts.

Finally, this framework's reference to consideration of different needs of internal stakeholders and a multitude of communication channels, provides very concrete advice to any practitioner. From a corporate communication perspective, such advice is as important as strategic advice. This type of advice (suggestions) completed the framework in terms of the three levels of communication activity, as was explained in the previous chapter.

4.3 ESTIMATING THE VALUE OF THE CODE FOR GOOD PRACTICE AND THE CONTRIBUTIONS BY THOMAS AND ROBERTSHAW

Four points about the Code for Good Practice (Department of Labour, 1999b) need to be emphasised when estimating its value compared to other sets of guidelines. Firstly, it clarifies the legal requirements in a logical business context and is in this respect more comprehensive than any of the frameworks mentioned previously. The emphasis on roles and responsibilities in the planning stage is congruent with the traditional (mechanistic) approach to transformational management: expected outcomes can be most accurately predicted when the appropriate tasks are assigned to specific people. Within the
context of the study it could be argued that these guidelines are of paramount importance in order to overcome or prevent similar confusion, as is the case with the meanings associated with the EEA. The existence of various guideline documents (from the Department of Labour) on the Internet proves that some effort is made to assist employers with this process.

The EEA’s description of designated employers’ “duty to inform” may also be misunderstood, but more importantly, mismanaged. (This issue was also mentioned in Chapters 1 and 3.) The Code of Good Practice for the EEA (1999) clarification on the communication, awareness and consultation dimensions are quite clear and comprehensive, but excludes a specific communication strategy. Many of the aspects mentioned in this code are reflected in Thomas and Robertshaw’s (cf. 1999) framework and communication strategy. For the purpose of comparing these frameworks within the parameters of this chapter, it is relevant to describe the contents of the Code of Good Practice for the EEA (Department of Labour, 1999b).

Managers should be informed of their obligations in terms of the Act, and training should be provided to them where particular skills do not exist. These views are congruent with Thomas and Robertshaw’s (cf. 1999) notions of leadership and the paradigm from which organisations should approach the EEA (cf. De Beer & Radley, 2000; Horwitz et al., 1996; and King Report II, 2002).

Finally, it seems that this framework, together with that of Thomas and Robertshaw (cf. 1999), provide the most comprehensive guidelines for organisations regarding the implementation and facilitation of communication. The comprehensive nature of both of these frameworks, specifically the communication strategies, makes them possible benchmarks for South African organisations. Based on this evaluation both frameworks are also included in the research design in an attempt to answer the research question.

Thomas and Robertshaw’s (cf. 1999) model for integrated thinking and framework for a communication strategy also provide much more insight regarding the subtleties of organisational dynamics and the influence thereof on the implementation of the EEA. It is conceptually much more advanced than the other frameworks and could serve as benchmark for all organisations that implement the EEA, or that would only seek pragmatic assistance regarding communication strategies or plans.
Thomas and Robertshaw (1999:29) argue that a comprehensive communication strategy should be formulated even before organisations embark on this transformational path. The key variable in the formulation of such a strategy is the dynamic nature of various stakeholders. The authors contend that the needs of employees need to be the foremost consideration: “It is here that major issues of job security and promotional opportunities are of concern, especially amongst white male employees” (Thomas & Robertshaw, 1999:29).

One dimension that is not adequately described by either the Code of Good Conduct for the EEA (Department of Labour, 1999b) or Thomas and Robertshaw’s (cf. 1999) work, is the continuous strategic management of relationships with external stakeholders. Communication management efforts for corporate profiling/strategic positioning is not specifically aimed at the external environment.

These remarks confirm that organisations could gain much by integrating the previously mentioned models and frameworks. But since transformational change management as a result of the EEA may differ from one organisation to another, this phenomenon cannot be encapsulated by (or restricted to) a single model or framework. Literature about the challenges South African business leaders face suggest that transformational leadership is both critical in an ever-changing environment. Thus also validating the description of transformational leadership as a “thinking science”, as was explained in Chapter 2. Based on these observations, it seems appropriate to formulate a conceptual framework that could be used to guide and evaluate future communication and corporate transformational efforts as a result of the EEA (or even the BEEA).

4.4 TOWARDS A CONCEPTUAL FRAMEWORK FOR COMMUNICATION ABOUT EMPLOYMENT EQUITY

The conceptualisation of an improved framework for managing communication about EE seems appropriate for two reasons. Firstly, the efforts of three traditional organisational disciplines, Corporate Communication, Human Resources and Employment Equity, need to be fully integrated. Integration of communication applies to the whole organisation. Secondly, the principles of the chaos perspective need to be reflected in a framework that focuses on transformational efforts as an intellectual effort
("thinking science") and accommodates the ever-changing needs of organisations in this context. Therefore the new suggestions are collectively referred to as a conceptual framework and not a model.

The conceptual framework is based on six broad principles: understanding the changing role of communication within transformational change management; appreciating the strategic alignment paradox, understanding the leadership paradox; corporate culture transformation; dialogue with stakeholders and organisational learning.

4.4.1 Understanding the changing role of communication within transformational change management

Communication, when defined as the sharing of meaning between people, is the process that enables employees to share information, create and co-create meaning and ultimately make decisions. This logic underscores the contribution of communication in this transformational context. Information changes continuously, based on the continuous changes in the internal and external environments of the organisation. This description will implicitly explain why the criteria for communication about the EEA in organisations cannot simply comprise elements such as “clarity”, “direction”, “roles” and “outcomes”. (As was explained previously, such qualities typify mechanistic models.)

Du Plooy-Cilliers (2001:141) identifies 14 dimensions for comparing communication in the mechanistic and organic worldviews, but for the purpose of this study only five themes are described. Firstly, communication flows freely. Ströh (1998:29-30) also highlights this fact. Wheatley (cf.1999) further describes the relationship between information and the creation of meaning as a natural occurrence within organisations. The purpose and direction of communication are re-defined: communication now facilitates understanding and conflicting views (Du Plooy-Cillers, 2001:141). This is congruent with the concept of diachronic communication, as mentioned in Chapter 1.

Both the organisational climate and climate for communication invite change and transformation instead of both resisting change or dialogue between the organisation and constituent parts. This view highlights the implicit relationship between communication practices and assumptions about the
organisation, as explained by the Power-Control perspective as described in Grunig (1992:23).

Fourthly, organisational learning takes place as a result of communication (Ströh, 1998:36). Communication facilitates the diffusion of both information and the interpretation of information (learning) throughout the organisation. The free flow of communication also opens up the possibility for all levels of the organisation to benefit or contribute to this learning process.

Finally, leadership and communication are viewed as inseparable. Leaders lead through communication, but primarily by means of appreciating and creating opportunities for the free flow of information and non-managerial employees' creativity (Du Plooy-Cilliers, 2001:141). This specific view means that traditional notions of leadership are reversed: leaders primarily serve through their new understanding of this natural organisational force. (These qualities are reflected in the chaos vocabulary of self-organising ability of systems and creativity, as described in Chapter 2.)

4.4.2 Understanding the strategic alignment paradox

As was explained throughout Chapter 2, the application of the chaos perspective highlights a number of paradoxes, and could also lead to the critical evaluation of aspects such as “strategic” and alignment”. These paradoxes are also apparent when evaluating possible ways in which organisations can manage communication about EE matters, as a transformational effort. In an effort to provide some answers to the apparent paradoxes, two models are presented and evaluated.

Firstly, Steyn and Puth (2000:53-76) conceptualised a model for the development of a corporate communication strategy that combines the dimensions of leadership, context and tactics. These authors also provide a comprehensive model for the different components of such a strategy, including the link to the corporate strategy; clarification of the internal and external organisational environments; identification of strategic stakeholders; identification and prioritising of key strategic issues; and the development of communication plans. This model focuses on the elevation of the contribution of the corporate communication division from purely tactical (functionary) practice to a key element of corporate strategy decision-making. This view has almost become axiomatic and no further discussion about the validity of this view is necessary within the context of this study.
In addition to this model, Steyn (cf. 2002) had conducted empirical research about the conceptualisation and contribution of the corporate communication strategist vs. the corporate communication manager. The views of this author are invaluable for the conceptual link between the possibilities of the corporate communication division and the realities of corporate transformation management.

Strategic research (including environmental scanning) and alignment of the corporate communication strategy are central tasks of such a strategist. When compared to the reality of change being the only constant of organisational life, the value of the corporate communication strategist as a key role player in a transformational process, seems almost too obvious. When measured against the qualitative dimensions of transformational change, as defined by the chaos theory perspective, the aforementioned model needed to be elaborated to allow for flexibility in many dimensions.

Secondly, Grobler (in Verwey & Du Plooy-Cilliers, 2003:204) incorporates all the theoretical assumptions, dimensions and elements of Steyn and Puth's (cf. 2000) model for a corporate communication strategy into a model for the alignment of strategic intent within the context of continuous change. These ideas are illustrated in figure 4.3 (on the next page).

The top half of this figure summarises the dimensions of strategically managed corporate communication. The emphasis on stakeholder management is central to this process. The five elements of the corporate strategy are also defined as the key dimensions of corporate transformation. (These do not need further explanation in this chapter.)

The potential of this model lies in the emphasis on flexibility in all the dimension of the bottom half of the figure 4.3, i.e. roles, phases, actions and outcomes. This model firstly refers to the fact that change, and for the purpose of this study also transformation, would require the most senior Communication practitioner to play not only a strategic or managerial role. The role of this individual will be contingent, based on the needs of the organisation and/or the transformational effort (Grobler in Verwey & du Plooy-Cilliers, 2003:204).
Chapter 4
Frameworks for managing communication about affirmative action in South Africa

### Figure 4.3
Aligning the corporate communication strategy with the corporate strategy

<table>
<thead>
<tr>
<th>Role</th>
<th>Phase</th>
<th>Action</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strategist</td>
<td>Strategic thinking/</td>
<td>Identify:</td>
<td>Contribution to Corporate Strategy</td>
</tr>
<tr>
<td></td>
<td>planning</td>
<td>Stakeholders, Issues</td>
<td></td>
</tr>
<tr>
<td>Manager</td>
<td>Communication planning</td>
<td>Formulate Goals</td>
<td>Corporate communication strategy/plans</td>
</tr>
<tr>
<td>Technician</td>
<td>Implementation</td>
<td>Set objectives</td>
<td>Action plans &amp; activities</td>
</tr>
</tbody>
</table>

*Source: Grobler (in Verwey and Du Plooy-Cilliers, 2003:204)*

Strategic thinking also needs to be translated into planning. When operating as communication manager, an individual will focus mainly on communication planning. And when operating at technician level, the implementation of plans would be the focus. Each of these roles also has distinct spheres of influence regarding actions (Grobler in Verwey & Du Plooy-Cilliers, 2003:204).

At the strategic level, stakeholders and the identification of issues are central, while the formulation of goals and objectives pertain to the managerial and technician levels respectively. Finally, outcomes are also stratified according to three roles: strategic outcomes are mainly influenced from the strategic role, corporate communication planning is influenced by the manager, while technicians bring different elements of the corporate communication strategy and plans to fruition through activities (Grobler in
Verwey & Du Plooy-Cilliers, 2003:204). These activities are the wide spectrum of traditional and emerging tactics associated with communication management.

The usefulness of this framework for transformational change communication can be evaluated along three dimensions, i.e. advice to other departments about the management of communication; the integration of communication efforts of the organisation; and the ability to absorb the qualitative dimensions from the chaos perspective. These three dimensions are again directly related to the research question of this study and the premise that communication is the vehicle through which organisational transformation will be effected. For the purpose of clarification, this link will again be described.

Organisations that implement the EEA as a transformational process will need to communicate the transformational vision, with or without the assistance of specialists in communication. But the assumptions from corporate communication theory assert that specialist knowledge from either a technical, managerial or strategic perspective would be the normative ideal. The manner in which organisations manage communication and/or allow leaders to implement the transformational strategy, also depends on organisational conditions.

When considering organisations’ duty to inform and consult internally about the EEA, it seems that Grobler’s (in Verwey & Du Plooy-Cilliers, 2003:204) description of both strategic, managerial and tactical levels would be utilised in all organisational divisions. When the requirements of lasting transformation are considered, it would seem appropriate that communication efforts by all divisions need to be integrated, instead of relying on the corporate communication function or senior corporate leadership.

It also seems as if Grobler’s (in Verwey & Du Plooy-Cilliers, 2003:204) model allows for flexibility in the structures or processes in the corporate communication division that will enable this function to both focus on current communication efforts and also the continuous scanning of the internal and external environments. Thus the scanning process is continuous in order to reflect the organisation’s need for continuous adaptation and learning. Finally, communication is the vehicle for diffusion of such learning:
the transformational goal is that individuals will contribute to and appreciate the set of organisational values that will allow the EEA to function effectively.

4.4.3 Understanding the leadership paradox

As was indicated in Chapter 2, leadership is now more closely associated with facilitation than management, merely being a figurehead or having symbolic decision-making power. Since Anderson and Ackerman Anderson’s (cf. 2001) conceptualisation of transformational change leadership is favoured in Chapter 2 and highlighted in Chapter 3, any framework for the management of communication about the EEA should also facilitate the ideals of “knowing, being and doing”.

These ideals can be achieved by emphasising the fact that leaders need to model the transformational vision and facilitate dialogue about the EE strategy in various contexts. Any communication strategy for EE should specify expectations about the contribution of formal leaders. The contexts may vary from interpersonal communication to team or departmental meetings. And although expectations should be articulated, the corporate strategy should contribute to the empowerment of leaders to achieve the aforementioned expectations. Without empowerment, traditional leaders may feel overwhelmed or neglect their responsibilities regarding EE amidst their existing list of responsibilities.

As was indicated in the previous section, flexibility regarding leadership and content should be viewed in combination. Flexibility also extends to informal leadership situations. Thus frameworks for the management of communication about the EEA should allow for flexibility regarding these two dimensions.

4.4.4 Corporate culture transformation

Based on the argument that individuals need to embrace a new set of organisational values as the first step of organisational transformation (De Beer, 2002:ii), it seems that any framework for the management of EE, should also indicate how corporate values will be addressed. Any communication
strategy aimed at supporting the EE strategy should address so-called “hidden barriers”, as defined by De Beer and Radley (cf. 2000).

One of the most complex hidden barriers to overcome is a corporate culture of intolerance or one that is based on the beliefs that typified Apartheid South Africa. According to De Beer (cf. 2002) and Thomas and Robertshaw (cf. 1999) the transformation of corporate values is at the core of “transformation” in relation to an EE strategy. The ideal set of values should at the very least focus on tolerance between races and the appreciation of subsequent diversity. These values reflect the sentiments of various authors about the appropriateness of the diversity management approach to the management of EE.

The almost too obvious implication is that a communication strategy for EE should focus on specific messages regarding the ideal set of corporate values that will articulate the vision of diversity and equality. Equality, as described in the preamble to the EEA, should be central to the transformational vision.

Finally, while the communication strategy should emphasise the ideal values, it should be flexible about the manner in which individuals (and groups) will engage with the values. Once again, a paradoxical situation develops when the success of the communication strategy is measured: it is unlikely that the most senior Communication practitioner will be able to convince other organisational decision-makers of the success of a communication strategy if the results are not easily measured. The question of how the abstract concept of transformation is measured, would certainly also contribute to the complex nature of planning and managing communication about EE matters.

Again both of these complexities should be addressed in the communication strategy: a variety of communication methods/techniques need to be specified for the dissemination of information about the ideal corporate values. And appropriate research methods should also be incorporated into the tracking of this continuous transformational process.
4.4.5 Dialogue with stakeholders

The research problem and the previous discussion both point to the need for understanding the nature or place of dialogue. The form of communication required to reach some form of consensus on the myriad of issues related to the implementation of the EEA, is dialogue.

Dialogue should firstly be understood as a phenomenon that resembles many of the elements of the co-orientation model as described by Dozier and Ehling (in Grunig, 1992:179–182) and the vehicle through which the relationships between stakeholders and organisations are maintained (cf. Post et al., 2002). All of the previous authors highlight the need and potential for two-way symmetrical communication goals and outcomes. The process of dialogue is based on constant interaction between and balancing of the interests or views of the organisation and those of publics.

Two-way symmetry is viewed as the normative ideal. However, this ideal should not be misunderstood as total balance between the two parties/entities involved. Grunig (cf. 1999) explains that his conceptualisation of two-way symmetry was never intended to reflect pure co-operation or accommodation of interests of publics across all situations. Grunig (1999:3) states that the mixed-motive model for communication management provides a much more accurate conceptualisation of this dialogical process.

Based on the researcher’s interpretation of the needs of organisations during the implementation of the EEA, it seems that the mixed-motive model for the management of communication is more realistic than pure cooperation for two reasons. The EEA requires compliance, which is in essence not negotiable, thus categorising the phenomenon as a one-way process. On the flipside, internal stakeholders\(^3\) evidently have multi-dimensional reactions to this transformational process. In order to arrive at the point of implementing the EEA and simultaneously ensuring organisational effectiveness, the interests of both sides need to be balanced.

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\(^3\) The terms public and stakeholder are used interchangeably.
Organisations that embark on this journey are in a double-bind: if they do not comply with the EEA and the new BEEA, they will be fined by Government, while they can arguably not really force employees to transform their deeply-held beliefs or attitudes toward issues of race, gender and disability. As was explained in Chapter 2, the decision to adapt to or contribute to a new set of organisational values, lies with each individual. At most, organisations can aspire to all employees valuing the essence of the transformed corporate culture. No guarantees exist for this process.

Dialogue is also viewed as the mode for creating meaning and the overarching model for establishing transformational values, specifically when the relationships between the organisation and other entities are valued (Spicer, 1997:215). Even though the objective of communication actions has not yet been discussed previously, the maintenance of relationships is regarded as a governing principle within the context of this study.

The implementation of the EEA brings about profound changes that affect the psychological contract between the organisation and employees or external stakeholders (including investors, dealers, competitors, suppliers etc.). This psychological contract with employees would include dimensions like job security and trust, as was described in the literature about reactions to AA. Against this background, it could also be argued that these dimensions of the psychological contract are at the core of why this transformational effort is deemed profoundly difficult for some employees from the non-designated groups.

The importance of the organisation's relationship with internal stakeholders in the context of implementing the EEA, is further highlighted by Grunig and Haung’s (in Ledingham & Bruning, 2000:30) conceptualisation of strategic publics. They argue that such publics are categorised as being of strategic importance based on the organisation's need to have a relationship with them. Based on these perspectives, any framework for implementing the EEA, should recognise the need for and allow for mechanisms to facilitate dialogue in order to manage the strategic relationship between the organisation and internal publics.
The relationship with external stakeholders is affected in a unique way as a result of both the EEA and the BEEA. As was explained in Chapter 3, the BEEA forces organisations to deal predominantly with suppliers (or other forms of business partnership) that are linked to the economic empowerment of non-whites. Although the BEEA is not a focal point of this study, the potential impact of this law should not be underestimated. And the same type of arguments about the top-down approach by Government could lead to similar debates about this law as is the case for the EAA.

Both of these laws necessarily have an impact on corporate profiling and relationships with current and potential investors. When business partners are considering new ventures, the profile of other entities in terms of the BEEA would also be a critical consideration. The EEA already requires that progress be reported annually by means of the EE Report and the EE Plan. As was mentioned previously, critics argue that communication on the basis of cyclical reports could hamper organisational transformation efforts when communication is interpreted as ending with the reporting or planning phases.

Furthermore, a danger to the process exists in the form of specifically external reporting. Reporting of progress regarding key appointments may be interpreted as “window-dressing” or “tokenism” vs. organisational transformation. One solution that has been proposed to avoid or overcome such a situation comes from the King Report II (2002). This report proposes that reporting on these matters (AA and empowerment) should be included in the Sustainability Report of each organisation. Although a debate about the validity of such a suggestion falls outside the scope of this study, the central idea of this suggestion echoes the principle requirement of communicating AA measures as a business imperative. Therefore, when considering frameworks for the management of communication about the EEA, the direct link between strategic business goals and transformation would need to be made explicit. Any communication strategy or plan would also have to refer to the ensuing management of strategic stakeholders.

4.4.6 Organisational learning

Ströh (1998:36) argues that employees should be empowered (enabled) to learn during times of change or transformation, as is the case in the context of the current research question. In order to
facilitate such organisational learning, the practice of communication needs to be aligned with the ideals of open, two-way (or at least consultative) interaction, a focus on teamwork and the availability of multiple communication mechanisms (Ströh, 1998:36).

Based on this description, any framework for the management of communication about the EEA should ideally emphasise how organisational learning will be facilitated and contribute to transformation. Corporate transformation is an infinite process and depends on organisational learning, also a process that is potentially infinite. Once again, communication is the vehicle through which learning can be facilitated through an organisation. Learning would have to start with individual transition, as proposed by French and Delahaye (cf. 1996). Individuals need to progress from transition to transformation. In order for individual transformation to contribute to group level and organisational transformation, as suggested by De Beer (2002:ii), experiences need to be shared in all directions.

Understanding the “true” nature and role of information, as a strange attractor, seems most appropriate in the context of organisational learning. When information about the organisation’s EE strategy is freely available and a climate for open communication (also debate) exists, employees would be able to take control of their own learning.

A paradox within the chaos perspective is apparent in the context of organisational learning: no guarantees exist for the willingness and ability of individuals to pursue information if not presented to them via traditional communication structures. A possible solution for this paradoxical situation may lie in the cultivation of a corporate culture of self-directed leadership, as suggested by Du Plooy-Cilliers (2003:33). As was explained in Chapter 2, the free flow (availability) of information would also be critical in this corporate culture. But the ultimate decision of to align his/her values with that of the transformational vision still lies with the individual.

4.5 CONCLUSION

Communication is central to all (traditional and emergent) perspectives on transformational change management. Following this argument, communication is also the vehicle through which organisational
transformation will be achieved in relation to an EE strategy. The relevance of communication in this context is confirmed by the literature review, as well as the legal requirements. It would seem that organisations need to find a wise balance between managing communication in relation to EE strategies for legal compliance and lasting organisational transformation. Transformation of corporate values is the strategic vision. But, as opposed to deterministic thinking, the outcomes cannot be guaranteed. Although no ideal way could or should exist for this process, the chaos perspective provides a conceptual framework that transcends all differences between organisations from different sectors.