

# Diversity, Inclusion and Transparency in Rail Companies' Communication

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*For my father, with endless love and gratitude*

## Abstract

The recent events of the Covid-19 pandemic and the renewed upsurge of social movements in the late 2010s, such as Black Lives Matter and #MeToo, have brought public attention to the question of inequality and, for that matter, to Equality, Diversity and Inclusion (EDI). Set against this background, the aim of the study is to investigate whether, and if so how, EDI is transparently framed in the CSR reports belonging to a sample of rail companies operating in different countries and continents. In an effort to explore the companies' attitudes towards EDI as a consequence of the Covid-19 pandemic, the analysis examines a sample of CSR reports that were disclosed in 2018 (pre-Covid-19) and 2022 (post-Covid-19). In particular, the sections of the reports covering EDI topics are scrutinized quantitatively with the support of corpus linguistics tools to identify frequent lexico-grammatical patterns, and qualitatively through discourse analysis to verify whether the information provided is transparent, namely complete, understandable and reliable. The comparative and micro-diachronic study sets out to highlight similarities and differences in the discourse strategies adopted by the rail companies for (un)transparent reporting of information relating to diversity and inclusion issues.

**Keywords:** Corporate social responsibility, Equality, Diversity, Inclusion, Transparency

## 1. Introduction

In recent years, the Covid-19 pandemic, the revival of social movements (such as Black Lives Matter and #MeToo), and greater sensitivity in society towards inequality and injustice have spotlighted social issues including equality, diversity and inclusion (EDI). As a consequence, organizations and companies have started to pay new attention to these ethical aspects and distribute more information about their social goals and practices to gain stakeholders' consensus.

Drawing on the existing literature, EDI has been extensively investigated in the workplace from a management perspective and in its chronological shift from equality to diversity and inclusion (Maxwell et al., 2001; Mazzei & Ravazzani, 2012; Mor Barak, 2005; Oswick & Noon, 2014; Roberson 2004; Thomas & Ely, 1996). Equality, which held the stage from the 1970s up to early 1990s, is founded on the belief that every individual should have equal chances and opportunities. In the 1990s the notion of diversity gained popularity, and prominence started to be given to the value of differences within the workforce. These include both surface level characteristics (i.e. age, ethnicity, gender, physical attributes/abilities, race and sexual orientation), and deeper level features (i.e. education, geographic location, income, marital status, military experience, parental status, religious beliefs and work experience; see Litvin, 1997). Apart from legal obligations and moral considerations, companies' practice of diversity has been mainly driven by the utilitarian and economic benefits arising from a diverse workforce, such as increased innovation, creativity, job satisfaction, and a better understanding of customer needs (Byrd & Sparkman, 2022; Johns et al., 2012). Finally, in the 2000s greater importance was attributed to the notion of inclusion, which is intended as employees' participation, empowerment and contribution in organizations. In other words, inclusion "is about celebrating difference as an asset, since everyone is unique, and recognising that everyone can make a contribution" (Evans, 2006, p. 26, quoted in Oswick & Noon, 2014, p. 26).

While EDI has been widely studied in management from an organizational approach (see Mazzei & Ravazzani, 2012; Thomas & Ely, 1996), little work has been done on how it is linguistically and discursively constructed by companies. Apart from some research on the communication of diversity in companies' websites and other forms of corporate communication (Jonsen et al., 2021; Malavasi, 2023a, 2023b; Nocella, 2023; Point & Singh, 2003; Ponten, 2015; Singh & Point, 2006; Turnbull, 2023; Uysal, 2013), no interest has been devoted to the study of transparent communication of EDI. In the current context of public skepticism surrounding companies and their practices, transparency has gained ground as a key concern for firms in the disclosure of both financial and non-financial information (Coombs and Holladay, 2013; Kim & Lee, 2018; Lee & Chung, 2023). Notwithstanding the unquestionable pivotal role of transparent communication for the image-building and reputation of a company, transparency remains an ambiguous concept (Albu & Flyverbom, 2016). While it has been traditionally associated with the disclosure of more information, nowadays transparency has been conceptualized in relation to information quality and in consideration of receivers' feedback to the organization's message (Coombs & Holladay, 2013; Kim & Lee, 2018). Quoting Rawlins (2009, p. 74), transparency has "three important

elements: information that is truthful, substantial, and useful; participation of stakeholders in identifying the information they need; and objective, balanced reporting of an organization's activities and policies that holds the organization accountable". More to the point, Schnackenberg and Tomlinson (2016, p. 1794; Schnackenberg et al., 2021) suggest that "transparency appears to be a function of three theoretically viable and managerially relevant factors: disclosure, clarity, and accuracy". Specifically, disclosure is intended as "the perception that relevant information is made available to the receiver" in a timely manner; clarity is "the perceived level of lucidity and comprehensibility of information received from a sender"; and accuracy or information reliability is defined as "the extent to which information is reflective of reality rather than exaggerated or biased" (Schnackenberg et al., 2021, pp. 1631, 1632, 1629; Schnackenberg & Tomlinson, 2016, pp. 1792-1794).

In view of these considerations and limited research on transparency in EDI communication, the present study aims to examine whether and how these social topics are transparently or opaquely framed in a sample of Corporate Social Responsibility (CSR) reports belonging to three companies in the rail sector. The research findings are discussed in Section 3 after a description of the materials and methods adopted (Section 2). Finally, the Conclusion section sheds light on the construction of transparency in the discussion of EDI.

## **2. Materials and Methods**

In order to investigate EDI communication in its (un)transparent nature and its variation as a consequence of the Covid-19 outbreak, the research considered the case study of three rail companies headquartered in three different countries and continents (Note 1), namely West Japan Rail Company in Japan (Asia), Deutsche Bahn in Germany (Europe), and Amtrak in the USA (North America) (Note 2). The focus of the analysis was on rail companies as transport is a sector that was strongly affected by the pandemic, and in which public perceptions of transparency have to be carefully managed. Thus, as a consequence of the renewed attention brought by Covid-19 to equality, diversity and inclusion, the analysis examined a sample of Sustainability and Integrated Reports (Note 3) that were disclosed in 2018 (pre-Covid-19) and 2022 (post-Covid-19). In particular, the sections of the reports covering EDI topics, such as "Human Resources", "Social" and "Employees", were selected and collected in several small corpora, one for each document (see Table 1). The visual resources with linguistic components were included in each database, while images, tables and graphs with almost no linguistic content were not added to the corpus but tagged and considered in the study because of their significant contribution to transparency.

Table 1. Companies and reports selected for the study

Continent	Country	Rail Company	Type of report: 2018	Social section (no. of words)	Type of report: 2022	Social section (no. of words)
Asia	Japan	West Japan Railway company	Annual Report	546	Integrated Report	3,376
Europe	Germany	Deutsche Bahn	Integrated Report	3,305	Integrated Report	9,177
North America	USA	Amtrak	Sustainability Report	0	Sustainability Report	2,441

For the analysis of the transparent discursive construction of equality, diversity and inclusion before and after the Covid-19 outbreak, the study adopted a corpus-informed, qualitative and comparative approach. With the support of corpus linguistics tools and the software suite *AntConc 3.5.8* (Anthony 2019), each document was investigated in a selection of lexical items related to EDI and occurring among the top 20 most frequent words. Manual analysis of concordances and discourses surrounding the identified key words was meant to verify whether the information provided by the three rail companies on their social impact is transparent vs. opaque. To this end, from a more qualitative perspective, transparency was examined along the three dimensions proposed by Schnackenberg and Tomlinson (2016): disclosure or information amount, relevance and completeness; clarity or understandability of information; and accuracy or information reliability. The discursive strategies for disclosing EDI were diachronically compared to identify similarities and differences in (un)transparent reporting of information.

### 3. Results

For the purpose of this research, each railway operator was examined in the discursive and rhetorical techniques employed in 2018 vs. 2022 for the transparent or vague communication of EDI topics. In particular, the analysis scrutinized the discourses surrounding the most frequently occurring words in each corpus, which were assumed to reflect the most salient social concerns of each company (see Table 2).

Table 2. Most frequent words with ordinal rank and number of occurrences

West Japan 2018	West Japan 2022	Deutsche Bahn 2018	Deutsche Bahn 2022	Amtrak 2018	Amtrak 2022
6 human (14 occurrences)	6 employees (66 occurrences)	9 employees (41 occurrences)	7 employees (139 occurrences)	---	9 employees (38 occurrences)
8 resources (12 occurrences)	10 human (45 occurrences)			---	18 diversity (17 occurrences)
10 growth (8 occurrences)	16 rights (27 occurrences)			---	19 training (17 occurrences)
18 diversity (6 occurrences)	17 work (26 occurrences)			---	20 employee (16 occurrences)
	19 training (22 occurrences)			---	

The framing of equality, diversity and inclusion around the key words listed above is investigated first in the Japanese reports (Subsection 3.1.), then in the German disclosures (Subsection 3.2.), and finally in the North American materials (Subsection 3.3.).

### 3.1 West Japan Railway

The report published by the Japanese company in 2018 exemplifies limited disclosure of timely and relevant information regarding EDI. Indeed, as evidenced by the size of the corpus (see Table 1), the document includes a short section about social topics, where future commitments and general claims are prominent. This is corroborated by Examples 1 to 4 (my emphasis as in the other quotations) that show the company's considerable yet vaguely defined efforts to foster *human resource cultivation*, boost employees' *diversity*, and support their *growth*.

- (1) We strive to create a climate where *a variety of human resources can flourish, show their ability to the fullest, and ultimately create results*. We are working to create a state of operations where *each and every one of a variety of personnel can maximize their productivity*.

(2) *Human Resource Cultivation*

- *Initiatives to improve practical skills* and facilitate the passing on of technical expertise in specialized fields for the coming future
- (3) *Human resources* comprise the *driving force* toward this goal, and the *growth of each individual* is a major power of JR-West.
- (4) In order to become a business group with *diversity as weapon*, we are promoting *diversity and workstyle reforms*, which will allow a variety *human resources* to be active in the workplace.

Broad and abstract statements about promising goals for the future are not supported by data or narratives of performance, thus compromising the accuracy and reliability of EDI reporting, and hindering its transparency.

In contrast, more extensive information on equality, diversity and inclusion was disclosed by the Japanese railway company in its 2022 report. The greater length of the ‘social’ section of the document makes it plausible to hypothesize that these issues have gained increasing relevance in the years following the Covid-19 outbreak. While maintaining the same focus on the workforce or *human resources*, their *training* (Example 5), and *motivation and work engagement* (Example 6), the 2022 document turns out to feature more precise and specific information, including, for instance, references to such diversity categories as *employees with disabilities* (Example 7) and *female employees* (Example 8).

- (5) Cultivation program Propelled by a desire to achieve our vision of *cultivating human resources*, we encourage the growth of each person by offering group study and encouraging self-study built on a foundation of on-the-job-*training* (OJT) in every workplace.
- (6) Improving *work engagement* To ascertain *employee motivation and work engagement*, we conduct questionnaires targeting all employees and group analyses using stress checks. By offering feedback about the results to individual workplaces and encouraging the autonomous identification and resolution of issues, we are working to increase the percentage of lively workplaces where employees experience low stress, feel motivated, and do their jobs enthusiastically.
- (7) Reflecting our desire to become a corporate group where a diverse range of people can make the most of their individuality and abilities while working enthusiastically, regardless of whether they have any disabilities, we are hiring *employees with disabilities* throughout the Group, centered on special subsidiary JR-West Iwill Co., Ltd. *Some 180 employees with disabilities* fulfill responsibilities in fields such as printing and healthcare at JR-West Iwill.
- (8) Currently, *female employees* account for about 15% of our total workforce, and the number of women actively working in managerial and supervisory positions is steadily growing. In order to further encourage women to take on an active role in their careers, the new action plan that started in fiscal 2023 includes measures to create opportunities by, for

*example, providing information and education that aid in long-term career development, and to provide support for health issues that are unique to women.*

As substantiated by Extracts 5 to 9, the Japanese group’s care for its employees and the wider *society* is mainly expressed through general and quite composite claims about commitments and, to a lesser extent, statements describing activities and adherence to internal and international norms.

(9) To more clearly delineate our stance on human rights initiatives, which form the basis of such activities, we formulated the ***JR-West Group Basic Policy on Human Rights in April 2019***, drawing on a number of international norms related to human rights, including ***the United Nations Guiding Principles on Business and Human Rights***. *We pursue initiatives and business activities that respect the human rights of all people so that we can help create a “safe and comfortable society filled with meetings among people and smiles.”*

In addition to scarce emphasis on performance, the report also shows a limited amount of data and tables, which are generally not commented on in the accompanying text (Figure 1). While reporting figures may allow an assessment of trends or performance, it fails to demonstrate the company’s authentic and transparent support for EDI if data and what they signify are not described (Coombs & Holladay, 2013).

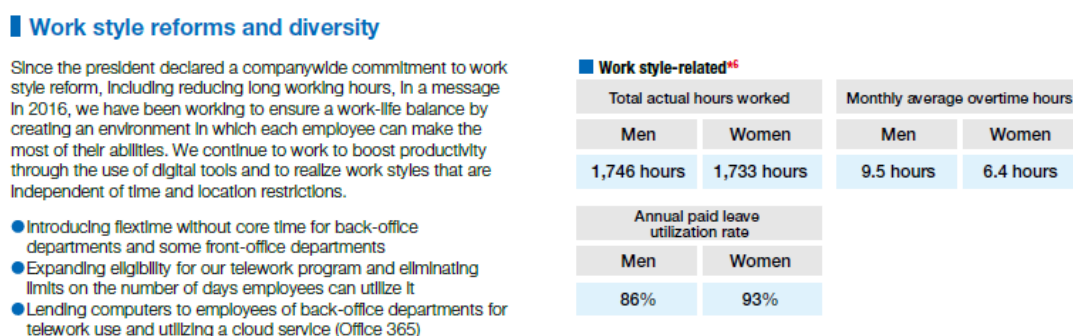


Figure 1

As a result, vague numerical information was found to marginally contribute to ascribing reliability and trustworthiness to EDI reporting. The transparency of the JR-West Group’s document for the year 2022 is further compromised by complex and convoluted language constructions, which make EDI messages elusive, cryptic and quite difficult to comprehend. However, the micro-diachronic analysis of the documents under consideration suggests that some efforts have been directed by the Japanese railway operator towards more complete, relevant and hence transparent disclosure of EDI information.

### 3.2 Deutsche Bahn

The Integrated Report published by Deutsche Bahn in 2018 includes a six-page long section which mostly covers topics related to *talent acquisition, personnel development, employee satisfaction* as well as inclusion. This is also evidenced by close inspection of the occurrences

of *employees* in its wider co-text. Indeed, emphasis is placed on the opportunities offered to the workforce for their development and participation in corporate activities (Examples 10 and 11), while sparse consideration is given to the promotion of diversity (Example 12).

(10) The online learning platform DB Lernwelt allows *employees and managers to continue their training using computers*. The platform provides over 200 courses developed by experts that can be accessed wherever and whenever is convenient, with the range being expanded on a regular basis. As part of *the Training the future (Wir bilden Zukunft) project*, DB Lernwelt helps users develop their expertise in the areas of digitalization, operational excellence and performance.

(11) To remain attractive as an employer, *we offer our employees a wide range of tasks and activities with a high level of responsibility, attractive employment conditions and a corporate culture that is perceived as being based on partnership and fit for the future*. Our indicator for employer attractiveness is calculated on the basis of the employer rankings published by trendence.

(12) In April 2018, about 500 *female* DB executives met at the second *DB Female Managers Lounge on the subject "More women at the top - how we can help promote change."* *This initiative aims to promote networking and increase the visibility of female executives.* [...] As a member of the Diversity Charter, we use the 6th German Diversity Day 2018 *to raise awareness of the subject amongst DB employees.*

The whole section of the report appears to be permeated with updated but rather technical and numerical information as well as references to GRI standards (Example 13), which, while instilling accuracy and reliability, seem to be partially tailored to meet readers' needs for clarity and understandability.

(13) **GRI 401-1** New hires at record levels In the year under review, recruitment in Germany at DB Group reached its highest level ever (**20,815 employees** without young professionals). There are several reasons behind our employment campaign: firstly, DB Group is growing, with roles involving new IT skills expanding particularly quickly. Secondly, about half of the workforce in Germany is set to retire over the next ten years, meaning that their jobs will have to be filled.

A similar approach was adopted by Deutsche Bahn to draw up its 2022 report, which was observed to include longer and more detailed portions of text dedicated to social topics. This is also shown by the size of the corpus, which is almost three times as big as the 2018 one. The "Employees" section of the DB 2022 Integrated Report is pervaded by references to the Management Board, procedures (Example 14), initiatives (Example 15), as well as internal and national policies (Example 16).

(14) DB Group's *commitment to the diversity of its employees* is anchored in *the Strong Rail strategy. Every member of the Management Board has assumed responsibility for one dimension of diversity*, with Martin Seiler, Member of the Management Board responsible for Human Resources and Legal, responsible for the topic as a whole. In addition, *the diversity managers of the business units* are available to employees as direct contact



persons if they have any issues regarding diversity. *Employees with specific diversity concerns are also supported by various bodies, such as the Group’s representative body for disabled persons or the “Social and cultural integration” project.*

- (15) In 2022, we continued to implement a wide range of measures to ensure equal opportunities across genders and to create an inclusive working environment for all employees under the banner of *the “Einziganders.” (Uniquely Different) initiative*. These include further flexibility in working conditions with the introduction of “*Wo Du Willst-Jobs*” (“*Jobs where you want*”), in which employees can freely choose their place of employment within Germany, or the expansion of *the intra-Group initiative “Frau Dich!” (Woman up!)* which offers exclusive career advice for women.
- (16) In Germany, around **221,000 employees** from over 100 nations work for DB Group and about **52,500** of them are **women**. The share of women in management positions by organizational structure, including companies covered by *the Act for the Equal Participation of Women and Men in Management Positions (Gesetz für die gleichberechtigte Teilhabe von Frauen und Männern an Führungspositionen; FuPoG II)*, stood at 27.0% at all levels as of December 31, 2022 (as of December 31, 2021: 25.4%).

As highlighted by the previous examples and the examination of *employees* in its concordance lines, performance-related claims are recurrently utilized by DB together with numerical data to support its devotion to diversity and inclusion with objective and concrete evidence (Figure 2).

MANAGEMENT LEVELS OF EXECUTIVES AND MEMBERS OF THE SUPERVISORY BOARD BY GENDER AS OF DEC 31 / NP	2022	2021	2020
Supervisory Board	20	20	20
Share of women (%)	35.0	30.0	35.0
Senior executives	253	252	243
Share of women (%)	21.7	19.0	16.9
Upper management	1,063	1,072	1,039
Share of women (%)	21.7	19.9	18.4
Middle management	2,508	2,464	2,382
Share of women (%)	24.0	22.2	22.0
<b>Total executives (excluding Supervisory Board)</b>	<b>3,824</b>	<b>3,788</b>	<b>3,664</b>
Share of women (%)	23.2	21.3	20.7

Germany (companies with about 98% of domestic employees).

The share of women among executives increased in 2022, demonstrating our efforts to increase the number of women in management. The increase in executives resulted mainly from the increased number of employees.

Figure 2

Although enhancing readers’ perception of information completeness, factuality and accuracy, the complexity and technicality of the EDI messages and visual aids that characterize the 2018 disclosure and, more prominently, the 2022 report seem to jeopardize their clarity and hence their transparency.

### 3.3 Amtrak

As regards the American railway operator, inspection of Table 1 reveals that its 2018

Sustainability Report does not include any sections specifically dedicated to social topics. This is counterbalanced by greater attention paid by Amtrak to EDI in its 2022 document. The manual reading of the passages featuring frequent lexical items, such as *employee(s)*, *diversity* and *training*, suggests that descriptions of promising goals and concrete programs are strategically merged together and mutually balanced.

(17) At Amtrak, we view ***Diversity, Inclusion and Belonging*** (DI&B) as a journey, not a destination. *We believe prioritizing DI&B is critical to creating a culture where all employees feel seen, heard and welcome to bring their full authentic selves to work. We have spent the past three years building our DI&B department strategy and program areas and continuously improve our offerings to our teams by listening to feedback and remaining open to growth.*

(18) As our workforce evolves, *learning to respect and celebrate each other's differences will be key to promoting collaboration and successful outcomes. That's why we are investing in providing ongoing training opportunities and creating a more inclusive environment for all of our employees.*

(19) Our DI&B is supported by our Executive ***Diversity*** Council, which includes members of the Executive Leadership Team and Senior Leadership Team who sponsor employee resource groups. [...] *In FY22, we enhanced existing programs across our three focus areas: People, Workplace and Community. Highlights from FY22 include:*

- *Joining the CEO Action for Diversity and Inclusion — Amtrak CEO Stephen Gardner signed the largest CEO-driven business commitment to advance diversity and inclusion in the workplace.*

Albeit not extensively and accurately disclosed, timely and relevant information is communicated in a rather clear manner, thus increasing its understandability on the part of a multifarious audience of expert and non-expert readers. This also holds true for figures, tables and graphs, which turn out to be quite easy to interpret (Figure 3). In some cases (Figure 4), the intelligibility of data is further enhanced by brief explanations or comments in the accompanying text.

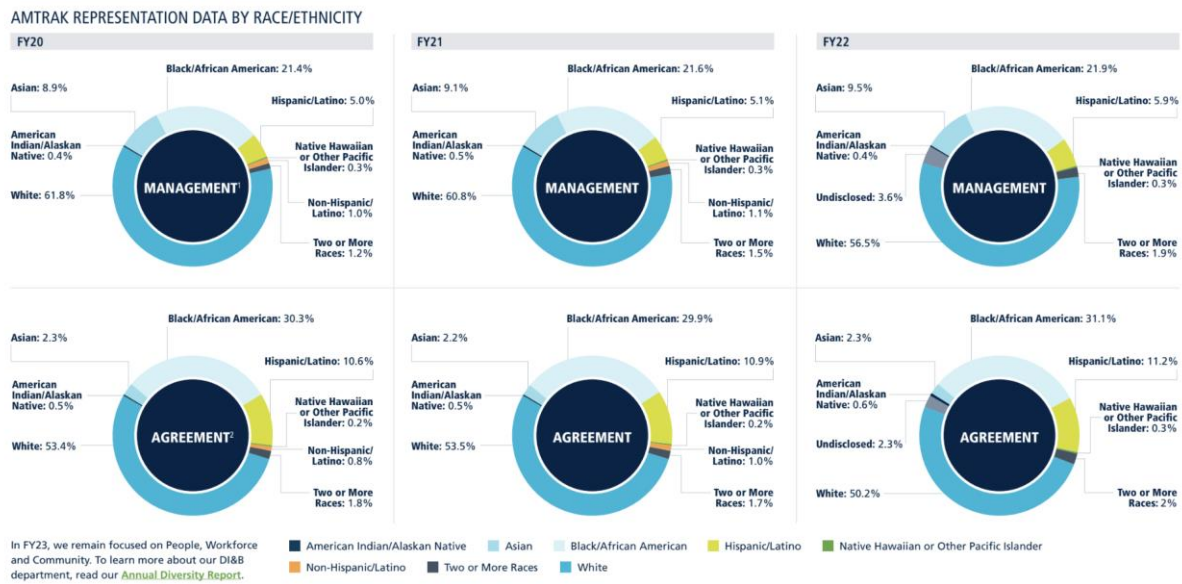


Figure 3

In FY22, our FRA reported employee injury rate remained flat versus previous year, though we achieved a reduction in lost time injuries and severity rate. These reductions were achieved through targeted mitigations in our operating divisions and increased engagement between managers, supervisors and employees. Our Operating Practices change in response to incidents that occur and address safety issues as they arise.

Employee Injury Rate (per 200,000 working hours)		
FY20	FY21	FY22
2.78	3.36	3.35

Figure 4

The comparative study of Amtrak’s documents for the years 2018 and 2022 confirms that awareness of social issues has been increasing in the post-Covid-19 era. In addition to the more explicit discussion of EDI topics, the 2022 report was observed to mainly derive its transparency from the company’s ability to provide readers with rather digestible, yet somewhat imprecise, information. In addition to clarity, the factuality and credibility of the messages conveyed, which integrate corporate goals and ‘concrete’ activities, were found to confer transparency to the disclosure.

#### 4. Conclusion

The comparative analysis of the 2018 vs. 2022 reports in their sections on EDI has revealed an increased focus on concepts related to equality, diversity and inclusion. Indeed, in the more recent materials, the three rail companies selected for the study were found to disclose a larger amount and wider range of information on their commitment to the integration of diversity in the workplace, and support for worker inclusion, participation and empowerment.

This can be interpreted as a result of the growing public stand against the social issues that the Covid-19 outbreak has exacerbated, such as inequality, discrimination and exclusion.

However, the examination of transparency as a discursive, multimodal and dynamic construction developed in CSR communication has shed light on the different strategies adopted by the three railway operators to disclose EDI information. More to the point, the analysis of the dimensions of transparency, i.e. disclosure, clarity and accuracy, revealed that in the more recent reports, Amtrak attempted to balance them, while DB gave major prominence to information completeness and reliability, and JR-West Group partially adopted the strategies for transparency creation. Furthermore, worthy of note is Amtrak's efforts to tailor its messages to stakeholders' needs for clarity, thus privileging the relational or two-dimensional nature of transparency. On the other hand, a more unidimensional and firm-centered approach was chosen by DB and JR-West Group, whose communication practices appear to partly accommodate stakeholders' expectations in terms of information simplicity and understandability.

As such, the findings from this analysis seem to confirm the pivotal role played by language in combination with other semiotic resources, such as visual aids, to produce communications that are seen as efficient, reliable and transparent. Specifically, the current study further highlights the importance of the interplay between the three dimensions of transparency, which should not operate in isolation but have to be combined together to achieve the goal of maximizing transparent reporting. Notably, the centrality of understanding the perspective of readers and stakeholders for a proper creation of transparency should not be underestimated. Evidence from this research strongly supports the view that "managing transparency is a complicated endeavor requiring organizations to balance internally defined objectives against the interests of divergent stakeholder groups" (Schnackenberg & Tomlinson 2016, p. 1801).

Despite the limited number of texts considered in this analysis, it is hoped that the present study has offered insights into the complexity of transparency and its framing. Studying a wider range of language strategies and forms of corporate communication can offer a better understanding of both companies' transparent vs. opaque reporting practices and the interconnectedness between transparency and stakeholder loyalty.

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## Notes

Note 1. A small corpus and a selection of companies were analyzed as this is intended to be a pilot study, which is part of a larger project dealing with the disclosure of EDI in a broader range of corporate communications.

Note 2. The selection of these companies was motivated by their listing on international sustainable indices and rankings such as Global Data (<https://www.globaldata.com/esg/companies/sustainable-railways-operators/sustainable>).

Note 3. When CSR or Sustainability documents were not available, Integrated Reports and Annual Reports were considered in the analysis.

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