

Journalistic Review:

Conflict of Interest and CBC News coverage of RBC and the Temporary Foreign Worker Program

Scope of Review

This review was conducted by the Director of Journalistic Public Accountability and Engagement with the assistance of a Senior Human Resources Manager.

17 CBC employees were interviewed either in person, on phone or via email. 11 of these employees were CMG members, and the remaining six were members of News & Centres Management.

In addition, this journalistic review included a number of informal conversations and a thorough review of relevant articles, programs and interviews surrounding this file. The review also looked at external analysis from an independent research firm that analyzes media coverage of the banking sector.

The key subjects of journalistic scrutiny:

1. A series of stories from April, 2013 that involved RBC and the Temporary Foreign Worker Program.
2. CBC journalism relating to RBC since 2013.
3. Any other CBC journalism linked to the allegations of conflict of interest.
4. The obligations CBC employees have to disclose potential conflicts of Interest.

The “RBC” stories of April 2013

CBC reporter Kathy Tomlinson began the pursuit of this story after being contacted by an audience member. Tomlinson is the lead reporter for “Go Public”, CBC News’ investigative team which generates accountability stories based on information from the audience.

Tomlinson was told that some employees of the Royal Bank of Canada (RBC) were losing their jobs as a result of outsourcing, primarily in the IT department, and that they were being forced to train some of the very foreign workers who were replacing them, and that these foreign workers may be in Canada improperly.

As Tomlinson launched her investigation, she attained an impressive amount of evidence to support the premise of the story.

It turned out that the foreign workers were there on behalf of a contractor called iGate (RBC and iGate had a long-term relationship, and iGate's base in India was ultimately where the outsourced work would be going).

In addition to talking to several RBC employees, Tomlinson and her team also spoke to several iGate employees, and had an internal document that showed iGate was an extensive user of the Temporary Foreign Worker Program.

The TFWP is a federal program which aims to fill "genuine and acute labour needs" in Canada where there are not Canadians able or willing to do the work. The most commonly understood example is seasonal agricultural workers who come to Canada from other countries.

The federal government has said it was never intended to be a way to bring in foreigners temporarily so that it could facilitate the outsourcing of work.

Tomlinson was able to confirm that iGate had employees supporting its work for RBC brought into Canada through either the TFWP or another program known as intra-company transfers, which is a category outlined by the federal government allowing companies to temporarily transfer employees to Canada for the purpose of improving management effectiveness, expanding Canadian exports and enhancing competitiveness in overseas markets.

Again, the work being done for RBC would not ordinarily meet the intended goal of such transfers.

That does not necessarily mean that either iGate or RBC broke any rules. There remained no evidence that either company did anything illegal or without approval. It simply means that what they were doing did not align with common understanding of what these programs were set out to do.

But Tomlinson had confirmed that iGate had brought workers in under these visa programs. She had confirmed the same with the federal government. She also obtained internal RBC documents confirming the scope of impending layoffs related to the outsourcing.

The one unknown was whether the employees brought in to iGate/RBC under these two programs were stationed with the bank's IT department (or Human Resources, where a smaller number of similarly-affected roles existed), or were in other areas of RBC. Knowing that detail would not have changed the outline of the story. But it might have helped fend off the dispute down the road with Amanda Lang (more on that later).

The confirmation and dialogue with the federal government, particularly the department of HRSDC (Human Resources and Skills Development Canada, now known as ESDC, Employment and Social Development Canada), alerted Tomlinson to the potential of the story.

In the days before the story broke, an aide to the minister told Tomlinson off-the-record that "this was big, and we are very concerned." There were suggestions that the government would not wait until broadcast before reacting, but Tomlinson said the "Go Public" story was scheduled to air on Monday April 8, 2013 and hoped that nothing would happen before then.

Indeed, that was the plan - Tomlinson's story was to roll out in the usual fashion of Go Public stories on the Monday.

However, plans changed when the federal government decided to get ahead of the story.

On Saturday, April 6th, HRSDC issued a statement saying the following:

"We have recently learned of allegations that RBC could be replacing Canadian workers by contracting with iGate, which is filling some of the roles with temporary foreign workers. If true, this situation is unacceptable.

"The purpose of the Temporary Foreign Worker Program is to fill acute labour needs when Canadians are not available for the work required. It was never intended as a means to bring in temporary foreign workers in order to replace already-employed Canadian workers.

"I have instructed my department to work with Citizenship and Immigration Canada to determine the next steps."

CBC's rollout plan had to change. So a [story was printed online that Saturday](#) and the main Go Public story was now rolled out for broadcast on Sunday.

RBC had rejected invitations to comment as the story was being put together. But after the unusual statement on Saturday from Ottawa, there was interest from all over the country. The head of RBC's Human Resources department gave an interview to CBC News Network on Sunday defending the bank's actions. Meanwhile, public reaction was intense for a weekend - a number of RBC customers saying on social media that they would close their accounts.

By Monday (the original rollout date) the news service had to regroup and determine a new strategy. There were some obvious angles to follow, such as what the federal government would or should do. And there was new information pouring in, including evidence that RBC was in no way the only bank to be conducting its affairs in this manner - pretty much all of the big banks could be implicated in a similar way.

This is where Amanda Lang comes into the picture. Neither she nor the business unit had been privy to any conversations around this story as it was being investigated or initially reported. This is not unusual - investigative reporters tend to keep a close circle around their information.

Upon seeing the story, Lang believed that there were problems with it. Primarily, she was concerned that the report was conflating possible abuse of the TFWP with outsourcing as a whole. As she spoke to officials at RBC, she was told they had followed all the rules, that iGate as the contractor was responsible for what was happening. But even then, they told Lang that -- at most -- one employee within RBC's IT department had arrived there through the Temporary Foreign Worker Program.

Lang voiced concerns about the story to a producer at The National. This producer had been the liaison with that program for both Lang and Tomlinson, and was well positioned to understand the perspectives of both. Lang argued that our coverage was unfair to RBC, which may not have been doing anything wrong.

This set off a series of conversations on that Monday about the story via email, in person and via phone calls. We will elaborate more on one particular call in a moment.

The end result in terms of news programming was this: Tomlinson proceeded with a story for television programs; Tom Parry from the Parliamentary bureau filed for radio programs, and Amanda Lang conducted an interview with RBC CEO Gord Nixon for the Lang and O'Leary program. An extended clip of that interview, along with a Lang debrief, was on The National. Digital stories and updates continued throughout, incorporating all the elements as they happened.

CBC's journalism here appears to have been very strong. And the course of events bore that out. Within three days, RBC issued a public apology. Within three weeks, the federal government announced changes to tighten up the TFW program and prevent the very scenario Tomlinson's stories outlined.

At the same time, Lang's critique of the stories is technically correct. Neither RBC nor iGate were shown to have broken the rules. And she was correct to identify how easy it is to confuse the distinction between misusing a federal program and debating the merits of outsourcing as a whole. It seems likely that the visceral public reaction was about outsourcing and the indignity that the RBC employees endured much more than it was about whether someone skirted the rules in an obscure federal program.

But that public reaction is not the fault of Kathy Tomlinson. She told a real story here about Canadians who were being treated poorly by the employer, and how the employer (or, in this case its contractor) were able to do so by means that went against the spirit of legislation.

While CBC News might have been able to do more in hindsight to frame the variety of issues from the outset, it does not detract at all from the excellent journalism here. A major issue was identified, and it prompted change. RBC was given multiple, high-profile opportunities to defend itself on our airwaves. And the issue was examined from many different angles and perspectives. It also set the stage for even more quality journalism months later about other abuses of the Temporary Foreign Worker Program by other kinds of business including McDonald's and Tim Horton's. These were more cut and dried stories than the RBC case, and it should be noted that Lang supported them.

Amanda Lang's journalism on the RBC story

There are two main elements we examined here:

- (1) Lang's interventions about the overall story
- (2) Lang's interview with Gord Nixon, the head of RBC

Lang, as indicated, had not been aware of the RBC story as it was being gathered and put together. When she became aware of it on that Monday, she voiced her opinion on it. This is her job, and she was right to do so. As our senior business correspondent, Lang has a responsibility not only to do her own reporting, but to contribute to our overall journalism around business and the economy. That includes questioning stories that other CBC News staff are telling, and arguing her perspective of what makes good, accurate, relevant journalism.

There has been some public discussion about a conference call in which Tomlinson, Lang, and other journalists from Ottawa, Vancouver and Toronto debated the story. A

report on the website Canadaland suggests that during this call Lang tried to “sabotage” or “kill” the entire story. There is no doubt the conference call was unusually intense. But we have already asserted that Lang had a responsibility to voice her concerns. And CBC News’s editorial checks and balances appear to have functioned properly; far from dying, the story rolled out in full with a high profile, and it had a significant public impact.

As for the Nixon interview, it should be understood that Amanda Lang is probably the only journalist we have who could have secured an interview with Gord Nixon that day. This was a significant ‘get’, and it is due in no small part to the knowledge Lang possesses, the contacts she has, and the sense from Nixon’s side that the interview would be fair.

What was noteworthy as we conducted this review is how narrow the knowledge was that this interview was taking place. Lang booked the interview on behalf of her own program, Lang & O’Leary. She discussed it with a producer on The National and they agreed that it would be used in some form on that program. And for a good chunk of the day, it didn’t appear to go any further than that.

Other than a cursory conversation with The National about the approach, there seems to have been no real dialogue over what the objective should be for this interview. Nobody thought to talk to Kathy Tomlinson about what sort of accountability might help push wherever the journalism was going next. Tomlinson says no one even told her that the interview was taking place.

Lang considers it appropriate that she did not collaborate with other journalists on how to conduct that interview. She feels she knows her subject, and she does the interview that works best for her and her program.

This may work for her program. Indeed, Lang and O’Leary was a program rooted in strong opinions, and it seems likely that an interview for that show might need to be very different than a newsgathering exercise. But it seems problematic that THE big accountability interview on a story that CBC broke could be done without any serious conversation among the multiple key players. If nothing else, we could have tried to ask Nixon a question outside the program interview that could have been used by Tomlinson/Parry, or others in the news service.

We won’t include the entire transcript of the interview. But you can watch it [here](#).

And the questions viewers heard are the following:

1. A lot of companies outsource, especially in IT, to another jurisdiction. India is a popular one. This is work you're outsourcing. Why are there workers here? What is the transition for?
2. Could the transition to overseas lead to foreign workers spending an extended period of time in Canada?
3. In terms of the visa program that iGate or any other sub-contractor would use, what do you think is the bank's responsibility to know that they are complying, that they are doing the right thing?
4. Why do you think this has struck such a nerve with Canadians?
5. This is one of the questions a lot of businesses have to ask, and Canadians are keenly interested in the answer: how do you balance the cost-savings of other jurisdictions - there's cheaper labour in other places - against investing and training in the Canadian workforce?
6. You've mentioned you've seen some of the online commentary, all of those customers who are threatening to close their bank accounts, move their loans. What's your message to them?

The tone and style of the interview is quite consistent with other interviews I have watched Amanda do (for the record, as part of this process I observed 27 different interviews covering various industries and topics that Amanda conducted over 2013 and 2014). She aims for 'explanatory, not accusatory.'

Fans of this style would say it elicited moments that might not have happened with a more confrontational approach. Nixon's admission that he's "embarrassed" and "feels like a hypocrite" because he's so involved with various job-creation initiatives in Canada is a good example.

Critics of this style would want Lang to have pushed Nixon harder on the bank's actions, and would be frustrated that Lang allowed Nixon to call CBC's journalism "unfair and misleading" without any response.

These judgments are all subjective. It is normal for CBC News to have different styles of interviewers who approach such moments with divergent strategies.

One observation in looking at events of that Monday is that earlier internal communication would have led to a better outcome on a number of fronts. Had the business unit been aware of the RBC story before the rollout, Lang's concerns could

have been addressed without the pressure of deadlines. And had Tomlinson been aware of the Nixon interview before it happened we might have found a way to satisfy more needs for the news service.

In the days following, things proceeded without incident. The story continued to generate response from the audience. And by Thursday, [RBC issued a public apology](#).

When Lang & O’Leary reported on the RBC apology, it generated conversation between the two hosts in which Lang opined that this was really a story about outsourcing. That comment did not create much buzz.

What changed next was Amanda Lang’s decision to write [an opinion piece for The Globe and Mail](#) on the Saturday.

The point of Lang’s essay was to explain why outsourcing was commonplace, and assert that the argument over whether it had merit was effectively passé.

She also made this statement about the week’s events:

The sideshow about hiring temporary foreign workers is just that – a sideshow. That program is not about outsourcing jobs but about importing labour or expertise not available in Canada.

This was interpreted by some - understandably, in our view - as an attack on the CBC’s own journalism. Lang maintains that was not her intention. She was simply stating that the fuss around foreign workers was a distinct matter, and should not mean a re-thinking of whether outsourcing was acceptable.

At least two other issues arose from this column. One was acknowledgement by CBC Management that Lang did not have permission to do it: “CBC News had no prior knowledge of Amanda Lang writing the editorial for the Globe and Mail in 2013,” said Jennifer McGuire on her Editor’s Blog.

Another was the revelation, first made in the article’s comments section, that Lang was soon scheduled to speak (for a fee) to a conference about outsourcing, sponsored by several companies including iGate.

As we know, the speech was cancelled. Both the speech and the Globe and Mail op-ed were the subject of a CBC Ombudsman review as well. Lang’s Globe piece was ruled to not live up to our Journalistic and Standards and Practices. Her conduct around the speech was upheld, though the Ombudsman may have foreshadowed [future controversy](#) around the subject of paid speeches.

Disclosure and Conflict of Interest

One key learning in this process has been that although CBC has fairly extensive rules around conflict of interest and in particular employees' obligations to disclose any potential conflict, it seems that our corporate guidelines are not clear enough on their own.

For employees of CBC News, an understanding of the rules begins with our Journalistic Standards and Practices. In the 2010 update of our JSP, Jennifer McGuire and Esther Enkin made sure to incorporate conflict of interest as a section within the JSP, indicating a heightened awareness of its importance.

The front page of this part of JSP begins as follows:

Our credibility is the foundation of our reputation. The credibility of our news, current affairs and public affairs programs rests on the reputation of its journalists who are, and are seen to be, independent and impartial.

The integrity of the organization is ultimately shaped by the individual integrity and conduct of everyone, in their work, and in their outside activities.

To preserve that independence, all employees involved in the creation of content that is subject to *Journalistic Standards and Practices* must carefully consider what organizations they are publicly associated with. They should be mindful that public statements, whether face-to-face or through social media, may create the impression of partisanship or of advocacy for a cause. If we believe there could be a conflict of interest, we inform our supervisor.

It goes on to add:

Conflict of Interest guidelines are spelled out in Corporate Policy 2.2.03 ([Conflict of Interest and Ethics](#)), 2.2.21 ([Code of Conduct](#)), and 2.2.17 ([Political Activity](#)). All people whose work is governed by our *Journalistic Standards and Practices* policies must read them and comply with their requirements. There may be other situations that create a potential conflict of interest. It is always wise to consult a supervisor if there is any doubt. The links to all Corporate policies that cover conflict of interest are provided in the section called "Links to Corporate Policies."

You can re-read those corporate policies by clicking on the links. But the simplest, most important clause is in 2.2.03 and re-states a point made in the JSP:

The duty to disclose and remove conflicts of interest rests with the employee.

That message seems very clear. Employees have a clear obligation to tell the CBC. And it's then the CBC's prerogative to determine whether a given scenario is problematic and requires mitigating action.

This is no academic matter. Amanda Lang was accused by Canadaland of being in a conflict of interest because of her relationship with a member of RBC's Board of Directors. That relationship was not known to her supervisors and colleagues at the time of the debate over the RBC stories back in April of 2013. "I can see now that I should have disclosed at the time of the RBC story. But in my mind, it was then a private matter," Lang wrote in a Globe and Mail Op-Ed from January 22nd of this year.

The 'private matter' assertion is interesting. Based on our review, people feel strongly about the duty to disclose. But there is not a shared understanding of what triggers that disclosure.

The absence of consensus revealed itself when we asked most interviewees a variation of the question, "at what point does a relationship begin to represent a potential conflict of interest?"

The answers ran the gamut from "marriage or living together" to when you're "monogamous" to "even a (single) date". Keep in mind, this does not address friendships, or family relationships which can be every bit as nuanced as romantic relationships.

CBC's corporate rules on conflict of interest are robust. They are also, out of necessity, articulated at a high level. There is no way they could deal with every specific possibility. But more work needs to be done internally around communication and interpretation of the rules.

There should be no grey area for journalists when it comes to expectations around disclosure in such cases. Whether a given situation requires recusal from a story, or perhaps a full public disclosure, the audience should have all the tools they need to assess the fairness, balance and integrity of CBC journalists. Therefore, the bias should be tilted toward tighter rules and more disclosure, in particular more formal, written disclosure protocols for both employees and supervisors.

Written protocols have been used successfully before within CBC News, in cases where a journalist had a relationship with somebody involved in partisan politics.

Coverage of the Banking Sector

Because there were allegations made that CBC News journalism was at risk from a perceived conflict of interest, we spent considerable time looking for evidence of any impact on our coverage of business and the banking sector in particular.

After screening dozens of “Lang & O’Leary” or “The Exchange” interviews from 2013 to today, and examining dozens of these program’s lineups, I did not detect any pattern suggesting RBC is being given a higher profile or being treated more favourably than any other bank. That analysis is anecdotal, of course. But we have also secured some broader research.

Cormex Research is a company CBC has trusted for other reviews, including analysis of our coverage during the last federal election. This research firm has tracked business coverage for years on behalf of many of the banks, who are interested in how CBC, CTV, BNN and over 150 other Canadian media outlets cover their industry. Cormex analyzed their data for all of 2013 and 2014. Not only is there no sign of favouritism toward RBC by Lang & O’Leary and/or The Exchange, these programs have given RBC slightly more negative coverage than they have given other banks.

We’ve attached the Cormex report as an appendix. But to quote its conclusion:

“Our data does not support an indication of untoward treatment of RBC on The Exchange relative to other banks and other outlets. The level of attention and the tone for RBC on the program was in keeping with observed norms among other comparable broadcast outlets covering the banks.”

The bottom line is that, optics and suspicions notwithstanding, there is currently no evidence to support the contention that CBC’s journalism has been compromised.

Recommendations

Based on these findings, we have recommendations about systems, process and management responsibility in the following areas:

Investigative News

Investigative reporting is critically important to our mission as a public broadcaster. This work is, understandably, done largely in private. But there are ways to benefit more from internal expertise. Many of CBC's investigative journalists have figured out how to tap in to their network of colleagues. But not everyone has embraced this practice. So, three recommendations:

1. Before going with an investigative story, there should be consultation with any relevant content unit. If it's about federal politics, that means the Parliamentary Bureau. If it's about medicine, that means the Health unit. If it's about business, that means the Business Unit. We are not talking about a veto, only a consultation. In this way, we will identify and deal with potential disagreement before publication, rather than after.
2. If a CBC News journalist questions the basic validity of an investigative story, it should trigger an immediate "Red Flag" process to be dealt with immediately and involve the correct level of journalistic leader. (The "Red Flag" is a system used in news in which potentially controversial stories are subject to automatic review by the Director of JSP, who also notifies the Editor-in-Chief).
3. When there is a major accountability interview building on original CBC journalism, there should be a wider conversation within CBC News about the objectives of the interview. The original reporter should be part of that conversation.

Conflict of Interest

1. The circumstances that prompted this review demonstrate why CBC journalists have a duty to disclose any potential conflict to their supervisors. All employees should be reminded of this duty.
2. News Senior Management, in consultation with People & Culture (Human Resources), should provide more specificity to the guidelines for disclosing conflict of interest by journalistic employees. The bias should be toward more disclosure, emphasizing potential and perceived conflict as well as real conflict. Ultimately, this protects both the journalist and the CBC. Management should ensure that all of our staff adhere to the most rigorous interpretation of this standard.
3. Throughout CBC News and Centres, as well as with other journalistic programs, establishing formal, written conflict of interest protocols around relationships should be routine rather than exceptional. Such protocols should be mutually understood by the employee and his/her manager.
4. Managers should understand that after negotiating such a protocol, they have two obligations: first, to share copies with the relevant Senior Managing Director and the Office of the General Manager and Editor-in-Chief; and second, to inform senior programmers so that they can make appropriate decisions.

Management

1. The News & Centres Management Team should do more to proactively communicate to all of their employees what the expectations are under our conflict and disclosure policies.
2. Management should commit to ensuring that all of their employees, inclusive of Senior Producers and Executive Producers, understand their obligations around flagging and resolving difficult issues or fundamental disagreements within their team. This means fostering a work environment that is conducive to openness and collaboration.



MEMORANDUM

TO: Jack Nagler, CBC News

FROM: Andrew Laing, President, Cormex Research

DATE: Tuesday, February 10, 2015

RE: **Evaluation: 24-hour news outlets and coverage of the major Canadian banks**

Introduction

In response to your request, the following examines media coverage of the major Canadian banks by CBC News Network's *The Lang and O'Leary Exchange* and *The Exchange with Amanda Lang* (*The Exchange*) against a benchmark of other coverage of the major banks by CBC News Network, CTV Newsnet and BNN-TV.

Methodology

The findings below come from the Cormex Financial Services Study. The Cormex Financial Services Study began in 1990, and is a syndicated media analysis study examining Canadian news media coverage of the Big Five banks and four biggest insurance companies in over 170 domestic print, radio, TV and digital news outlets. The study is arguably the biggest private sector media analysis study of its kind in North America, with a database of well over 1-million items, and has five subscribers within the industry.

The study examines all media coverage of the nine financial institutions for a number of variables, including tone, overall favourability, topic, sponsorship property, product/service, source, program mention, spokesperson, hot-button issue, placement/prominence, media initiative, and many others. Each item is human coded and entered into our database. Subscribers to the study receive regular monthly and quarterly reports as well as commission special ad hoc studies on specific topics. It is used by subscribers to evaluate the effectiveness of communications strategies, monitor issues and measure brand promotion initiatives between competitors.

For the CBC request, we took a subset of the data encompassing a 24-month period ending 31 December 2014, and restricted it to three outlets: CBC News Network, CTV Newsnet, and BNN, and the Big Five banks only. We then divided the data into two sets: *The Exchange*, and a

benchmark set containing all other coverage of the banks on the three networks.

The unit of analysis in this case is the **1-minute statement of each bank** – meaning that each distinct statement about a bank is counted as a single mention, by any host, reporter or interviewee on the program. Multiple mentions of a bank within each one-minute block was counted only once, but additional mentions in other and/or consecutive one-minute blocks were considered additional mentions. Cormex identified 24,403 statements within this data set: 487 on *The Exchange*, and 23,916 on all other programs.

Analysis and discussion of findings

The analysis focused on two hypothesis that have been raised by the recent controversy over Amanda Lang's role in CBC's reporting of the Temporary Foreign Workers story involving RBC Royal Bank.

H1 – *The Exchange* provided disproportionate attention to RBC compared to other banks.

H2 – *The Exchange* provided more favourable coverage of RBC compared to other banks.

In this study, our variable measuring “favourability” determines whether the statement is favourable, unfavourable, or neutral/balanced for a bank using the following criteria:

It is favourable if:

- a) It is coverage generated by the bank
- b) It mentions a corporate initiative or branded program
- c) It cites one of a series of favourable corporate reputation messages, such as “promotes innovation” or “strong financial performer”
- d) Portrays the bank in a positive context

It is unfavourable if:

- a) It cites one of a series of hot-button issues, including the TFW program, as well as service fees, customer service complaints, etc.
- b) It involves declining share price
- c) It involves rising lending rates
- d) It involves fraud
- e) It cites the corollary of a series of corporate reputation messages, such as “weak financial performer,” or “does not support community”
- f) It portrays the bank in a negative context

All other items are categorized as neutral/balanced, or if there is a balance between favourable and unfavourable indicators in the statement.

Based on this interpretation, we observed the following.

No significant difference in overall level of attention. The first hypothesis would be rejected – there was no significant difference in the level of attention devoted to RBC relative to other banks on *The Exchange* when compared against the benchmark. Among the Big Five banks, RBC had the highest share of coverage on *The Exchange* at 27.9%, followed by CIBC at 21.4%. However, that reflected only a two percentage point gap (8% difference) with the benchmark at 25.9%, and

the gap actually narrowed between 2013 (2.7 percentage points) and 2014 (0.9 percentage points). The higher profile for RBC overall was not surprising, as traditionally, RBC has led volume of coverage in the Cormex Financial Services study among the 170+ outlets tracked, mostly due to its size in the Canadian market. Moreover, removing unfavourable coverage, the gap dropped to almost zero – 0.1 percentage points (0.4% difference).

Figure 1

Bank share of volume, by year: *The Exchange* versus benchmark

year				bank					Total
				CIBC	BMO	RBC	BNS	TDBFG	
2013	Program	Other	Count	2077	3580	3581	2168	2975	14381
			% Share	14.4%	24.9%	24.9%	15.1%	20.7%	100.0%
	The Exchange	Count	56	47	77	55	44	279	
			% Share	20.1%	16.8%	27.6%	19.7%	15.8%	100.0%
	Total	Count	2133	3627	3658	2223	3019	14660	
			% Share	14.5%	24.7%	25.0%	15.2%	20.6%	100.0%
2014	Program	Other	Count	1866	1283	2603	1801	1982	9535
			% Share	19.6%	13.5%	27.3%	18.9%	20.8%	100.0%
	The Exchange	Count	48	29	59	34	38	208	
			% Share	23.1%	13.9%	28.4%	16.3%	18.3%	100.0%
	Total	Count	1914	1312	2662	1835	2020	9743	
			% Share	19.6%	13.5%	27.3%	18.8%	20.7%	100.0%
Total	Program	Other	Count	3943	4863	6184	3969	4957	23916
			% Share	16.5%	20.3%	25.9%	16.6%	20.7%	100.0%
	The Exchange	Count	104	76	136	89	82	487	
			% Share	21.4%	15.6%	27.9%	18.3%	16.8%	100.0%
	Total	Count	4047	4939	6320	4058	5039	24403	
			% Share	16.6%	20.2%	25.9%	16.6%	20.6%	100.0%

No significant difference in tone. The data also does not support the second hypothesis. There was only a 0.4 percentage point difference in favourable coverage of RBC by *The Exchange* compared to the benchmark, although once again RBC saw the highest volume and share of favourable statements on both *The Exchange* and in other outlets surveyed. However, there was a relatively small gap on this measure between RBC and CIBC on *The Exchange*, and a wider gap between the two banks within the benchmark data set.

Figure 2

Bank share of volume, by year and favourability: *The Exchange* versus benchmark

Favourability				bank					Total	
				CIBC	BMO	RBC	BNS	TDBFG		
Favourable	Program	Other	Count	2348	2786	3394	2228	2800	13556	
			% Share	17.3%	20.6%	25.0%	16.4%	20.7%	100.0%	
	The Exchange		Count	71	53	79	55	63	321	
			% Share	22.1%	16.5%	24.6%	17.1%	19.6%	100.0%	
	Total			Count	2419	2839	3473	2283	2863	13877
				% Share	17.4%	20.5%	25.0%	16.5%	20.6%	100.0%
Neutral	Program	Other	Count	1342	1842	2117	1423	1926	8650	
			% Share	15.5%	21.3%	24.5%	16.5%	22.3%	100.0%	
	The Exchange		Count	24	17	30	26	19	116	
			% Share	20.7%	14.7%	25.9%	22.4%	16.4%	100.0%	
	Total			Count	1366	1859	2147	1449	1945	8766
				% Share	15.6%	21.2%	24.5%	16.5%	22.2%	100.0%
Unfavourable	Program	Other	Count	253	235	673	318	231	1710	
			% Share	14.8%	13.7%	39.4%	18.6%	13.5%	100.0%	
	The Exchange		Count	9	6	27	8	0	50	
			% Share	18.0%	12.0%	54.0%	16.0%	0.0%	100.0%	
	Total			Count	262	241	700	326	231	1760
				% Share	14.9%	13.7%	39.8%	18.5%	13.1%	100.0%
Total	Program	Other	Count	3943	4863	6184	3969	4957	23916	
			% Share	16.5%	20.3%	25.9%	16.6%	20.7%	100.0%	
	The Exchange		Count	104	76	136	89	82	487	
			% Share	21.4%	15.6%	27.9%	18.3%	16.8%	100.0%	
	Total			Count	4047	4939	6320	4058	5039	24403
				% Share	16.6%	20.2%	25.9%	16.6%	20.6%	100.0%

The data actually pointed to *more* negative coverage for RBC on *The Exchange* compared to the benchmark, as our database attributed more negative statements about RBC on *The Exchange* than all other banks combined. Negative statements concerned a range of topics, from hot-button issues such as CEO compensation, the Earl Jones fraud case, and the TFW issue, along with other stories and negative statements. Viewed another way, unfavourable statements about the

banks on *The Exchange* comprised 10% of total volume, above 7% for the benchmark outlets, and accounted for 20% of RBC's coverage on *The Exchange*, compared to 11% on the benchmark outlets. However, readers should be cautioned in placing too much emphasis on the differences in the unfavourable volume, as the sample size at only 50 statements is very small.

Conclusion

Our data does not support an indication of untoward treatment of RBC on *The Exchange* relative to other banks and other outlets. The level of attention and the tone for RBC on the program was in keeping with observed norms among other comparable broadcast outlets covering the banks.