

Policy brief

Use of plain English in
written communications



NALA

National Adult Literacy Agency
Áisíneacht Náisiúnta Litearthachta do Aosaigh

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The National Adult Literacy Agency (NALA) was established in 1980 and is an independent membership organisation, concerned with developing policy, advocacy, research and offering advisory services in adult literacy work in Ireland. NALA has campaigned for the recognition of, and response to, the adult literacy issue in Ireland.

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Contents

Position statement..... 4

Summary analysis 4

 Issue statement..... 4

 Policy implications 5

 Existing policy efforts 6

Policy options 8

 Examples of broad governmental approaches 8

 Examples of approaches from other actors..... 9

Policy recommendations 10

References 12

Introduction

This policy brief argues for the use of plain English in written and verbal communications. While NALA recommends that all organisations – public, private and non-profit – adopt plain English, this brief is primarily aimed at Government both as an information provider and as a funder of other information providers. For the purposes of this policy brief, we are focusing on information that is available to the public, although plain English is just as beneficial when used within organisations.

Position statement

NALA recommends that all public sector bodies, including the Government, devise and implement policies to incorporate the use of plain English into their communications as standard practice.

Summary analysis

Issue statement

Plain English is a style of giving information that enables someone to get the facts they need, understand them easily and act on them if they need to. It involves not only writing more clearly, for example through simpler phrases, more direct language or shorter sentences, but also structuring and laying out information in a way that makes it easier to follow. The term usually applies to written information, but plain language in speech is just as important, particularly when there can be more constraints on checking understanding.

Some suspect plain English of dumbing down complex rules and schemes, but experts have shown these suspicions to be unfounded¹. Instead, plain English has a number of advantages.

- It helps organisations save time and money and increase effectiveness².
- It can encourage individuals to engage with public services and make informed decisions when doing so.
- It increases the likelihood that people will comply with official rules and use services efficiently.
- It helps inspire confidence in service providers.

¹ For example, Kimble (1995), Butt (2002), Cutts (2004)

² Grotsky (2004)

A number of international examples illustrate this:

- When the unclaimed property section of Arizona's Department of Revenue rewrote its letters in plain English, it received about 11,000 fewer phone calls than it had in the previous year. The division had more time to do other work and could process about 30,000 more claims. Apart from helping to increase efficiency, the use of plain English helped improve staff morale, as employees no longer needed to answer the same questions repeatedly.³
- Before the UK's Royal Mail redesigned its 'redirection of mail' form, 87% of customers made mistakes when filling it in. The company had been spending over £10,000 a week to deal with complaints and reprocess the incorrect forms. Following the redesign, the error rate fell dramatically, allowing Royal Mail to save £500,000 over the following nine months⁴.

Policy implications

Although there are international examples of plain English use among public service providers, a lot of the written information currently produced by the Irish public service is perceived to be formal, wordy and awash with unnecessary or unexplained jargon. The style used to present the information plays a major part in the extent to which people understand their obligations and entitlements and, as a result, access and deal effectively with public service providers. Arguably, it also contributes to a sense of distance between public bodies and the people they are set up to serve.

This is a problem for the public service and the population as a whole, but it has particular consequences for adults with literacy difficulties. According to the OECD (1997), over 50% of Irish adults have less than the desirable level of skills needed to function effectively in a modern society – in other words to access, understand and use information on civil, public and social services to enable them to take part in community, social and economic life.

³ Plain Language Action and Information Network (2008)

⁴ Word Centre (2005)

Lack of clear information can, for example, prevent people from:

- applying for social welfare benefits,
- appealing official decisions,
- making freedom of information requests,
- replying to official letters,
- following instructions, or
- claiming tax relief.

The main implications of inadequate public information are that resources are being used inefficiently, with the risk that staff time is devoted to answering questions about unclear communication or dealing with complaints rather than meeting other information needs. Instead, the Government, both as information provider and funder, should seek to:

- understand and reach the various groups to which information is directed, and
- adopt, and require others to adopt, a planned and pro-active approach to all forms of written communication for the public, not simply 'key' documents or those with a vast readership.

Existing policy efforts

In Ireland, elements of the public service have already shown an awareness of the importance of using plain English. Both the Government's consultation paper *Towards Better Regulation* (1999) and the Law Reform Commission's report on legal drafting and interpretation, *Plain Language and the Law* (2000), identify clarity as an essential element of high quality laws and regulations. The Law Reform Commission recommended, among other things, familiar vocabulary, shorter and simpler sentences and more examples to clarify the effects of our laws. However, it's unclear how or whether legal drafters have taken these recommendations on board.

But aside from such reports, practical initiatives from Government departments and statutory bodies to put their information into plain English have generally been small-scale. The following are some examples of the public communications that NALA has put into plain English:

- a customer action plan from one local authority,
- a housing manual and a set of seven application forms from another local authority,
- health promotion information leaflets and booklets from a range of hospitals,

- equality brochures, a diversity strategy, a customer action plan, a passengers' charter and fare-related leaflets from semi-state transport companies,
- application forms, information booklets and some customer letters from a Government department,
- consumer information leaflets from a regulatory body, and
- guidelines on ethical research, leaflets on people's right of complaint and manuals and guidebooks from various other statutory bodies.

The organisations whose documents we have worked on include the Department of Social and Family Affairs, Health Promotion Information Project in the HSE, Office for the Director of Corporate Enforcement, Office of the Ombudsman and Information Commissioner, Road Safety Authority, Communications Regulator and Dublin Bus.

At first glance, the examples of materials and organisations might augur well for the public sector's efforts to be more accessible to the public, but the inclusion of specific materials highlights the fact that such efforts can be isolated and sporadic. Often one department – or a sub-section of a department – within an organisation opts to use plain English for a small sample of its documents. This often is a practical approach initially, as the availability of time and other resources may require organisations to prioritise some documents over others. But the gap between service provider and service user is perpetuated as long as only a number of information leaflets, letters or booklets are clear for the average reader.

Policy options

The options open to Government are to encourage, and indeed require, a national approach to clear communications or to let individual organisations take the lead according to their own priorities. Examples of both approaches exist in a range of English- and non-English speaking countries⁵.

Examples of broad governmental approaches

- The Swedish government first appointed an expert to begin modernising the language in its laws in 1976. It set up the Plain Swedish Group in 1993 to encourage state agencies all over Sweden to start plain language projects. This was followed in 2005 by a parliamentary bill 'Best language – a concerted language policy for Sweden', which proposed four new objectives for national language policy, including that the Swedish authorities use simple and understandable language. While no large-scale studies have taken place on the benefits of using plain language, government initiatives have expanded to the point that over 1,000 government documents – including 875 Acts – were revised by lawyers and linguists in 2006.
- In Mexico, the government's Citizens' Language project aims to make government regulations more understandable to citizens. The project features in the 'Better Regulated Government' strategy of Mexico's Good Government Agenda and is designed to make it easier for citizens and public servants to complete their business easily, securely and quickly. The project awards clear writing, offers a one year academic programme especially for civil service staff and has so far trained over 5,000 other staff through short plain language workshops.
- In the United States, a number of federal agencies such as the Federal Aviation Administration, Health and Human Services and the Food and Drug Administration have embarked on plain English initiatives for regulatory documents, notices and legal instructions. Various US presidents such as Nixon, Carter and, most recently, Clinton (in his 1998 Presidential memorandum on plain language in government writing) have issued orders requiring the use of plain English in regulations and other public documents. The

⁵ The term 'plain language' is used for non-English speaking countries.

latest governmental effort is the proposed Plain Writing Act 2009, which is designed to “improve the effectiveness and accountability of Federal agencies to the public by promoting clear Government communication that the public can understand and use”⁶. At time of writing (October 2009), the Act is progressing through the US Senate’s committee stages. If it is passed, each federal agency will need to start producing most printed or electronic documents (except regulations) in plain language within a year of the Act coming into force and will need to submit periodic progress reports to the US Congress. A similar bill, the Plain Language Act 2009, is at committee stage in the US House of Representatives.

- The Communications Policy of the Government of Canada, published in 2006, includes a specific reference to plain language: “To ensure clarity and consistency of information, plain language and proper grammar must be used in all communication with the public.” The policy is aimed at government institutions throughout Canada and, although not enshrined in law, it is underpinned by a range of procedures and regular monitoring by Canada’s Treasury Board. The policy builds on initiatives within provincial and federal government departments such as the Canada Customs and Revenue Agency (CCRA), the National Literacy Secretariat and Securities Commissions in British Columbia and Ontario, among others. Legislation has been drafted either using plain English (such as the Employment Insurance Act) and/or to require the use of plain English (such as Alberta’s Financial Services Act). Professional bodies and provincial organisations such as the Canadian Bankers Association and the Canadian Public Health Association also help to promote the use of plain language in their own sectors.

Examples of approaches from other actors

The alternative to concerted, broad-based government action is the gradual, scattered approach that has occurred in countries such as Australia and the United Kingdom. These approaches usually entail limited government activities and involvement by professional bodies and private companies to fill the vacuum.

⁶ S. 574: Plain Writing Act of 2009 (section 2). Available online at <http://www.govtrack.us/congress/billtext.xpd?bill=s111-574>

- In Australia, the United Nations' International Literacy Year in 1990 sparked interest in the quality of public writing and led to the publication of a guide to clear documents. Laws on income tax and road safety have been put into plain English, but they are isolated occurrences. Although some plain language policies exist at government level, there have been few formal programmes to support them. The majority of plain English initiatives in Australia appear to stem from the legal profession, particularly law firms.
- In the UK, the plain English movement first began in the late 1970s. Since then it has been largely characterised by occasional government efforts to improve legislation and by campaigning efforts from private companies such as the Plain English Campaign. Some government offices, such as the Office of Fair Trading, have encouraged the spread of plain language by requiring it in certain consumer documents. The other main actors in plain English include local authorities, health services and large financial corporations.

NALA favours the broad governmental approach because:

- it is more likely to engage and solicit support from diverse stakeholders and significant policy and decision makers,
- it enables plain English to be promoted from a range of angles, be it democracy and transparency, social justice or cost effectiveness, and
- it has the capacity to bring about long-term and far-reaching changes in how public information is presented.

Policy recommendations

It is worth highlighting that plain English is not a one-size-fits-all approach or intended as a cure all – public service initiatives succeed or fail for a number of reasons. Indeed, time and resource constraints can militate against using plain English for all documents, but public services can still adopt a more co-ordinated approach in this area than at present to truly reach the people they have been set up to serve.

NALA recommends the following policy approach to embed plain English across the public sector, especially central government.

1. All public bodies should draft an organisation-wide plain English policy.
2. All public bodies should engage whatever resources are available and necessary to make sure their public information is as clear as possible. Ensuring clarity includes, but is not limited to, testing leaflets, letters, forms and other public information for their usability among those most likely to read them.
3. All Government departments should require agencies and other bodies under their remit to provide evidence of a plain English policy and action plan in their applications for project funding or annual budget submissions.
4. The Department of An Taoiseach should use its role as co-ordinator of the Quality Customer Service Initiative to set up a code of practice for using plain English in all public communications.
5. The Department of An Taoiseach should set a target for putting public information into plain English and make this a key performance indicator of the Government's record of being accessible to the public.

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