



Setting the standard: some steps toward a plain language profession.

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1. How do you know?

Not long ago, I was approached by a legal organisation to prepare a plain language program. Or I should say, I was approached by one of its senior staff, who felt their writing could do with a makeover. But when our proposal went to the full Executive, the story rapidly changed. They felt that they were already using plain English as far as possible, and there was no need for further effort. To that, I had one question:

How do you know?

Well, they said, we made plain English mandatory in our writing manual, so we must be doing it. Yes, but how do you *know*? Do you have any way of measuring your writing as plain language? To that, I only received blank looks at four paces.

Now to give you some idea of the writing that we were dealing with, here's a sample from a standard contract drafted and used by that organisation:

The Consultant will ensure that the Specified Personnel undertake work in respect of the Services in accordance with the terms of this Agreement and will not be hindered or prevented in any way in the performance of their duties in carrying out the Services including but not limited to being removed from the performance of the Services or being requested to perform services which in any way interfere with the due performance of the Services by the Specified Personnel.

In case you are wondering, this actually means:

The consultant will ensure that the specified personnel deliver the Services without any hindrance.

Anyone reading the two versions is in little doubt which one is the clearer and more readable. The astonishing thing is that senior members of that organisation believed that the first version was as plain English as it was possible for them to go.

When I tried to persuade them otherwise, they quickly asked for the standards that supported my case. I had to admit that, while there is plenty of case-specific evidence, there was as yet no set of international standards backed by an institutional authority. There is no ISO reference point for plain language; no professional body setting industry benchmarks; no accreditation system for practitioners.

Unlike doctors or lawyers or architects or computer programmers, unlike scientists or engineers or accountants, we are not yet a profession. And I would argue that until we establish some kind of professional standards and structure, we will continue to come up against these barriers in our professional credibility.

2. Standards and measures

But let me define what I mean by a standard of plain English. Broadly speaking, I believe there are three things we can measure when working as language professionals:

- the writing itself
- perceptions about the writing
- actual outcomes of the writing.

The writing

Of course, the writing is the most obvious thing. You take a stack of sample documents and analyse the content, the structure, the layout and the expression:

- Is their core content clear?
- What structures do they employ?
- How effective is the layout and design?
- What level of diction do they use?
- Are they mainly in the active or passive voice?
- Is there a lot of redundancy?
- How long are the sentences?
- Are there any grammatical errors?

These are the easiest things to start measuring, and they will tell you a lot about the effectiveness of your writing. This is the traditional territory of plain English.

The problem with measuring the writing alone, however, is that it is in danger of neglecting the context—the real world environment the writing is operating in. You can get all of the elements of language right, but still see the document fail. So further measures are needed.

Reader perceptions

So the next type of measure is your audience's perceptions. You survey your readers and you ask them what they think about your writing.

- Do you find these documents easy to read?
- What impression do our documents give you about our organisation?
- Does this document make you more likely to buy our product?
- What is the most important information you need from this text?
- Are you persuaded by the recommendations?
- How easy are these forms to use?

Answers to these questions will reinforce your analysis of the writing. But we need to be a trifle cautious with reader perceptions, because they are not always accurate. For example, if you ask readers which font they prefer, they will generally pick one that looks attractive. But this is not always the font that is quickest to read. The ultimate test of success is to sit them down and have them read comparable text in different fonts and actually measure which one is the more effective.

The outcomes

Here we are entering the realm of usability testing, the third kind of measure of effective writing. Take your real world document and actually put it in front of sample readers doing real tasks and see how it works. Measure the outcomes for the writer or for the organisation, such as:

- time—how long does it takes to read and respond to a document
- compliance—the error rates in processing documents
- satisfaction—rejection rates or complaints
- costs—savings in costs such as paper and staff time
- profits—changes in net revenue.

These are often the most compelling and powerful measures because they take account of both text and context. They are even more useful if you can begin testing at the very start of the process to inform your drafting. The disadvantage of outcome measures is that they can be time consuming, a little costly and sometimes downright impractical.

Putting it together

So effective standards need take account of more than just the average length of sentences. If we put them together, we can come up with some six areas for standards:

Audience

Content and purpose

Structure

Language and style

Design

Outcomes

3. Existing standards

Now there's nothing exactly new in these elements, as plain language practitioners have been out there working with them for several decades. But what we've been doing individually has varied from country to country and practitioner to practitioner. Let's have a look at some of the attempts at setting standards in different parts of the world. I've taken a small selection from the UK, USA, Canada, South Africa and Australia. These are by no means the only examples, but they will be enough for our purposes today.

Plain Language Commission

It is fitting perhaps that we start with one of our pioneers, Martin Cutts, who is here today. Martin's organisation, the Plain Language Commission in the UK, lists on its website the factors that it considers when evaluating a document. The WriteGroup in New Zealand uses a similar approach as its set of standards:

Purpose

Is the purpose obvious or stated early and clearly?

Content

Is the information accurate, relevant and complete, anticipating readers' questions and answering them?

Are essential technical terms explained or defined?

Is a contact point stated for readers who want to know more?

Structure

Is the information well organized and easy to navigate through, with appropriate headings and sub-headings?

Is there appropriate use of illustrations, diagrams and summary panels?

Style and grammar

Is the style appropriate for the audience, with a good average sentence length (say 15-20 words), plenty of active-voice verbs, and reasonably short paragraphs?

Is the document free of pomposity, verbosity and officialese (no aforesaid, notwithstanding, hereby, adumbrates, commencements and inter alias)?

Is the text grammatically sound and well punctuated?

Is capitalisation consistent in text and headings?

If there is a contents page, are its headings consistent with those in the text?

Layout and design

Does the document look good?

Is the type easily readable and is there enough space between lines of type?

Is there a clear hierarchy of headings and spaces?

Have emphasis devices, such as bold type, been used well?

Wordsmith Associates

Of course, the other international standard setter here today is Christine Mowat of Canada, whose CLARITY model structures plain language elements in a creative way:

C Conciseness

1. Keep words and sentences brief when possible.
2. Segment long sentences reflecting complex relationships between ideas.
3. Prune out deadwood language; reduce phrases to one word.
4. Head documents of four or more pages with summaries.
5. Provide succinct numbered action statements and recommendations.

L Lean and lively language

1. Create maps for your readers with subject headings and tables of contents.
2. Purge your language or legalese.
3. Use language which is familiar yet used in a fresh and interesting manner.

A Active voice

1. Use active voice verbs for directness, whenever possible.

R Regular and reasonable

1. Review your document for any non-standard usages.
2. Consistently refer to a comprehensive and up-to-date dictionary.
3. When in doubt, check style and grammar usages in a modern usage manual.
4. Ensure your document is written in complete punctuated sentences.
5. Develop the habit of peer editing with a colleague whose judgement you trust.

I Image evoking, concrete and specific

1. Replace abstractions with specifics.
2. Create reader-friendly pages with clear heading systems, visual aids, short paragraphs, lists and pleasing type style and layout.
3. When appropriate, choose language that mirrors images.
4. Use verbs not their noun forms.

T Tight organisation

1. Check for subject focus, logical links and a link to the next action.
2. Decide whether an indirect or direct pattern of presentation is best.
3. Use parallelism whenever describing comparable items.
4. Organise material for selective reading.

Y You and your audience

1. Tailor the message to the audience
2. Review appropriateness of tone and language. Read with the reader's eyes.
3. Edit and proofread scrupulously

Plain English Foundation

In Australia, the Plain English Foundation applies its verbumetrics system when evaluating an organisation's writing. This breaks down into similar categories, but focuses on more quantitative rather than qualitative measures, with a mix of writing, perception and outcome measures. Here are the most common dozen that we use:

Element	Measure	Scope
Audience and purpose		
Audience needs	Reader profile	Mapping of benchmarks suitable for the audience of a document
Reader perceptions	Perception surveys	Audience views on existing writing
Content and structure		
Focus	% key material	Ratio of key content: detail
Structure	Structure mapping	Evaluation of structural design, complexity, balance, headings, numbering and navigation.
Persuasiveness	Value analysis	Ratio of description: analysis
Logic	Proof analysis	Evaluation of key argument types in an analytical document
Design		
Document design	Layout index	Weighted index of elements such as type, spacing, justification, visual aids, bullets and lists etc.
Language		
Tone	Tone scale	Language level and appropriateness for a particular audience
Readability	Fry graph	Likely comprehension of text with intended audiences
Clarity	Active voice	Balance of different verb types and likely impact on audience
Efficiency	Key words	Ratio of core meaning words to functional words
Outcomes		
Usability	Testing	Measurement of actual outcomes

Interestingly, what all three systems have in common is that they are provided by the private sector. All are plain English consultancies offering their services and expertise for payment. It is hardly surprising then that there has not yet been a combined set of standards. That would perhaps call for the involvement of the public sector.

South Africa – National Credit Act

Yet when legislators have been involved in standards setting, they tend fall back on fairly general guidelines. In South Africa, for example, there were recent attempts to codify plain English in the new *National Credit Act*:

64. (1) The producer of a document that is required to be delivered to a consumer in terms of this Act must provide that document-

(a) in the prescribed form, if any, for that document; or

(b) in plain language, if no form has been prescribed for that document.

(2) For the purposes of this Act, a document is in plain language if it is reasonable to conclude that an ordinary consumer of the class of persons for whom the document is intended, with average literacy skills and minimal credit experience, could be expected to understand the content, significance, and import of the document without undue effort, having regard to-

(a) the context, comprehensiveness and consistency of the document;

(b) the organisation, form and style of the document;

(c) the vocabulary, usage and sentence structure of the text; and

(d) the use of any illustrations examples, headings, or other aids to reading and understanding.

While a commendable exercise, the on-the-ground experience has been that most of the first documents under the new laws use the very same, very un-plain language of old.

USA – H. R. 4809

The Americans have also had a go at legislating for plain language, with several governments having passed laws requiring agencies to write in plain English. One of the most recent examples was an attempted amendment to the *Paperwork Reduction Act*, to ‘facilitate compliance with Federal paperwork requirements’. In the end, this Bill did not get up, but it is interesting what elements it identified:

(15) the term ‘plain language’ means language that is clear and readily understandable to the intended reader and complies with the following standards:

- (A) Uses short words, sentences, and paragraphs.
- (B) Uses active verbs.
- (C) Contains explanations of legal, foreign, and technical terms, unless the terms are commonly understood.
- (D) Avoids defining terms that are commonly understood.
- (E) Uses personal pronouns to refer to affected persons and the responsible agency if helpful to improve clarity.
- (F) Minimizes cross-references.
- (G) Avoids sentences with double negatives or exceptions to exceptions.
- (H) Uses tables, diagrams, pictures, maps, and vertical lists to improve clarity.
- (I) Demonstrates logical organization.
- (J) Addresses separate audiences separately.
- (K) Places general material before exceptions and specialized information.
- (L) Addresses processes covered by a rule in chronological order.
- (M) Follows other best practices of plain language writing.

We have in these examples a fair degree of consensus about what plain language standards might include, and if we return to our checklist, most areas are well covered:

- Audience
- Content and purpose
- Structure
- Language and style
- Design
- Outcomes

So my first conclusion is a positive one: there is a wealth of practical experience we can already draw from to put together some professional standards. Far from starting from scratch, we are starting with a considerable foundation underneath us.

That’s not to say that the task will be easy. Here is my top ten list of the main issues we will need to resolve to bring our standards together.

4. The top ten issues

1. Consolidating the research base

The first step is to draw together all of the work that we've been doing individually, whether that is in the existing attempts at standards or the research base that supports them. There's little point in reinventing the wheel.

2. Scoping the languages to include

Next, there is the question of how multilingual our standards should be. Our very presence here shows that there is not just a plain English profession in the making, but plain Dutch, plain Swedish, and plain Portuguese ones as well. Do we take on all of these at once, or do we focus initially on English?

3. Positioning plain language with other fields

Thirdly, we need to clarify where and how we sit in proximity to other fields. How do we relate to disciplines like technical writing, information design, cognitive psychology, grammar or rhetoric? Are we the multidisciplinary profession that brings all of these things together? If so, do we define our profession by the tasks we apply our work to, such as the language of public exchange?

4. Testing versus techniques

The next question is what our standards will emphasise. There is at times a dichotomy set up whenever talk turns to plain language: testing versus techniques. One end advocates a testing-driven standards regime as the best way you can guarantee that your document will work. The other end focuses on text-based techniques such as readability measurement, the level of active voice or principles for effective structure.

In reality, I don't believe we need to make an exclusive choice between these two approaches. Indeed, I don't see them as alternative approaches at all, but part of a single continuum of plain language standards. But this is a debate we need to have.

5. Untangling intellectual property

Perhaps a more significant challenge to overcome will be the commercial nature of much of the work done to date. We cannot shirk the fact that many of those who have invested in plain language systems make a living out of this investment. So there will be some difficult tangles of intellectual property to work through.

6. Distributing the standards

Once that is done, there is then the question of what model we use to distribute the standards. Do we make them available for free as a matter of public interest, and if so, how do we maintain quality control? If not for free, do we sell them, and using what model?

7. Setting the institutional structure

Once we have agreed on a common set of standards and a model for distribution, the next practical hurdle will be the institutional structure to administer them. Do we set up a professional association, and can it be international rather than nationally-based? What relationship would it have with existing bodies such as PLAIN and Clarity?

8. Regulating the profession

If we are to take professional associations as our model, that also calls for some kind of benchmarks for memberships, perhaps with formal accreditation for plain language professionals. This is perhaps one of the trickiest challenges, as other fields have already found. In Australia, our editors' societies have been tearing themselves apart wrestling with this issue.

9. Establishing a role in research and training

Then there is the potential ongoing role of our institution in extending the research base and supporting its members, such as through seminars, publications and conferences. This calls for a close relationship with the tertiary sector, but what academic discipline does such a multi-disciplinary area such as plain language deal with?

10. Financing

Lastly, who is going to be paying for all of this activity? The obvious answer is its professional membership, but is our profession large enough and wealthy enough to sustain it? I suggest that setting standards would certainly raise the financial capacity of our practitioners, but do they have the capacity to get it going in the first place?

5. Next steps

If that all sounds like an exhausting workload to take on, it is only so because the potential for our profession is so high. Clearly, however, we are not going to be able to do this all at once. My feeling is that we should separate the tasks into two areas:

- those that are more readily achievable
- those that need work over the longer term.

In the more readily achievable category, I would put the following:

- An umbrella organisation with a draft constitution and operating model.
- A process for consolidating a single set of standards.
- An initial focus on English.
- A volunteer-based effort with minimal member funding.
- An initial priority on consolidating the research base.

I want to suggest a series of specific steps we can take over the next two years:

1. Agreeing to tackle the task.

This process can start now. Today. It starts with the consensus that it is worth taking on. It also starts in the knowledge that we don't have all the answers and don't know what the final destination will be. At the end of this session, perhaps we can call for a vote to test whether we have that consensus.

2. Forming an international working group

If we agree to give it a go, what process do we use to begin? I'm suggesting we form an international working group of twelve practitioners:

Two members each from PLAIN, Clarity and the Center for Plain Language.

Six representatives from other countries to ensure a broad international spread.

3. Preparing an options paper on five areas

The main task of the group would be to set out the available options in five areas:

- institutional structure
- services and activities for our institution
- setting plain language standards
- potential research activities
- funding.

4. Debating the options paper at Clarity 2008

To give this a deadline, I suggest that the working group publish its report in time for the Clarity conference in 2008. Clarity sessions can then be set up to debate specific options.

5. Developing preferred model

Based on the feedback, the working group would then prepare over the following year a 'preferred model' for setting up the process.

6. Launch the preferred model at 2009 PLAIN conference

The 2009 PLAIN conference would then see further debate and the formal adoption of a final working model.

What would come further along?

Once this process is complete, our umbrella institution would then be able to pursue:

- the completion and launch of draft standards
- a formal funding base for extended activities
- individual membership and accreditation
- a program of new research
- training and professional development programs.

In short, if the process succeeds, we could evolve into the full 'Institute' that Christine Mowat argued for in her opening paper. At a minimum, we would have a formal structure for developing the first plain language standards, along with some productive debate over the next two years. All for the cost of 12 people donating their time.

No doubt this approach will sound too cautious to some and far too optimistic to others. But let us begin the debate. I look forward to hearing the representatives of Clarity and the Center for Plain Language, and to the discussion throughout the rest of the conference.

Dr Neil James is Executive Director of the Plain English Foundation in Australia, which combines plain English training, editing and auditing with a public campaign for more ethical language practice. Neil has published three books and over 50 articles and essays on language and literature. His latest book, Writing at work, (Allen and Unwin, 2007) is on the language of the professions.