



This policy paper explains why clear language is needed for administrative purposes, for legal purposes and for administrative names. It also describes how these objectives have been promoted in Finland. Drawn up in the Institute for the Languages of Finland. Inquiries: virakieli@kotus.fi

Clear language is inclusive and prevents exclusion

FINLAND'S EXPERIENCE SHOWS CLEAR LANGUAGE YIELDS GOOD RESULTS

Finland has a long-held view that good governance requires clear language. Already in the 1970s many government agencies and courts of law decided to make their texts clearer, because they believed that without clarity inclusivity and protection under the law could not be met. In 1979 the Government commissioned a committee to identify ways to clarify legislation and court decisions and decisions made by government agencies.

Legislation and experts to support clear language

By recommendation of the committee, the first statute on the quality of administrative language was passed in 1982. It applied to state authorities. The same qualitative requirement was later applied to all public authorities in 2004, when a requirement for clear language was introduced in the Administrative Procedure Act, although without any sanctions for non-compliance.

The government has recruited experts in clear language to its agencies and to the Institute for the Languages of Finland since the 1980s. Although translators and communications specialists often advocate clear language in administration, more clear language experts are needed. All public authorities, particularly senior officials, are responsible for promoting and using clear language, however. It is difficult for individual public officials to produce good, clear texts if their whole organisation – or indeed

the whole of public administration – has no shared view of how to promote clear language.

Clear language requirements change over time

Technological advances have changed the way we write and keep in touch with stakeholders and clients. This means that language use must also change. The Finnish Government commissioned an action plan in 2014 for improving legal language and communications as well as services provided by public authorities. The action plan stresses that documents are a key tool for public authorities and it gives recommendations on how work can be organised so that the authors of texts receive the support they need. The recommendations are summarised in a poster for the use of all public authorities ([How to write good texts in the workplace](#) and [How you can improve administrative texts](#)).

A clear language campaign in public administration was jointly conducted by the ministries, government agencies and the Institute for the Languages of Finland between 2014 and 2015. Since then, many public authorities have taken the recommendations of the action plan into use. Finland is also the only country to have included action for clear language in its Open Government Partnership project. While in Finland we have understood that clear language pays off, change is slow in practice. So there is still work to be done. With the support of the Ministry of Education and Culture, the Institute started to produce extensive online learning material for clear language in public administration in 2019. The material will be made available to everyone.

GOOD LEGAL LANGUAGE MEANS BETTER ADMINISTRATION

Legal language, too, should meet the requirements of clarity, because administrative language everywhere draws largely on legal language and other judicial language. Public authorities reiterate legislative formulations and expressions in their decisions, instructions and correspondence. Moreover, research shows that ordinary people search for information in legislation. Altogether 54 per cent of the public has done so in Norway and 40 per cent in Germany, for instance.

Legal language is a professional language that is largely based on traditions and conventions. Users of this professional language might also hold a misconceived belief that clear language is invariably immature and imprecise. However, it is worth dispensing with traditional language formulations that are not useful. For example, the length of sentences in Finnish legislation are now shorter than two decades ago. Law drafters also have a website at their disposal that gives examples of how to make legal texts more readily understandable in a way that does not compromise any of the requirements of legislative language.

CLARITY IN EU LEGISLATION IS A JOINT ADVANTAGE

EU statutes are either directly applicable in the Member States of the European Union or then they shape the legislation of the Member States. Indeed, inter-institutional agreement (1999/C 73/01) in itself demands comprehensible statutes. Member States are in part responsible for ensuring clarity in legislation. National delegations should raise questions related to language at meetings and contact the translators. In fact, there is a dedicated network between Finnish ministries and EU institutions especially designed for this purpose. The aims of statutes are best met when EU representatives make sure that the texts remain easily understood and readily applicable in their own language even after final agreement has been reached.

INTERNATIONAL ORGANISATIONS IN CLEAR LANGUAGE

The benefits of clear language have been recognised around the world. Although languages are different, linguistic problems and solutions are often similar. For this reason, it is very useful to exchange information and to network. International organisations and conferences in clear language provide a forum for these purposes.

Clarity International and Plain Language Association International have members in over 30 countries, including corporate members and even ministries. Clarity and Plain Language organise conferences in alternate years. Clarity publishes a journal and the archive of journals is open to the public. You can also join Plain's LinkedIn group without being

a member of the organisation, although members have access to broader resources in clear language.

DEFINING CLEAR LANGUAGE

A communication is in plain language if its tone is respectful and its wording, structure, and design are so clear that the intended readers can easily find what they need, understand what they find, and use that information.

The definition underlines how readers experience texts and what they gain from them. Public authorities naturally have a duty to communicate and interact successfully, but successful communication and interaction are also an asset. There are guides in different languages describing the linguistic characteristics that make texts clear. The definition is based on a joint formulation drawn up by international clear language organisations.

LANGUAGE PLANNING IN TWO NATIONAL LANGUAGES

Finland is a bilingual country where both Finnish and Swedish are legally binding official languages. Government authorities are expected to provide services in both languages, and this also applies to local authorities in bilingual municipalities. The only exception is the autonomous region of Åland, where Swedish alone is the official language.

Since Finland is bilingual, large volumes of official documents are produced in both Finnish and Swedish. Many of the Swedish texts are translations of the Finnish versions. This means that language planning in Finland differs considerably from that in Sweden. Both public services and communications content in Finland must be identical in Finnish and Swedish. For this reason, Swedish texts as well as the names of public authorities and services have to be streamlined with the formats used in Finnish, while still following the general norms of Swedish. As language experts, translators can often identify problems and lack of clarity in texts, so they can help improve texts in both languages.

Swedish language planning in Finland

The main responsibility for Swedish language planning in Finland lies with the Swedish Department at the Institute for the Languages of Finland. The department collaborates with their Finnish-speaking colleagues and with the Language Council of Sweden. Language planners give courses for translators and public officials and answer queries made by public authorities, the media and the general public.

The Government Swedish Language Board coordinates Swedish language matters related to government authorities. The Board publishes a manual titled *Svenskt lagspråk i Finland*, which promotes the use of clear and com-

prehensible Swedish language in statutes. It is an excellent tool for all those who prepare and translate administrative texts and statutes in Swedish.

The Swedish language faces many challenges in Finland. Despite statutory obligations, in practice there are many shortcomings, some of which are described in the Government report on the Implementation of Language Legislation (2017). The core purpose of linguistic rights is that everyone can participate in developing society. However, it is difficult to participate if you cannot understand what is going on. Language planning therefore aims to make administration clear and easy to understand in both national languages.

NAMES MAKE A DIFFERENCE

The name of an organisation is generally the first point of contact people have with public authorities. An effective administrative name is a useful way to convey essential information about the organisation and it does not get confused with commercial names. A well-suited place name directs you smoothly to the right place and is streamlined with names that are commonly used when referring to different parts of the country.

Apposite names are also user-friendly, i.e. easy to write, pronounce and remember. It also takes into account both national languages in Finland and complies with the principles of orthography.

General government names consist of the names of

- 1) *government agencies and their sub-organisations and*
- 2) *other names given by public authorities, such as names of administrative areas and road names as well as names of public services.*

Problems with administrative names

The planning of administrative names in Finland takes place in a number of bodies, and statutes governing decisions on names are scattered in different legislative acts. Names are planned and decided by those who do not necessarily have expertise in language matters or nomenclature. This has led to various problems. For example administrative regions have been given names that make it difficult to place them in the right part of the country, and organisations use acronyms (e.g. *Traficom*) that are easily confused with business names. Along with abbreviations, problems exist with abstract expressions and names of organisational units, such as *Psychiatry*, which lack elements (e.g. *Department*) that illustrate the organisational hierarchy.

Measures to improve nomenclature

Tools that can be used to generate more appropriate and adequate names are legislative prescription, assistance with the planning of nomenclature and the appointment of

working groups for nomenclature in public organisations. In 2019, the Institute for the Languages of Finland will start drawing up an online manual designed for those in public administration who plan names. Together with the National Land Survey of Finland, the Institute also submitted a proposal in 2011 to draft a law on place names. The law should stipulate who is entitled to decide on place names and their spelling, who is responsible for registering names and which place names public authorities are obliged to use.

CLEAR, COMPREHENSIBLE AND INCLUSIVE

Clear language for administrative purposes is generally defined as being clear and comprehensible. A broader definition could also be applied, as is the case in Finland's Administrative Procedure Act, which obliges public authorities to use language that is inclusive, clear and comprehensible.

When aiming for clear language for administrative purposes, the requirement of inclusivity should therefore also be remembered. Moreover, it is important to recognise that clarity and comprehension are two different dimensions of language use.

Clarity helps identify the essence

When language is clear, gleaned the text visually is effortless and the reader can easily identify different parts of the text – words, sentences, paragraphs and contextual entities.

Both the spelling and use of punctuation comply with the rules of grammar, and sentences and paragraphs are clearly structured and simple. The text is divided into units that are easy to grasp and include descriptive headings and subheadings. Readers are not burdened by information that is not pertinent to them.

Comprehensible texts take into account the reader's knowledge and needs

When comprehensible language is used, the text builds on what is already familiar to readers and meets their needs.

The words and expressions used are for the most part familiar to the readers, and unfamiliar terms are explained. The content is described in concrete terms, and new information ties in with what is already familiar to the readers. The text illustrates the background information and reasoning on which the facts in the text are based. Moreover, readers are not expected to be familiar with the procedures and practices used in administration; instead, they are explained to the readers so they can handle matters.

Inclusive texts respect readers and are apposite

When language is inclusive, the tone of the texts is friendly and respectful towards readers. Different readers and their needs are taken into account, so that each reader can feel that they are being addressed and can relate to the text.

People are referred to with respect and their qualities and actions are described in a dignified manner, reasoned

facts are explained properly from the viewpoint of the reader and instructions for action are formulated in an amicable way. The role of public authorities in the texts is that of an active party to the dialogue, one that is ready to listen and treat all citizens equitably and with respect.

CLEAR LANGUAGE IS A CORNERSTONE OF DEMOCRACY

Communities rely on language and communication. Whether you are dealing with the maintenance of railway tracks or organising mass vaccinations, the work invariably involves language and texts, such as making action plans and communicating about them.

Language takes on greater weight when it is being used by public authorities. This is because the powers of public authorities are based on laws, and laws are texts. Public authorities also use language and texts, such as decisions, instructions and agreements, to wield power of execution.

Comprehensible language generates savings

Different texts are a core content and product of government agencies, and many texts are the by-product of laws. For example, the Social Insurance Institution of Finland made around 19 million decisions on benefits in 2018. One quarter of the staff in child daycare centres use one or more days a week to record things on paper or computer. In care for the elderly, between 92 and 97 per cent of all staff members record things on a daily basis.

The production of texts takes up a considerable amount of resources in all kinds of work. This means that language is one area where there is room for more efficiency and where savings can be made. Indeed, by improving their texts and online information, the Finnish Immigration Service managed to reduce customer calls by students applying for residence permits by close to 80 per cent. The State Treasury made the language used in their decisions clearer, which helped reduce the number of certain requests for review by 30 per cent.

Language to help become part of society

Language also plays an instrumental role in ensuring that general government aims and values, such as openness, equality and parity, are actually materialised. The type of language used by public authorities and politicians largely determines how well citizens can understand, follow and evaluate activities in society. Texts that are difficult to understand and names of organisations that are not transparent can make it difficult to understand administrative structures as well as alienate people from decision making and engagement in society, which in turn can eventually put democracy at risk.

Language and communication can become a barrier also when people need help from society. In today's world of digitalisation, people have to deal with texts independently without assistance. At the same time, more people than ever need easy-to-read language. New ways of

handling matters place greater demands on language than ever before. By allocating resources for clear language, we can prevent and reduce inequalities and the risk of social exclusion of those in a more vulnerable position.

EASY-TO-READ LANGUAGE CAN HELP REDUCE SOCIAL EXCLUSION

It is estimated that about 10 per cent of the Finnish population needs easy-to-read language in their lives. Easy-to-read language offers equal opportunities for participation and access to information for those with linguistic impairments. The underlying reasons for linguistic impairments can be both inherent or acquired as a result of illness or injury. For some people in Finland, it is also the case that neither Finnish nor Swedish is their mother tongue.

Easy-to-read language has been promoted in Finland since the 1980s. The problem is that public authorities in Finland still only use easy-to-read language to a limited degree. One notable exception is the Social Insurance Institution, which has produced a leaflet on their benefits in easy-to-read language and has also started preparing easy-to-read webpages in 2019. The Ministry of Justice, too, has published easy-to-read instructions on how to vote in all general elections since the 1990s. Under the implementation of the Accessibility Directive, public services in digital form should provide already by autumn 2019 information at a level of understanding that is comparable to easy-to-read language.

An easy-to-read tool was devised that makes it possible to identify easy-to-read language. It can be used by specialists in easy-to-read language and language professionals to assess whether any given text meets the criteria of easy-to-read language.

THE DIFFERENCE BETWEEN EASY-TO-READ LANGUAGE AND STANDARD LANGUAGE

Easy-to-read language in Finland is not a language of its own; instead, it is a form of Finnish or Swedish. The vocabulary and sentence structures used in easy-to-read language are simpler than those used in standard language. The content in easy-to-read language is also often more limited and contracted, and more complicated content is explained to readers using concrete examples.

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Sources:

<https://avoinhallinto.fi/tyon-tueksi/koulutusmateriaali/>

www.kotus.fi/plainlanguage

How to write good texts in the workplace



How you can improve administrative texts

TEXT PURPOSE

- » Is writing a text the best approach or would a phone call be more expedient?
- » Assess the purpose of the text.
Is it designed to inform readers, convince them or appeal to them to act in a certain way?
- » Choose the main purpose and emphasise the aspects of the text that serve this purpose.

AUDIENCE

- » Consider the audience. Are they people who know the topic well (your colleagues or experts in the matter), or are they people who are perhaps not so familiar with the topic? Use vocabulary and text structure that are familiar to the reader.
- » Think about the tone of the text and how it comes across to the reader. For example, assertive statements or legal expressions that you might consider neutral may sound rude or threatening to the reader.

CONTENTS

- » Ensure that the text includes enough background information and context for the reader to understand the essential message. Would additional information, such as a link, brochure or contact details, help the reader?
- » Make sure to omit information that is only relevant to your supervisor or colleagues. Information that is not essential might distract the reader from concentrating on the main topic of the text.

FIT FOR PURPOSE

- » Start with the main point, unless there is a particular reason not to do so. Use subheadings to arrange information into logical sections. Use vocabulary familiar to the reader, and if technical terms cannot be avoided, explain them.
- » Use lists, diagrams and other visual presentations, including colours.
- » Decide whether the text could be made shorter.

NAMES, JOB TITLES AND TERMS

- » Decide who should take part in creating new names and terms. Allow time for consulting in-house experts as well as language and other specialists who can give advice on how to formulate new names and terms. Consider whether clients or other stakeholders should also be consulted.
- » Are the names, titles and terms clear and easy for clients to use?
Remember that all names and abbreviations must work in all relevant languages. Names that are not transparent can be difficult to remember and use.
- » If equivalents for names are needed in foreign languages, they are translated separately. As a rule, avoid using foreign-language names in texts other than those written in a foreign language.