# A Review of the Norwegian Plain Language Policy

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**Abstract.** In this paper, we examine the policy documents that define the Norwegian policies on language use in the public sector, with an emphasis on how ICT is mentioned as a tool for creating a public sector language citizens find easy to understand. Norway and other countries have had a series of projects aimed at making the public sector use plain language in their communication with citizens. We present two example cases of successful plain language use and one less successful case, and discuss these cases using the lens of new institutional theory. We argue that the institutional context of change and user-centricity have had a major impact on the success of our example cases.

**Keywords:** eGovernment, public sector renewal, plain language, institutional theory, policy

## 1 Introduction

Language use and language policies are matters of great public interest, as language can be an instrument of inclusion or exclusion, discriminate or include certain groups and act to reinforce or break up existing power structures [1]. The ways in which we use language can be seen as a constant ideological battle about discourse, social control and social structure [2].

Public sector, or bureaucratic, language, has emerged in its current form because of the bureaucratic logic of impersonality, rationality and objective, rule-based decision-making [3], and the result has often been a language system that is difficult for users of public services to interpret. Partly because of the need for precise formulations dictated by bureaucratic logic, but also because of professionals using the terminology specific to their professions.

From a democratic perspective, the use of complex language is a problem, as it denies citizens the opportunity to participate in policymaking and to influence decision-making. The representative democratic ideal is that every citizen has both the right and the opportunity to be heard by elected officials. The use of language may be a major barrier to democratic participation and citizen access to the public sector, and plain language is thus an important prerequisite for eGovernment and eDemocracy[4]. This

adfa, p. 1, 2011.

has been discussed since the 1980's when several scholars began arguing for the use of "plain English" in the public sector [3], as bureaucratic language had become difficult to understand for ordinary citizens.

Plain language has emerged in recent years as an international topic[1], and in Norway, the plain language project emerged in 2008 as part of the government's initiative to modernize the public sector [5]. The project is grounded in several policy documents, and ICT plays a central role in this effort [6], with a clear user-centric perspective on how digital communication channels should function.

Our objective with this paper is to examine the relationship between policy, technology and institutional culture in the plain language project. We do this by analyzing policy documents addressing plain language, looking for explicit mentions of ICT in these documents, and by examining two example cases of successful plain language work: The Norwegian tax administration and the Norwegian Public Roads administration. We contrast these successful cases with the case of the welfare agency NAV, which has not been as successful [7]. We apply institutional theory as our lens in order to explain these different results. This approach addresses Axelsson et al's call for research on policy documents in a wider range of contexts [8].

The rest of the paper is structured as follows: Section 2 presents related research on language use and institutional theory. Section 3 outlines our research approach. In section 4 we present our findings from the analysis of policy documents and example cases, and we discuss these findings in light of institutional theory in section 5. Section 6 presents our conclusion and suggestions for further research.

## 2 Related research

In this section, we discuss previous research on plain language, provide a brief overview of the Norwegian efforts in this area, and situate plain language in the wider context of digitizing the public sector in order to make it more effective and efficient. Further, we provide a brief overview of institutional theory as our analytical lens.

### 2.1 Plain language from a user-centric perspective

Plain language is defined as "correct, clear and user-centered language in texts from government" [9] (authors' translation), and should involve organizing information so that the most important points come first, breaking complex information into understandable chunks, using simple language and defining technical terms and using the active voice [10]

Researchers have discussed plain language at least since the 1980's [3]. OECD countries have emphasized the use of plain language in government for long time, and 23 countries had implemented plain language strategies in the year 2000, with varying degrees of success. The OECD considers plain language as important for facilitating transparency and accountability in government [11]. In the Nordic countries, Sweden

[1] See f.ex the plain language network: http://plainlanguagenetwork.org

has been the driving force of plain language, and the Swedish efforts to simplify government communication has been an inspiration for Norwegian policy-makers [12].

Plain language did not receive much attention in Norway until the government initiated the project “klarspråk” (plain language) in 2008. The objective of the project was to improve communication between citizens and government, and the project involved more than 60 government agencies at the national level [5]. Evaluators [5] considered the initial project successful, and it was renewed in 2013 as the project "Plain language in public administration". This recent project is a collaborative effort between the Norwegian Agency for Public Management and eGovernment (DIFI) and the Norwegian Language Council. DIFI has created an online course for plain language use, and DIFI in collaboration with the language council has set up the web site “klarsrpåk”, which provides guidelines, case studies, examples of good communication, language games and quizzes, as well as a project guide for planning and executing plain language projects in government agencies [12].

In order to involve municipalities as well as national government, the municipal organization KS has become involved, and is currently offering plain language courses to municipalities and working on guidelines for plain language, which will be presented as an e-learning application when completed. They have also set up a plain language award that goes to the municipality that has been most active in promoting and using plain language in the past year [13].

There are several approaches to evaluating plain language. Readability indexes are algorithms that attempt to calculate the readability of a text [14]. The two main index types are readability instruments aimed at assessing print and web-based information and word recognition and comprehension tests [15]. These indexes measure for example character, word and sentence length to determine the complexity of a text [15]. By paying attention to the number of words and syllables we use when writing, we can make our texts easier to understand [16]. However, a recent study indicated that readability indexes are not necessarily the most reliable tool for plain language work [17]. Nonetheless, readability indexes remain one important part of the plain language toolbox, and there is ongoing research on the automation of text simplification, where readability indexes are applied along with synonym dictionaries to replace difficult words in sentences [18]. The second approach is to apply writing techniques aimed at clarity. These techniques involve guidelines for the structuring of texts, choice of words, layout and more. There are several published guidelines, focusing on different areas of the writing process [19]. The third approach differs from the other two, in that the focus is on evaluating the result of a text; How well is it understood? Are readers able to act on the content? Visual representation and communication is seen as important in this approach, and usability testing is the preferred way of evaluating texts [19].

The Norwegian plain language project recommends that writers should emphasize the latter approach, but does recommend some use of guidelines and readability indexes as supplements to user evaluations [9]. However, both DIFI’s online course and the “klarspråk” web site’s writing tips rely heavily on checklists and examples of structure and writing styles. The project guide presents guidelines and examples of usability testing, recommending this for agencies who are working consistently on plain language.

Plain language is, in both national and municipal policies, placed in the context of modernization and digitization of the public sector, and mentioned as an essential aspect of a user-centric government. In the white paper "Digital Agenda for Norway" [6], the government outlines its policy for a cost-efficient, digitized public sector. One of the two key objectives of the white paper is to create a citizen-centric mindset in government. Public services should be presented as coordinated and complete, even if a service involves several agencies and levels of government. Information sharing is another key element of the policy. Services that are not designed form a user-centered perspective tend to have a much lower rate of adoption [20]. Usability testing is essential in user-centric government [21], hence the strong focus on testing in the Norwegian policy. In public sector projects, the user groups are many and diverse, and there can be very large differences in the objectives of citizens using the system and the government officials at the other end. This presents an additional challenge for user-centric government [22], and could also be seen as one of the reasons why the Norwegian plain language project downplays the importance of "simple" language. Certain user groups are both able to and require, communication to be precise and sometimes complex [9].Usability testing with selected target groups is thus the only approach that can facilitate these many and varied user groups.

Despite this strong policy focus on user-centricity, eGovernment projects have had a tendency to be focused around the service being delivered, and citizen needs have not been taken into account [23]. In the next section, we present institutional theory as a possible explanation for this.

### 2.2 Neo-institutional theory and organization identity theory

From a Neo-Institutional perspective, the concept of plain language might be considered one of many recipes for modernizing the organizational field of public sector organizations within the ideas of New Public Management, which might be characterized a global mega trend in modernizing the public sector organizations since the introduction in the 1980's [24].

Organizations adapt to what they believe society expect from them [25] and organizational changes thus emerge as a result of isomorphic processes [26] not necessarily founded in instrumental and rational reasons alone. This leads to institutional isomorphism and similarity between organizations [26]. However, when the institutional environments are ambiguous and pluralistic, there is a tendency of decoupling action from formal structure in order to maintain organizational efficiency [25].

As Meyer and Rowan [27] suggest, organizations embrace the wider culture and values institutionalized and legitimated in the society. Hence, the introduction of plain language may be explained within the frames of modern values and organizational phenomena like citizen-centrism, consumer dialogue, impression management and organization image.

Despite the focus on legitimacy through ceremonial changes and the tendency of decoupling action from formal structure, the adoption and implementation of the concept of plain language might be characterized as organization identity work [28].

Within a dynamic perspective on organization identity [29], an ongoing and ever moving relation between culture and image is affecting organization identity – "where we come from" and "who we are becoming" as an organization. This tension between the roots, history and traditions of the organization and the future represented by the image is to a great extent occupied with aligning the organization to expectations from the environments and the society.

Focusing only on "who we are becoming" might lead to adoption of plain language as neither accepted by the employees nor implemented and used in accordance with the ideas of the concept. On the other hand, focusing only on culture, traditions and the past might cause organizations to become immune to impulses, demands and changes initiated in the external environments. This might explain resistance to change, and should be taken in consideration when adopting concepts like plain language.

Seemingly contradictory theoretical perspectives like neo-institutional theory and organization identity theory might be of crucial importance when explaining adoption and implementation of new concepts. Formation of identity and construction of legitimacy through isomorphic processes are two sides of the same coin [30]. Thus, adopting and implementing plain language without involving and connecting with the culture, roots and traditions of the organization presumably will lead to ceremonial changes with no or little influence on the quality of dialogue with the citizens. In accordance with [31], we suggest a multidimensional time perspective when adopting new concepts. In order to succeed we recommend paying attention to both the past traditions and at the same time focus on the future, including changing expectations in society.

## 3 Research approach

The purpose of this paper is to examine the relationship between policy, technology and institutional culture in the plain language project. Policy documents can carry ideas from high-level to concrete policy [8]. This paper addresses the call for research on policy documents in a wider range of contexts [8], by examining policy documents in the Norwegian Plain language project. The study was conducted using a qualitative, interpretive approach.

We have collected the policy documents that the Norwegian Language council report are central to the plain language projects: Two white papers outlining the government strategy on language and digitization[2], the government communication policy[3], the egovernment policy[4] and the strategy for accessibility[5]. We also have e-mail interviews with representatives from DIFI and KS, where we asked about status and future plans for the plain language project. Data for the two example cases are from DIFI's evaluation of government organizations working with plain language.

A policy analysis process can focus on policy problems, performance, expected and observed outcomes, as well as the actions that a policy leads to [32]. We focus our

[2] st.meld 27 (http://ow.ly/8kLj308wr5q) & 35 (http://ow.ly/jvut308wraz)
[3] http://ow.ly/h9Ku308wrlE
[4] http://ow.ly/C7HB308wt16
[5] http://ow.ly/LbOb308wrt6

analysis on problems (understood as target audience, value propositions and social aspects of the policy) and expected outcomes and actions, especially involving communication and ICT. Actors, the acts performed by actors and their engagement with artefacts are typical characteristics of an interpretive approach to policy analysis in concrete cases [33]. Analysis of the documents have been conducted using discourse analysis [34] We have chosen two example cases, the Norwegian tax administration and the Norwegian Public Roads administration to examine how policy flows from high-level objectives to practical implementation. We apply institutional theory as our lens in order to explain why these two projects were successful in translating policy into action.

# 4 Findings

## 4.1 Policy analysis

We have analyzed five policy documents, explicitly mentioning plain language: The «digital agenda» and «language policy» are white papers from government presented for discussion in parliament. The government communication policy presents the high-level policy for communication at all levels of government, and is a framework that can be used for further planning. The government accessibility strategy outlines the strategy for including people with accessibility challenges in society, and the language and digitization policy outlines the plan for modernizing and renewing the public sector. Table 1 summarizes the problem areas, plain language and related ICT aspects of these policy documents.

The five policy documents deal with plain language from different perspectives. The *language policy's* purpose is to outline a policy for the continued use of Norwegian language in all levels of society. Here, plain language is addressed as important for citizens, but the policy also discusses the need for complexity and emphasizes language education. The policy only mentions ICT as a contextual factor: As a driver for the requirement of higher literacy skills and as a threat to small languages such as Norwegian.

The *communication policy* builds somewhat on the language policy, but the purpose is to facilitate communication between citizens and government. Information and inclusion in public matters is the focal point of the policy. Plain language is mentioned as being important in order to reach the objectives of openness, participation and inclusion. ICT receives little attention. The only mention if ICT is that the public sector needs to use the possibilities offered by new communication technologies.

The *eGovernment policy* is more explicit on the role of ICT, and is the first document where digitization and plain language is set in the context of a more efficient public sector. Digitization is seen as essential for service delivery and the inclusion of all citizens, and the policy is more explicit on which tools (digital mailbox, user-centric design, common core components and digital communication as standard) to implement.

The *Accessibility strategy* addresses the needs of disabled people. In 2014 reguluation was introduced to facilitate accessibility in digital communication, and this strategy

outlines the process for an accessible public sector. The document states that plain language is essential for accessibility, especially for people with certain kinds of cognitive disabilities. ICT plays a large role in this, and the document outlines 14 detailed points for accessible ICT. The points discuss what to do, but the responsibility for how is delegated to DIFI.

The *Digital agenda* is the most recent policy, released in 2016. The ambitions of the digital agenda pull together a lot of the content from the previous policies, and present a vision of a user-centric government that talks in a way people can understand. This document is much more emphatic in stressing the point that government agencies can no longer act as silos, but need to work together to solve complex social problems.
Together, the five policy documents present a clear vision for a user-centric government, where plain language is essential for inclusive and efficient communication.

| | **Problem area (target audience, social aspects, values)** | **Communication & plain language** | **ICT/outcome aspects** |
|---|---|---|---|
| **Language policy (2008)** | Create a common language policy across government to ensure consistency. Preserve the Norwegian language in a globalized world. Reveal hidden, language-based power structures. Points to socio-demographic differences in language skills. | Acknowledges role of tradition in language use as barrier to plain language. Simplify bureaucratic language where possible, but some texts require precision and complexity. Improve language education. | Information society increases necessity of mastering language. IT (Internet) a challenge for continued use of Norwegian language. |
| **Communications policy (2009)** | Inform and include citizens in policy-making and service creation | Openness, participation, reaching everyone, coherence in communication across gov' agencies. Plain language important to reach everyone. | Exploit new technologies |
| **eGovernment policy (2012)** | Digitize the public sector to a) create a more effective and efficient public sector, and b) to improve service delivery and communication with citizens. | 1/3 find it difficult to understand public communication. Objective: All communication from government should follow plain language guidelines | Government communication to be digital (digital first choice).<br>Digital mailbox<br>User-centricity<br>Create common set of core components |
| **Accessibility strategy (2015)** | Create a society where everyone is able to participate, also disabled people | Plain language important for accessibility | 14 detailed policies on ICT/accessibility. Addresses "what", but not "how" |
| **Digital agenda (2016)** | ICT is rapidly changing society on all levels. We must use ICT to create a) a user-centric, effective and efficient public sector and b) Innovation, value and equal possibilities for participation | Plain language increases use of digital services, and ensures more people can take part. Young adults no not understand how to use current services. | User-centricity.<br>Coordination across government departments.<br>Digital first choice.<br>Digital skills in schools.<br>Continue to build digital infrastructure (mobile, fibre) |

Table 1: Overview of policies

### 4.2 Example cases: Successful digitization and plain language

The Norwegian tax administration and the Norwegian Public Roads administration have both worked extensively with plain language in the past years, and both agencies report that plain language has led to measurable improvements.

The tax administration has been leading the way in digitizing the public sector, and the main driver is the change from defining themselves as a control and surveillance agency into a service agency whose purpose is to help citizens, organizations and businesses. At the same time, they are focused on becoming more effective and efficient, and are working to improve digital self-service solutions on their web site, which is constantly updated. Plain language is part of this change into a user-centric service organization. When changing something, they start by inviting user feedback via their "beta" blog. For example, their tax return simplification project received feedback from 11.000 users and was tested over several iterations. They combined workshops with employees, aimed at understanding the internal processes and regulation, with user testing and user feedback. This thorough understanding of the regulations and processes involved in tax deductions allowed the design team to create a front-end where users did not have to know the details in order to get the reporting right. The results have been positive. The commuter part of the project led to a 40 % decline in complaints on tax returns, a 200 % increase in site visits and a significant reduction in calls and e-mails about commuter tax deductions as users were able to use and understand the information on the web site.

The public roads administration ran a plain language project from 2011 to 2012. The project was run by their communication department, and included users from several of the other departments in the agency. After the project was completed, they implemented plain language as part of the everyday work processes in the organization. As with the tax administration, the public roads administration also has a holistic approach, seeing plain language as part of their overall drive to become a user-centric organization. They have redesign their web site emphasizing self-service in order to save resources and be more efficient. Frequently used services such as change of ownership forms for cars are now digitized and automated, making the process of buying and selling used cars much easier. They have also worked on changing the wording of standard letters, in order to make them easier to understand. Each of these letters are sent to a million users every year, so even a marginal increase in the public's ability to understand and act on a letter provides significant savings. The new letters were user-tested over two iterations. In the final test, users reported they spent significantly less time understanding the message and the actions they were required to take. Internally, the new letters led to a 40% reduction in calls from frustrated citizens who did not understand the content.

In contrast to these successful cases, we have the NAV reform, where three agencies (unemployment, social services, welfare) merged into the welfare agency NAV. Despite a user-centric focus, NAV is criticized for being removed from the users and for extensive use of bureaucratic language [35]. A major reason for this is said to be the merger itself, with massive challenges stemming from the merger of three different organizational cultures [7]. While the plain language policy development reads as a

linear progression, the policies behind the NAV reform have suffered from several changes in direction both before and after the merger was initiated [7]. While NAV has been slowly improving, they still lag far behind colleagues in other agencies and users, in usability tests conducted by the first author, report that navigating the self-service web site can be both frustrating and difficult.

## 5 Discussion

Both the tax and public roads administrations report that organizational change was essential for their plain language success. While plain language initially was a separate project, it was later implemented as an integrated part of everyday work tasks and practices within the wider context of user-centricity and modernization through citizen self-service. Employees are positive, as they see that this approach has benefits in the form of fewer phone calls and complaints and more time for other and more interesting work.

While these two examples show how plain language and digitization can be implemented, the e-mail interviews with DIFI and KS confirms that despite a decade of plain language work, a lot remains to be done. Municipalities have only recently begun working with plain language, and large agencies such as NAV still have a long way to go.

Organizational theory can help explain these differences. Organizations adapt to the wider societal context, but in pluralistic organizational environments decoupling can occur [25, 26]. The tax and public roads administrations have internalized the digitization and plain language policies, and are working towards becoming service-organizations with the "client" (citizen) in focus. They have done this by seeing plain language, modernization and digitization as parts of an overall strategy, and made sure that this strategy is made part of the organizational culture. They have embraced the values legitimated in society [27], as communicated by the policy documents related to plain language. NAV on the other hand, has struggled with a huge reform, having to merge cultures with at times very different understandings. Evaluations of the reform [7] points to the problems stemming from this as well as the changes in the policies related to the reform as important for the current situation in the agency.

The organization identity tension between where we come from and who we are becoming [28] [29] is also handled differently. The tax and public roads administrations have managed to handle this tension. While they are focusing heavily on the future and implementing strategies that ca be seen as a clear break with the past, they remain anchored in the existing organizational culture, as exemplified in the workshops held with case handlers, aimed at understanding and building services around existing processes, but which also manages to appear as user-friendly and understandable to citizens. NAV's problem with merging different cultures appears to create a stronger tension, as employees struggle to find their place in a new organization. This makes it more difficult to cope with the expectations from policies on user-centricity and plain language. Management and policy has a strong focus on "who we are becoming", while employees seem more concerned with culture, change fatigue and finding their place.

## 6 Conclusion and future research

In this paper, we have examined the policy documents relevant for plain language work in Norway. The five policy documents we have analyzed reveal a gradually evolving policy, which begins with a pure language focus and evolves into a holistic and ambitious plan that sees plain language as an important part of creating a more efficient and user-centric public sector. Further, we have examined example cases to analyze how agencies translate the policy to action. Finally, we have applied organization theory to discuss the differences in results in our example cases, showing that policy implementation require organizations that are able to successfully handle the tension between past traditions and existing organizational culture, and future expectations and direction.

The main limitation with our study is that we have used secondary data, DIFI evaluations, in discussing the cases. While this is sufficient to provide an overall picture, future research should focus on in-depth observation of government agencies in order to verify our conclusions.

Further, we argue that there is a need for research into other aspects of plain language. We have discussed the organizational aspect of translating the plain language policy to action. Another issue is how the policies are interpreted and implemented. Plain language is easily seen as a text-only issue, involving readability of information. The policy documents discuss why and what should be done, but leave the how to the agencies implementing policy. The egovernment and digital agenda policies do mention briefly that language can also involve visualization of information, and we argue that while simplifying language is important, other possibilities to increase understanding of public sector information, mainly by using techniques of visualization, are equally important. Techniques such as flowcharts, timelines, map-based information, video and animation can play an important role in helping citizens understand information from government. There is evidence of this in the cases, as both agencies have redesigned their web sites to be visually oriented. The public roads agency have created a map-based solution for traffic monitoring and flow. The tax agency has redesigned several of their services as step-by-step guides relying heavily on visual and typographic elements. There are other examples as well, found in municipalities and other government agencies. The digital planning dialog[6], implemented in several municipalities, is a map-based solution for municipal planning where visualization has replaced long written documents. Several municipalities have implemented video streaming of meetings, survey results are presented using visualization[7] and open data policies are being implemented. However, these remain scattered examples. We are still sorely lacking an updated policy where the concept of plain language also includes these aspects, and future research should examine how different forms of communication can complement each other in order to continue working towards user-centricity and plain language as tools for modernizing government.

[6] http://ow.ly/eIeY308EeSC

[7] www.bedrekommune.no

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