



Financial Consumer
Agency of Canada

Agence de la consommation
en matière financière du Canada

FCAC Clear Language and Presentation Research Paper - 2009

Canada The wordmark for Canada, with a small red maple leaf icon integrated into the letter 'a'.

About FCAC

FCAC fosters greater understanding of financial services in Canada through its consumer education materials and interactive tools. It provides accurate, objective information about financial products and services, and informs Canadians of their rights and responsibilities when dealing with federally regulated financial institutions.

In addition, through its financial literacy programs, FCAC helps Canadians increase their financial knowledge and confidence in managing their personal finances.

FCAC also ensures compliance with the consumer protection laws, and monitors codes of conduct and public commitments that apply to banks and federally incorporated trust, loan and insurance companies.

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Background and Objective of the Project

For some time the Financial Consumer Agency of Canada (FCAC) has provided clear language information to consumers. Now, however, we wish to establish a more formal list of clear language and presentation principles for use in our consumer education and financial literacy initiatives. Using these principles as guidelines, FCAC will review and adapt its consumer material to better serve the needs of Canadians. The aim is to help them understand their personal finances and the financial system in general.

The principles are based on research that examined current and past clear language initiatives at the federal, provincial and international levels.

This document describes the internal principles FCAC has established, as well as the supporting research that justifies those principles and their implementation in consumer education activities.

Note: Appendices have not been included. If you would like access to the entire clear language and presentation research paper please feel free to contact FCAC to request a copy.

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*Please note that if you are interested in seeing the background research (appendices) that went into the development of FCAC's internal clear language and presentation principles please feel free to contact FCAC and a copy of the research will be provided.

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Section I: Current Clear Language Commitments in Canada

Commitments to clear language in Canada

Government of Canada policy: Federal government institutions have an obligation to communicate clearly and effectively with the public. They must use plain language and proper grammar in their communications.¹

Plain language and FCAC: FCAC has undertaken several clear language activities in recent years, as outlined in its business plan. The agency's internal style guide calls for language that is clear, objective and easy to understand.

- Consumer education: FCAC is mandated to expand consumer education in the financial sector. In fulfillment of its mandate, FCAC produces a wide array of educational material for consumers. To effectively reach and educate the greatest number of consumers, FCAC publications must use clear language and presentation.
- Financial literacy: Given the complexity of the financial sector and its various components, it is important to provide clear, easily understandable communications and educational materials.

Consumer provisions of the *Bank Act*: FCAC oversees several pieces of legislation that call for clear and simple language. However, before setting principles for industry use, FCAC has established a set of guidelines for internal use.

Banking industry public commitments: In March 2000, members of the Canadian Bankers Association (CBA) committed to providing banking information that customers can easily understand and use. FCAC monitors the CBA public commitment. In *Plain Language Mortgage Documents*, CBA outlines its commitment to plain language as well as its plain language principles.²

¹ Treasury Board of Canada Secretariat, *Communications Policy of the Government of Canada*, 2006.
<http://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12316§ion=text#cha5>

² See Appendix 6 for a comparison of FCAC's proposed principles and CBA's principles.

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Section II: Summary of Research

2.1 Methodology

As a first step, we conducted a comprehensive literature review. The aim was to acquire a large research base of existing clear language material that was both credible and relevant. After establishing a research base, we evaluated and compared the various sources to identify common principles and best practices.

For a detailed analysis of the various clear language sources documented, see Appendix 3.

The principles we propose for FCAC derive from common principles mentioned in most clear language resources. These core principles are supported by outside expert advice and qualitative research findings.³

2.2 Clear language initiatives around the world

During our research for this proposal, we reviewed several international sources. Below are summaries of relevant international and Canadian sources we reviewed.

United States (U.S.)

The United States government has been an active proponent of clear language for several years. The current administration does not have a formal clear language initiative in place, but several federal and state departments have clear language strategies and standards. In 1998, the Clinton administration issued the *Plain Language Memorandum*, which officially sanctioned clear language use in the federal government. The memorandum required all agencies to use clear language in all new documents. Following are some U.S. plain language initiatives that we used in developing the proposed principles for FCAC.

The Plain Language Action and Information Network (PLAIN) is a group of federal employees from different agencies and disciplines, PLAIN operates www.plainlanguage.gov—a Web site that provides information on current initiatives in the United States and internationally. PLAIN also produced the *Federal Plain Language Guidelines*. This guide is particularly relevant to FCAC because it was created by and for government employees to improve their written communications for the public.

³ *Qualitative Study—Less Literate Consumers' Reaction to Education Material on Banking*, February 2004, Créatec +.

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In 1998, The Securities and Exchange Commission (SEC) produced the *Plain English Handbook*, a thorough and extensive plain language guide written specifically for the Commission.

The Federal Aviation Administration (FAA) has a strong clear language program with a writing standards document that outlines several clear language principles. The FAA's clear language guide is called the *FAA Writing Standards*.

The *Plain Language Memorandum* refers agencies to the *Federal Plain Language Guidelines* and the *SEC Plain English Handbook* as tools and reference materials for writing plain language documents.

Australia

Australia has no laws or executive memoranda officially sanctioning plain language at any level of government or industry. The focus of the plain language movement in Australia is on legislative clear language drafting.

Plain English at Work is a guide produced by a plain language consultancy for Australia's Department of Education, Training and Youth Affairs and the Australian National Training Authority. It explains how to become a clear language organization, setting out many steps that FCAC has already taken or is now taking.⁴ *Plain English at Work* also has a section with tips on writing in clear language.

United Kingdom (U.K.)

The U.K. government adopted a plain language policy for government forms in 1982. Currently, however, two private-sector groups are at the forefront of the plain language movement in the U.K.: the Plain Language Commission and the Plain English Campaign. The groups work closely with government and each offer accreditation services attesting that a document has passed a rigorous check of clarity, grammar and layout by experts in the field. The Plain Language Commission has awarded the U.K. Financial Services Authority the highest plain language distinction it offers.

The Plain English Campaign produced *The Plain English Guide to Design and Layout*, used to help validate the proposed principles for FCAC.

Sweden

Sweden has one of the oldest clear language initiatives of any of the countries

⁴ For the text of *Plain English at Work*, see http://www.dest.gov.au/archive/publications/plain_en. Appendix 5 contains a section of the guide on becoming a plain English organization.

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researched, and its program has a legal basis. The Ministry of Justice manages Sweden's plain language program. The focus is on legislative drafting and the approach is top-down. The idea is that legislation written in clear language will have an impact on the language used in administrative documents written at lower levels of government.

In 1993, the Swedish government formed the Plain Swedish Group, with the aim of encouraging government authorities throughout the country to start and carry out their own plain language projects. The group organizes plain language conferences and lectures. It annually awards the Plain Swedish Crystal to one or two state agencies in recognition of their clear language work.

European Commission

In 1997, the European Commission launched the Fight the Fog campaign to encourage clear writing in EU institutions. The campaign is responsible for *How to Write Clearly*, a clear language guide.

2.3 Canadian plain language initiatives

There is a substantial clear language movement in Canada but it operates on a project-to-project basis. No government, federal or provincial, has a stand-alone plain language policy.

Public Works and Government Services Canada (PWGSC) has made significant progress in implementing clear language practices, and was responsible for the development of clear language initiatives by the Translation Bureau and Communication Canada.

Translation Bureau

The Translation Bureau created the Language Nook to be a self-learning tool for federal government employees. The Bureau's *Clear and Effective Communication Guide* (CECG) contains extensive information on clear language writing.

Communication Canada

In May 2003, Communication Canada created the *Successful Communication Tool Kit: Literacy and You*. This provides a thorough guide for writing in plain language. It also contains case studies examining how clear language principles were applied to various documents.

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Government of the Northwest Territories (GNWT)

The territorial government has promoted clear language for years. It committed to clear language in its Literacy Strategy and in *Doing Our Part: The GNWT's Response to the Social Agenda*. For several years the Northwest Territories Literacy Council has trained territorial government employees to write in plain language. The Council has produced two publications: *A Plain Language Handbook* and *A Plain Language Audit Tool*.

The Council's program has been moderately successful. According to reports, employees use the training in their everyday work but the government as a whole has not adopted strategies for clear language use. The Council recognizes that clear language training alone is not enough. It has recommended a GNWT-wide commitment and plan to advance clear language use.

British Columbia Securities Commission (BCSC)

The BCSC is a leader in clear language initiatives in Canada. It has trained its staff and developed clear language guidelines for all its written communications. Its *Plain Language Style Guide*, published in 2002, is intended to help employees communicate more clearly.

The BCSC campaign seeks to spread clear language throughout Canada's regulatory system and securities industry. The Alberta, Ontario and Manitoba securities commissions have joined the campaign.

2.4 Lessons learned

The Swedish government has made significant progress in implementing clear language. Its plain language program has a legal basis but the focus has been on legislative drafting in clear language. As a result, the program is not entirely relevant to the purposes of this paper.

The United States' plain language situation is similar to Canada's: departments at the state and federal levels have undertaken programs and initiatives, but there is no overall federal policy mandating plain language use. The FAA and the governments of several states (including Washington and Oregon) have implemented successful clear language programs.⁵

Australia and the U.K. are very active in pursuing clear language. Australia, however, appears to be following the Swedish approach of focusing on clear language legislative drafting.

⁵ See Appendix 5 for more details about the plain language programs in the U.S. states of Washington and Oregon, and the FAA.

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In the U.K., the private sector plays a more visible role in clear language than it does in most other countries researched. Private-sector organizations offer accreditation services to clients that include several government agencies. One of them is the Financial Services Authority.

Most of the countries reviewed offer accreditation services. So does Canada but services here are available only in English. Further research would be needed to determine the viability of clear language accreditation for FCAC.

In Canada, the British Columbia Securities Commission, the Government of the Northwest Territories and the federal Department of Public Works and Government Services are leaders in clear language developments. Each has made significant progress in putting clear language into practice. All three organizations have produced thorough clear language guides and standards that have been consulted and used to support FCAC's proposed principles.

2.5 Rationale for proposed principles overall

Most of the clear language guides reviewed are very similar in content. They differ mainly in wording and the way they categorize the various components. Based on content alone, several of the clear language guides reviewed could have served as models for FCAC's proposed principles, and in a sense they all did. However, we found the Translation Bureau's *Clear and Effective Communication Guide* to be the most suitable model for FCAC's principles.

We used components of several clear language guides to compile the proposed guidelines for FCAC but we categorized the principles more or less in the same way as the Translation Bureau's guide. The purpose was to simplify and reduce the number of clear language principles. Several of the guides reviewed listed seven or more principles. We concluded that we could reduce the number without losing any relevant content.

The comparison table in Appendix 2 shows how the various guides reviewed support the principles established by FCAC.

We also considered two studies prepared for FCAC: *Qualitative Study—Less Literate Consumers' Reaction to Education Material on Banking* and *Qualitative Testing of Proposed MasterCard Plain Language Application Form*. The two studies were particularly relevant to this proposal because they highlighted areas in which individuals with average and low literacy levels⁶ had difficulty in reading and understanding various financial documents. FCAC's proposed principles address all the issues raised by the groups that took part in the studies.

⁶ See Appendix 1 for detailed information on literacy levels.

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Last, we consulted with clear language experts, and took their opinions and recommendations into account in selecting FCAC's proposed clear language principles.

2.6 Rationale for individual principles

Proposed language and presentation principles

1. Know your audience
 2. Make your material understandable by planning your text
 3. Write clearly
 4. Use the visual presentation to enhance your text
 5. Test your material
-

Know your audience

Virtually all the plain language resources we reviewed referred to the "Know your audience" principle.

Make your material understandable by planning your text

Not all the sources we reviewed referred specifically to the principle of making your material understandable. However, most made reference to the underlying requirement of understandability.

Write clearly

Every clear language resource that we reviewed included writing clearly as a key component of clear language writing. However, not all referred specifically to the principle as "writing clearly."

Use the visual presentation to enhance your text

Again, the resources we reviewed often did not refer specifically to visual presentation as a clear language principle. However, all included elements associated with the look of a document.

This principle is particularly relevant for FCAC since a large proportion of its publications are for public consumption and serve as educational material.

Test your material

Almost all the resources we reviewed emphasized the importance of testing a document with the intended audience. Clear language is subjective and literacy levels vary from person to person. Without adequate testing, there is no definitive way to know whether readers will get what they need out of a document.

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Section III: Proposed Clear Language and Presentation Guidelines for FCAC Internal Use

This section outlines several guidelines for writing in clear language. They were chosen from best practices found in a number of existing clear language guides.

FCAC has adopted these principles and will incorporate them into its publications.

1. Know your audience Knowing your audience is fundamental to clear language writing. The intended audience will influence the layout and content of your document.

A. Who is the target audience?

The answer to this question can determine how you structure and write your document. Different audiences have different ways of learning and usually need different information. The approach you use for a general adult audience probably will not work for a specific audience—for example, seniors, youth or Aboriginal people.

B. Determine your audience's literacy level.

As a rule of thumb, develop your information for a high Level 2 or low Level 3 reader. Take each block of information in your document and think how difficult it may be to read and understand. If you ask the reader to perform a task (for example, a calculation), think about the difficulty of the task.

C. Focus on the reader's needs.

- What does the reader need to know most? Make that information stand out or put it first.
- What does the reader not need to know? Cut or shorten information that is less important to your reader.
- What does the reader already know?
- What questions would the reader ask?

Additional tools and guides for help with knowing your audience

- PlainLanguage.Gov, *Federal Plain Language Guidelines*, Part 1, "Thinking About Your Audience"
- Cogem Research Inc., *Information Needs and Strategies of Canadians with Lower Literacy Skills*, report prepared for Revenue Canada
- Health Canada, *Communicating with Seniors*

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- Statistics Canada, *Literacy Skills of Canadian Youth*, International Adult Literacy Survey
-

2. Make your material understandable by planning your text

Use the following guidelines to help readers easily understand your document.

A. Structure

- Present information in a logical order, from most important to least important.
- Organize your ideas in chronological order. You will confuse the reader if you backtrack.
- Stick to one main idea per paragraph.
- Stick to one main idea per sentence.

B. Accessibility

Help readers gain an overview by including, where appropriate:

- a table of contents
- a short introduction
- a short user guide
- a brief summary at the beginning of the text
- examples and comparisons

C. Relevance

- Information should be complete, accurate and concisely presented. Focus on quality of information, not quantity.
- Tailor information to the literacy level of the target audience.

D. Consistency

Be consistent throughout your document with:

- **Tone.** Do not mix personal and impersonal forms.
- **Formatting.** Throughout, use bold, italics, etc. in the same way for the same text elements.
- **Vocabulary.** Always use the same word to describe the same idea or concept.

Additional tools and guides for help with making your material understandable

- PlainLanguage.Gov, *Federal Plain Language Guidelines*, Part 3, “Writing Your Document”

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- Translation Bureau, *Clear and Effective Communication Guide*
 - Communication Canada, *Successful Communication Tool Kit—Successful Written Communication*
 - British Columbia Securities Commission, *Plain Language Style Guide*
 - Information Mapping Canada, *Information Mapping Guide*
-

3. Write clearly

No matter how important the information, you must write clearly to reach readers.

A. Language

- Use simple, familiar words wherever possible.
Example: “those/these,” not “the aforementioned”; “enough,” not “adequate number.”
- If specialized terminology is unavoidable, define each term used and give an example if possible. A glossary of terms can help.
- Appeal to the reader by using “I,” “we” and “you” (first or second person) where suitable.
- Use active voice.
Example: “the group decided,” not “a decision was reached by the group.”
- Use action verbs rather than verb-noun phrases.
Example: say “ship,” not “make a shipment.”
- Use acronyms sparingly. Give the expanded form the first time you use an acronym.
Example: “the Canada Revenue Agency (CRA)”
- Use positive form. Avoid negation when possible.
- Choose concrete rather than abstract words and give explicit information.
Example: “bank account” not “money consolidation and protection tool”
- Prefer the most common, understandable sentence order: subject + verb + object.
- Avoid complex sentence structures with compound subjects/verbs and subordinate clauses.

B. Layout

Font size:

- Choose the font size appropriate for the target audience: 10 to 12 points for specialized readers, 12 points for the general public, 14 to 16 points for seniors and individuals with visual impairments.

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Typeface:

- Use readable fonts such as Times New Roman or Arial.
- Avoid using more than two typefaces in one document.

Sentences and paragraphs:

- Keep sentences short. They should be no more than 15 to 25 words long.
- Paragraphs should contain no more than five to six sentences and be no more than five to nine lines long (the general rule is seven lines plus or minus two).
- Keeping the two previous guidelines in mind, try to vary the sentence and paragraph length throughout the text to maintain reader interest.

Headings and sub-headings:

- Use headings and sub-headings to help readers find relevant information more quickly.
- Highlight or bold important words or sections, but be sparing and consistent when you use these tools. Otherwise they will not be effective and you will confuse readers.

C. Format:

- Avoid dense text or a “wall of words.” This discourages readers. It also makes key information harder to find. If needed, insert more paragraph breaks and headings.
- Use vertical lists and/or bullets where appropriate. In general, a good number of bulleted or listed items is five to nine (the general rule is seven plus or minus two).
- Use white space to make your document easier to read.
- Be sure the document has an identifiable beginning and end.

Additional tools and guides for help with writing clearly:

- PlainLanguage.Gov, *Federal Plain Language Guidelines*, Part 3, “Writing Your Document”
- Translation Bureau, *Clear and Effective Communication Guide*
- Communication Canada, *Successful Communication Tool Kit—Successful Written Communication*
- British Columbia Securities Commission, *Plain Language Style Guide*
- Financial Consumer Agency of Canada *Style Guide*
- Information Mapping Canada, *Information Mapping Guide*

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2. Use the visual presentation to enhance your text

The visual presentation reinforces the impact of your document. To encourage readers, make sure the appearance is appealing and inviting.

A. Overall appearance

- Keep the design simple.
- Leave white space to make the text more readable.
- Highlight your main messages by cutting non-essential information.
- Use bullets, boxes or other visual aids to summarize key information.
- Use visual aids to help readers easily find the information they need.

B. Tables and charts

- A cluttered look or unnecessary detail will make the relevant information hard to find. Use colour, boxes and summaries to draw attention to key information.
- Integrate text with graphics. Separating the two can confuse readers.
- Use 3-D graphics sparingly. They can be hard to understand.
- When drafting a table or chart, ask yourself how hard readers must work to grasp your message. Will they immediately be able to identify the key information and understand the point you are making?
- Avoid crowded pie charts.

C. Icons, photos, pictures

- Any graphic element should help you highlight your message, and it should help the reader understand what you are trying to say. If it does not do this, don't use the graphic element.
- Avoid a busy look. Simpler is better. Less is more. Icons sometimes work better than pictures or photos because they are simpler.

D. Colour

- Make your information stand out with a high contrast between text and background—for example, black text on white paper.
- Avoid layering similar colours.
- If you are printing in black and white, you can enhance the appearance by using shading, graphics, borders and coloured paper.

Additional tools and guides for help with the visual presentation

- PlainLanguage.Gov, *Federal Plain Language Guidelines*, Part 3, Section D, "Other aids to clarity"
- U.S. Securities and Exchange Commission, *A Plain English*

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- Handbook*, Chapter 7, “Designing the Document”
- Information Mapping Canada, *Information Mapping Guide*, Chapter 2, “The Integrated Graphics Principle”
 - Melissa Spore, Sally Bigwood, *One Step Ahead: Presenting Numbers, Tables, and Charts*
 - Robert Horn, *Visual Language: Global Communication for the 21st Century*

5. Test your material

Testing is an integral step in preparing clear language documents. Consumers have varying needs that change with time. Your document may have to evolve accordingly. Consistent testing is the only way to be sure that your document clearly and effectively conveys the desired message.

Testing method	Description
If funds are available, the following testing methods can provide reliable and scientific data.	
1. Focus groups—qualitative and quantitative testing (formal)	<ul style="list-style-type: none"> ▪ Focus groups enable you to test your material directly with your target audience—in the case of FCAC, Level 2 or 3 readers. This approach was used for FCAC’s <i>Qualitative Study—Less Literate Consumers’ Reaction to Education Material on Banking</i>. Focus group testing could be helpful for plain language documents. ▪ Disadvantage: expensive.
2. Protocol testing—one-on-one (formal)	<ul style="list-style-type: none"> ▪ FCAC could develop partnerships with literacy organizations that work with consumers at various literacy levels. A partner group could help FCAC test documents with its target audience. FCAC employees could serve as interviewers in one-on-one focus groups. ▪ Advantage: considerably less expensive than traditional focus groups.
If funds are limited or unavailable, the following testing methods can also provide useful feedback and data.	
1. Telephone	<ul style="list-style-type: none"> ▪ FCAC could establish a toll-free hotline

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feedback (formal)	<p>with a pre-recorded message asking callers to leave feedback on a specific document or a general topic. The information could supplement data collected through FCAC's current print and on-line feedback forms.</p> <ul style="list-style-type: none"> ▪ Advantage: An automated survey is simpler than feedback forms.
2. Co-workers (informal)	<ul style="list-style-type: none"> ▪ Test your material informally with co-workers and colleagues. They can provide an outside perspective and identify things that you might have missed. FCAC is currently testing our materials with the plain language working group.
3. Testing through existing partnerships	<ul style="list-style-type: none"> ▪ Use existing partnerships with community groups and other organizations to test plain language documentation with consumers. For example, use a community group seminar.

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Summary of Appendices (Available Upon Request)

Appendix 1

Literacy Levels

Appendix 1 outlines the five literacy levels established by the ABC Canada Literacy Foundation. It outlines the criteria for each literacy level and describes the various competencies used to determine an individual's literacy level.

Appendix 2

Plain Language Resource Comparison Table

Appendix 2 outlines the five proposed principles for FCAC and the sources used to justify and support the proposed principles. Each one of FCAC's principles is supported by numerous sources from provincial and territorial governments, federal departments and foreign countries.

Appendix 3

Detailed Source Overview

Appendix 3 is a detailed bibliography outlining all of the sources that were reviewed in creating FCAC's clear language principles.

Appendix 4

A Step-by-step Guide to Becoming a Plain English Organization

Appendix 4 is a step-by-step guide outlining the requirements to be become a plain language organization. The step-by-step guide came from *Plain English at Work*, produced by Susan Munter Communications for Australia's Department of Education, Training and Youth Affairs and the Australian National Training Authority. The document was used as a rough guide for FCAC to refer to throughout the plain language initiative.

Appendix 5

Detailed Review of Clear Language Initiatives in Canada and Abroad

Appendix 5 expands on the detailed source overview appendix by providing more thorough descriptions of the various initiatives that other countries and Canadian organizations have undertaken.

Appendix 6

Comparison of CBA and FCAC Clear Language Principles

In 2000, the Canadian Bankers Association (CBA) committed to providing banking information that customers can easily understand and use. The CBA created a set of plain language principles to help honour this commitment. Appendix 6 compares FCAC's principles to those established by the CBA to ensure consistency.