

# Paying the price for crystal balls

By Martin Cutts  
Research director, Plain Language Commission  
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## Purpose

In the light of recent research by the National Audit Office, this article:

- considers the nature of schemes that accredit the clarity of documents and points out some of the difficulties they face;
- describes how the Department for Work and Pensions, the biggest-spending UK Government department, fell foul of an explicit guarantee from the Crystal Mark accreditation scheme that failed to deliver the clarity it promised;
- wonders why the Department for Work and Pensions has continued to richly reward that failure;
- discusses a much-publicized selling point of the Crystal Mark scheme (run by Plain English Campaign Ltd), that the company pre-tests all the documents to which it gives the Crystal Mark; and
- reflects on what the national average reading age might be.

## Summary

Government rules and procedures are often complex. This complexity is likely to be reflected in documents that try to explain them to a mass audience. Government should not expect miracles from plain-language practitioners in transforming complicated laws and policies into clear documents. Of course, good authors and editors can do much to make them clear. But it would be better if legislators and policy-makers created simpler rules in the first place. Clarity should be at the heart of law-making and policy-making.

Schemes accrediting the clarity of documents like public leaflets and forms can work well and do good. However, the certifying body needs to be highly competent, in particular in matching the level of difficulty of a document to the audience's likely reading ability.

Pre-testing of public documents with typical readers remains the strongest way of assessing whether people can understand them. However, pre-testing is generally feasible only when cost and time are not crucial.

The National Audit Office (a Government spending watchdog) has found that leaflets from the Department for Work and Pensions (DWP) are often too difficult for the target readership<sup>1</sup>. These include several leaflets carrying the 'Crystal Mark' logo from a company that provides a service of accreditation for clarity, Plain English Campaign Ltd. The company claims its Crystal Mark logo is 'widely recognised as a guarantee' of clarity<sup>2</sup>. It also claims to pre-test on the public all the documents to which it gives the Crystal Mark<sup>3</sup>, though it omitted this claim when describing its working methods to the National Audit Office<sup>4</sup>. Independent public testing commissioned by the National Audit Office revealed major shortcomings in the clarity of crystal-marked documents<sup>5</sup>.

I therefore conclude that Plain English Campaign Ltd's guarantee of clarity is worthless. The company continues to publicize its guarantee and its supposed universal testing regime as major selling points of the Crystal Mark scheme, although it has known of the National Audit Office's findings since early 2006. Despite the failure of the Crystal Mark scheme to live up to its guarantee, the DWP is continuing to spend even more public money on it – the current figure is around £3,000 (US\$6,000) a month<sup>6</sup>. In January 2007 the DWP became a corporate member of Plain English Campaign Ltd at a cost of £6,000 + VAT for the first year of membership<sup>7</sup>.

I discuss the idea of a 'national average reading age' for adults. I find that this is likely to be in the range 13–15 years (just below GCSE level), based on the best available data<sup>8</sup>. Plain English Campaign Ltd believes the average British reading age to be 9.5 years<sup>9</sup>, and this underpins all its work and self-publicity. I point out that if the national average reading age were indeed 9.5 years, the average adult would be semi-literate – after 11

years of formal education and the spending of untold billions in state and private schools. I can find no worthwhile evidence of this in adult literacy research. I therefore suggest that Plain English Campaign Ltd's position is nonsense.

When topics are inherently complex, it is realistic for accreditation schemes to aim for a reading-age level of 14–15 years in the documents they edit but it will not always be achievable. If the audience is likely to include many people with weak reading skills, then a level of 12–13 may be desirable and, sometimes, achievable. Further articles will discuss what these levels represent in terms of actual pieces of text; how readability may be measured; and how to write and edit to achieve particular reading-age levels.

Although good writers and editors can achieve much, the relationship between readers and text is so problematic that guarantees of clarity are unlikely to hold water. The claims of Plain English Campaign Ltd to offer such a guarantee through the Crystal Mark scheme should be treated with deep scepticism by its customers, by the public, and by those journalists who have acted as cheerleaders for the company for many years.

## **Part 1: Difficulty of clarity-checking documents under accreditation schemes**

### **Background to accreditation schemes**

Commercial schemes exist in several countries – including the UK, Canada and New Zealand – to give plain-language accreditation to printed documents, typically those from national and local government, law firms, charities and companies. Accredited documents then display a clarity logo, like Plain Language Commission's Clear English Standard<sup>10</sup>. Similar schemes are available for websites, too.

In the UK, non-commercial bodies have occasionally taken on this kind of accreditation role: the Pensions Protection Investments Accreditation Board (PPIAB) issued a quality mark (which included clarity as one of its criteria) for certain financial documents; and the Centre for Health Information Quality vetted health documents for accuracy, relevance and clarity. Both schemes have folded because their sponsors withdrew the funding, though a new accreditation scheme for health documents is being mooted by the Government.

Usually the accrediting body charges a fee for editorial work and sometimes for use of the logo itself. The logo is meant to reassure readers that an authoritative body has checked the language and layout and found them clear. It's also meant to reflect well on the publishers by showing they are adopting best practice in getting outsiders to review their writing.

So everybody seems to win: the readers get clearer documents, the publishers get their material clarity-checked, and the accrediting body gets paid.

The 2 best-known UK schemes are our Clear English Standard and the Plain English Campaign Ltd's Crystal Mark. These compete with each other.

### **Possible drawbacks of accreditation schemes**

Everything can work out well if the editing work is done competently and if the readers have the necessary level of literacy. But these can be very big ifs, as it is easy to find accredited documents that don't seem to be clear or well written. A recent report from the UK Government's spending watchdog, the National Audit Office (NAO) found that some documents carrying Plain English Campaign's Crystal Mark logo were far too difficult for the target audience. There's more on this in Part 2.

Other unwanted effects are also possible. Readers may be cowed by seeing a clarity logo. If they can't understand the document, they may be unwilling to say so and feel more foolish than they otherwise would. Since

our scheme began in 1994, we've given the Clear English Standard to more than 11,000 documents but received fewer than 5 complaints from the public. Even when one of our major customers printed a phone number on its leaflets and specifically asked people to call if they found anything unclear, there was so little response that the phone line was shut. So either we've been doing a near-perfect job for 13 years – which would be pleasant to imagine but easy to doubt – or people are reluctant to admit they don't understand, especially when something's certified clear.

Nevertheless, we think that if an accreditation scheme is ethically run by good editors who keep up to date with research on reading, it can provide a valuable source of expertise to hard-pressed authors and publishers. That's why we started the Clear English Standard scheme, and that's why we still think it's one of the most worthwhile things we do.

### **Difficulties in running accreditation schemes**

There are difficulties in running these schemes with integrity. One of them is knowing enough about the reading abilities and prior knowledge of the likely audience. Since very few documents are tested with the public before issue (as this usually takes too long and is often too expensive), editors have to make good decisions as to what vocabulary and structures are likely to be well understood. They also need to pick up potential flaws in the layout and design.

In the case of Plain Language Commission, our editors are highly experienced and their decisions are based on sound principles (as well as the smattering of skilful guesswork that is inevitable in all editing). Also, we often get feedback through reader surveys on whether people welcomed (and thought they understood) a particular document or series. We may also use vocabulary lists and research sources to tell us what words and structures are likely to be known by people at particular levels of reading skill. Several of our team have been involved in research-based clarification work for many years. The rewriting and redesign work on forms and leaflets in which I was involved for the old Supplementary Benefits Commission was independently reviewed by researchers as long ago as 1981. That review showed that in most cases the documents were a significant improvement on those they were meant to replace<sup>11</sup>.

A second difficulty is how far an editor tries to accommodate the needs of the many people who can scarcely read and write. By this I don't mean people with serious learning difficulties, who generally need different text and layout if they are to get anything useful from a document (and we have done some of that work). I mean the 5 million or so adults in the UK who (according to Government figures) have such poor reading skill that it's of little practical use to them, even assuming they'll attempt to read a printed document at all. If that figure is to be believed – and prominent people in the field, like Alan Wells (former head of the UK's Basic Skills Agency) think it's exaggerated<sup>12</sup> – then illiteracy is more

rampant today than it was even in the 1970s when the 'Right to Read' campaign was being run.

A third difficulty is that certain words and phrases are irreducible even though their use will mean that a document will score badly on some of the mathematical tests that are sometimes used to calculate 'readability'. Words like 'invalidity', 'benefit', 'disability', 'adaptation' and 'diminishing musharaka' come in to this category, as do many medical terms that hospital patients may need to know, like 'endometriosis' or 'vasovagal syncope'. Even when average sentence length is reduced to 15 words or so, the repeated use of such 'difficult' words will produce a poor score on some of the cruder tests, like the SMOG test recommended by the Basic Skills Agency. An accreditation logo like our Clear English Standard may then be displayed on a document which, such tests may suggest, exceeds people's average reading ability.

A fourth difficulty is that there isn't just one style or standard for plain-language documents. If supposedly plain documents have been written or edited badly, fluent readers may get bogged down because wordy explanations have been included to help less literate people or because important stuff has been cut in the drive to be brief and clear. UK Governments since Jim Callaghan's in the 1970s have claimed to be simplifying everything and cutting red tape, but the scale and complexity of regulations and laws seems, on the whole, to have become far greater. This is nearly always reflected in more complex forms and leaflets for the public. In this climate, an accreditation scheme can find itself trying to clarify things that are inherently far too long and complicated. The result is palliative editing – doing the best you can to alleviate the complexities of text that expresses complex ideas.

Then there's a final difficulty, which is that not all documents badged for clarity will be equally clear to all. Some of them deal with obscure topics of little interest to most people. But if we as editorial advisers have done everything we can to make them clear for the likely readers, we feel it's reasonable to give them the Clear English Standard. In such situations, these readers will need to be highly literate, have an enquiring mind, be willing to engage with abstract ideas, and be prepared to use a dictionary occasionally. In these cases we may recommend that the publishers issue a citizen's summary, short guide or glossary to accompany the main text.

## **NAO blows the gaffe on Plain English Campaign Ltd**

All these difficulties, and the legitimacy of clarity accreditation schemes, came into focus in 2006 when the UK Government's spending watchdog, the National Audit Office (NAO), examined some of the nearly 180 leaflets being issued by the Department for Work and Pensions (DWP). The press seized on the fact that the NAO had deemed a sample of the leaflets too complex for typical readers, who it said were those on low incomes and vulnerable for other reasons such as poor literacy. But what the press

failed to report was that 5 of the 13 leaflets were badged with the Crystal Mark.

Early in 2007, the press also trumpeted a recommendation by the Public Accounts Committee, responding to the NAO report, that the DWP's leaflets should all get Crystal Mark accreditation from Plain English Campaign Ltd.

This recommendation was so bizarre that it seemed a good idea to investigate the facts behind the headlines. That's what Part 2 of this article is about.

## **Part 2: Bared teeth from the spending watchdogs**

### **Crystal-marked leaflets were 'gobbledygook', says the chairman of the Public Accounts Committee, and 'almost incomprehensible', according to independent research**

Several leaflets bearing Plain English Campaign's 'Crystal Mark' logo – which it calls a 'guarantee' of clarity – were among those savaged as 'gobbledygook' by the chairman of the House of Commons Public Accounts Committee after a National Audit Office (NAO) report branded them hard to read.

'This report reveals that gobbledygook is plaguing government communications. People may be missing out on things for which they are eligible,' said Edward Leigh MP, chairman of the committee<sup>13</sup>.

To test whether leaflets from the Department for Work and Pensions (DWP) were clear for their intended readers, independent researchers working for the NAO asked people 16 simple questions like 'How do you go about claiming jobseeker's allowance?'. The claimants completed only 4 of the 16 tasks successfully. Thirteen core leaflets tested – including 5 that had the Crystal Mark – 'required higher than average reading skills to fully understand the information', according to the NAO.

The NAO voiced astonishment that 'long leaflets did not have contents pages or indexes'. One of them was more than 60 pages long. In a crushing finding, the NAO report says: 'Our test revealed that all 13 leaflets required a reading age higher than the national average and that eight required a reading age of at least 16, or equivalent to five years of secondary schooling.'

### **'Guarantee' is still on Plain English Campaign Ltd's website**

Plain English Campaign Ltd (PEC), a business that often presents itself to journalists and the public as a pressure group, gives the Crystal Mark logo to documents it has put through its commercial editing service – and also says it will 'award' the Crystal Mark, for a fee, to documents it hasn't edited but that meet its criteria. The logo includes the words 'clarity approved by Plain English Campaign', and PEC's website states that getting the logo on a document 'guarantees' it will be 'crystal clear'. It says:

- 'The Crystal Mark has become widely recognised as a guarantee that a document has been written and designed as clearly as possible.'
- 'Nearly 1500 organisations know that only our Crystal Mark will be accepted by the public as a guarantee of a document's clarity. This is because we will not give the Crystal Mark to any document unless it can be read, understood and acted upon by the intended audience.'

These are very big claims, and PEC thus reckons to 'guarantee' the clarity of 14,000 documents.

Though PEC must have known since February 2006, when the NAO report was published, that its 'guarantee' was worthless, it has continued to include it as a main selling point of the Crystal Mark scheme. It's still on the website 18 months later (September 2007).

The DWP – the UK Government's biggest department – has admitted paying PEC £124,235 (about US\$250,000) from 2003 to December 2006, mainly for putting about 80 of its 178 leaflets through the Crystal Mark scheme. This is roughly £2,800 a month.

Apparently convinced by PEC's guarantee and its claims to pre-test on the public all crystal-marked documents, the DWP believed that its leaflets – after editing by PEC – would be appropriate even for semi-literate readers. PEC claimed in the Mail on Sunday on 3 March 2002 that the national average reading age of UK adults was 9.5 years (equivalent to only about fourth grade – 4 years of schooling – in the US). And the NAO said in 2007: '...some, including the Plain English Campaign, suggest it [the average reading age in the UK] is as low as [that of] an educated 10 year old.'

This, of course, would mean that the average Briton is functionally illiterate – a remarkable stance to take, given that most people undergo at least 11 years of formal education. PEC has never publicly substantiated these claims of mass illiteracy, and fails to answer letters querying them. But the DWP must have imagined that PEC would edit its leaflets to a standard suitable for the semi-literate member of the public that PEC thinks is a typical reader. PEC reiterated its opinion of British adults' reading skills in a fax to the NAO in 2005: 'It is frightening to realise that the average reading age in the UK is 9.5 to 10 years of age.'

I've not been able to find any worthwhile evidence for this figure in adult literacy research. The NAO itself regards the average adult as being at 'level 1' for literacy, based on Department for Education and Skills figures from 2003. (PEC knows these figures – it loftily drew the NAO's attention to them in 2005.) Level 1 equates roughly to a reading age of 13-15 years. If people with very weak reading skills are discounted, then the national average reading age is 15–16 years – roughly GCSE level (grades A\*–C).

So PEC's view of the national average reading age represents a complete misreading of the available data. By a huge margin, it is just plain wrong. PEC's editing work and self-publicity have been based on this false premise for many years. But given the national commitment to 'social inclusion' and protecting the vulnerable, any service like PEC's that 'guarantees' to turn civil-service prose into text fit for semi-literate people is likely to hook credulous customers who have targets to meet and big money to spend.

Based on desk-based readability testing, the NAO found that 4 of the DWP's 5 crystal-marked leaflets used in the research overshot PEC's own yardstick of a 9.5-year reading age by a huge margin – as much as 6.5–7.5 reading-age years. Despite this extraordinary failure – which the DWP didn't notice for several years until the NAO pointed it out – the DWP kept paying PEC large sums of money.

The NAO's researchers didn't just rely on desk-based readability testing, which is at best a rough measure. They tested the leaflets in face-to-face interviews, a much better method. And they tested them not with semi-literate people but with people who could, apparently, read. This direct testing with a representative sample of typical users revealed serious shortcomings in all the crystal-marked leaflets. Two of the 5 attracted such derisive comments from researchers and users as 'almost incomprehensible' or 'hugely complicated'.

### **Crystal-marked leaflets 'certainly too difficult for average reader', say researchers**

The NAO published all its questions and methods in a report in February 2006: 'We commissioned NOP World [a large research firm] to undertake 28 in-depth interviews with customers from the Department's four main client groups – seven respondents from each of: working age; pensioners; families with children; and disabled people in work. Respondents were selected to cover a range of social backgrounds and age groups...Each interview involved discussion around three core leaflets specific to the particular client group. To test the accessibility of information within leaflets, respondents were given a scenario and asked to provide solutions based on the information in the leaflets.'

Five of the 13 criticized leaflets bore the Crystal Mark. Most of these 5 fared badly in the face-to-face interviews and the desk-based readability testing. The NOP World report says: 'Particular comprehension problems were associated with the following leaflets' and goes on to list 5 of them, including 'Inheritance of SERPS pension' (known as SERPSL1), which carries the Crystal Mark. The DWP's customers regarded this crystal-marked leaflet as having 'the worst standard of layout and design', according to NOP World. PEC's accreditation criteria include good layout and design.

Most of the DWP's leaflets on child support fared best. None of these had the Crystal Mark. On the whole, leaflets that didn't have the Crystal Mark fared at least as well as those that did.

Four of the 5 crystal-marked leaflets were among those described by NOP World as 'certainly too difficult for the average reader in the target audiences. This finding was amply demonstrated by the difficulty experienced by participants in completing the (simple) tasks set'.

The interviews with DWP customers revealed just how difficult several of the crystal-marked leaflets were. NOP World says: 'The tasks were agreed in consultation with NAO, and were designed to cover the types of query users of the leaflets might have in reality. The interviewer read out the task to respondents, and also gave them a printed version of the question. Respondents could take as much time as they wanted to try and complete the task, and were not given any help. It should be stressed that the tasks were deliberately straightforward, and reflected one of the main information purposes of the leaflet under discussion.'

Shockingly, most of the 7 interviewees were unable to work out from crystal-marked leaflet JPS1 – on Jobseeker's Allowance (JSA) – how they should claim the benefit. They just gave up trying, said the researchers. 'At this point most said that they would visit the Jobcentre instead to find the answer to the task.'

The researchers said: 'Having reviewed the Contents, these participants finally suggested the following (incorrect) numbers as a means of contact for claiming JSA [list of numbers]... Some respondents did find page 42 (the correct page) through browsing, but were disappointed to see that there appeared to be no telephone number – just the sentence "This is an 0845 number". All missed the advice – which does not appear for a further two paragraphs, and which is not highlighted in any way – to "look in The Phone Book". To sum up the response to this task, therefore, only one respondent out of seven successfully answered the question.'

In other words, the leaflet completely failed in its primary purpose of explaining to people how they should claim the benefit.

It is surprising that the consumer-testing PEC claims to carry out on every crystal-marked leaflet did not pick up these flaws.

### **Crystal-marked leaflet 'daunting and almost incomprehensible'**

If anything, NOP World's report is even more damning about the crystal-marked leaflet 'Inheritance of SERPS pension' (SERPSL1):

- 'Even before the leaflet had been opened and studied, respondents immediately considered it daunting.'
- 'These first impressions were immediately confirmed when respondents opened the leaflet and glanced at the first few pages. In fact, some respondents had to be (gently) encouraged to continue looking at the publication within the research context. They were ready to give up at this point. "The first page is too difficult to understand. I don't know what it means. It's hugely complicated." (Pensioner).'
- 'The idea of adopting a Question and Answer format was liked, but this positive aspect was overshadowed by what many thought was almost incomprehensible text. "You'd need a solicitor, or someone expert, to translate all this." (Pensioner). ...The negative terms used for the tone of

the leaflet reflected the difficulty respondents had experienced with the text: complicated; not in simple language; [it's] for someone who's highly qualified.'

When it came to answering 2 simple questions based on the leaflet, 6 of the 7 customers failed almost completely, though 2 succeeded on one question – 'by guesswork', the NOP World report says.

It is surprising that the consumer-testing PEC claims to carry out on every crystal-marked leaflet did not pick up these flaws.

### **More muddle in crystal-marked Pension Credit leaflet**

Crystal-marked leaflet 'Pension Credit. Pick it up. It's yours' (PC1L) fared a bit better than the other 4 that had the logo. But faced with a chart apparently deemed 'crystal clear' by PEC, only one of the 7 people interviewed could successfully answer the simple task set by researchers:

- 'If a single person aged 65 or over has a weekly income of £125, and savings of £10,000, would they be likely to qualify for Pension Credit?'

The only successful respondent was a retired accountant.

On the tone of the leaflet, users described it in such negative terms as 'patronising', 'selling you something', 'complicated' and 'not in everyday language'.

It is surprising that the consumer-testing PEC claims to carry out on every crystal-marked leaflet did not pick up these flaws.

### **Users couldn't understand title of crystal-marked leaflet**

When it came to leaflet DS4JP, 'Access to Work', which gives information for disabled people, many of the 7 interviewees said the back cover, with its white text on a yellow background, was difficult to read for people with disabilities. PEC's accreditation criteria specifically refer to layout and typography. Three people could not find the answer to the researchers' simple question: 'What can Access to Work pay for?' because the relevant headings were unclear. Even the title of the leaflet wasn't immediately understood and there was no contents page.

It is surprising that the consumer-testing PEC claims to carry out on every crystal-marked leaflet did not pick up these flaws.

### **What does the National Audit Office say about all this?**

Sir John Bourn, head of the NAO (which is responsible to Parliament, not the Government), said: 'It is vital that people can rely on the accuracy of the leaflets... and it is vital that they can get hold of these leaflets and easily understand them when they do.'<sup>14</sup>

## **What does Plain English Campaign Ltd say about its own consumer-testing of crystal-marked documents?**

PEC's website (March 2007) clearly implies that PEC consumer-tests all documents submitted for the Crystal Mark. 'We do test documents on a panel of the general public or lawyers to confirm the document's clarity and legal precision.'

The website states that editing fees may be payable and that once a document 'reaches the standard', 'you can use the Crystal Mark for a one-off fee of £500. This includes...any testing that needs to be carried out'. And the website declares: 'There is no substitute for testing a document on real people.'

But under questioning from the NAO about its methods in 2005, PEC sang a different tune. It simply stated, in writing, that it desk-edited the documents the DWP provided. It didn't mention testing on the public at all. Not a single syllable of a single word.

Then, in a follow-up statement to the NAO in 2005, PEC suddenly implied that it did indeed test documents on the public before giving the Crystal Mark: 'To assess if a document is written in plain English you need to test if that document is right for its intended audience. The only way to do this is by sitting people down and testing them to see if they have understood a particular document or advert.'

So all these PEC statements on testing are crystal clear – it's just that they are contradictory. Testing a document with the public is, according to PEC, 'the only way' to assess whether a document is in plain English. There is 'no substitute for testing'. So if nothing else works, and if PEC's £500 logo fee – which is charged on top of its editing fees – 'includes any testing', then a customer will probably assume that PEC does perform some genuinely objective public testing to a reasonable level of competence. Yet PEC's working method on DWP documents, as declared to the NAO, says nothing about public testing before the Crystal Mark is given.

From all this confusion, it is hard to know what, if any, public testing PEC applied to the DWP leaflets before dubbing them 'crystal clear' and giving them its 'guarantee' of clarity. When NOP World did some proper testing through face-to-face interviews with the public, the crystal-marked leaflets generally performed feebly. PEC does not publish any information about how it conducts its supposed universal testing regime.

PEC's website goes on to list all the checks its editors supposedly make, before concluding: 'The only measure of a document's clarity is whether a document can be read, understood and acted upon on a single reading. In other words, either a document is crystal clear, or it isn't.'

And on the basis of what the NAO found, the DWP's crystal-marked documents were in the second category.

PEC's views on the utmost importance of public testing – remember, it says nothing else will do – are not some mere marketing puff. They are scattered throughout its utterances over the last 10 years whenever it's had a platform.

For example, here is PEC hectoring one of our customers about how much better their documents would be if PEC were to take over from us:

- 'Leaflets for the public need to be tested on the public before they are published. This means proper objective testing of people's understanding...The work you have done, and particularly your aims, are good. But good doesn't mean perfect, and Plain English Campaign can help you improve...Imagine the good publicity you would gain if the documents had been [sic] brought up to the notoriously tough Crystal Mark standard. If they bore the mark that is a true sign of clarity, not just a pretty logo. If they weren't just fairly clear, but crystal clear.'<sup>15</sup>

And here's PEC's website in 2001:

- 'As well as passing 35 technical tests...every document must pass our independent testing on the public. This means actually testing ordinary people's understanding of a document...'

Then there's this on PEC's website in December 1999:

- 'Through our testing of Crystal Mark documents, we talk to thousands of ordinary people every year.'

And yet more from PEC's website in 2001:

- 'We are terrified by the growing trend for people to claim something is in plain English without testing it on the public...we demand that organisations test their documents on the public before claiming they are in "plain English".'

Plus there are these comments from PEC's plainer-than-thou moral Everest in a press release in 1999:

- 'My message to organisations is crystal clear. If you don't care about customers making informed decisions, then go ahead and ignore plain English – but have the guts to say so. Just please don't say you use plain English unless you test your documents on the public before sending them to the printers.'
- 'We're sick of organisations using the words "plain English" to pass off garbage that they don't dare to put up against the Crystal Mark challenge.'
- 'When you read something that is claimed to be in "plain language" or "plain English", and then can't understand it, you are left feeling humiliated and powerless.'

Er, yes – and to whom should the 'humiliated and powerless' turn when they can't make head nor tail of PEC-accredited leaflets? Did PEC conduct 'independent testing' and 'proper objective testing' on the DWP leaflets 'before sending them to the printers'? After all, PEC says it pre-tests everything.

Presumably the DWP, like any Government department eager to get the best possible value from more than £100,000 of public money, must have verified PEC's testing regime by sitting in on the research occasionally and deliberating carefully on every one of PEC's detailed consumer-testing reports. It's what any responsible, taxpayer-funded outfit would do. We asked the DWP if it had done so. And it came back with the remarkable answer that it had never done any such thing. In fact, the DWP said it had never thought any of its leaflets would be pre-tested by PEC (letter to the author, 3 July 2007). This is clearly contrary to PEC's claim that it pre-tests everything it crystal-marks.

The PEC claim on testing is a key part of the company's 'pitch' to customers, because it asserts that PEC is constantly in touch with grass-roots opinion and literacy skills. It has given PEC a major advantage over its competitors for many years, and is likely to have attracted significant business to the company.

PEC's customers take it all on trust. In 1999 the Council of Mortgage Lenders (CML) paid for its public leaflet 'The Mortgage Code' to get the Crystal Mark. When asked why the leaflet used a word like 'intermediaries' without explaining it, and why the leaflet was called 'The Mortgage Code' when it wasn't, in fact, the Mortgage Code at all, the CML member of staff declared that everything was OK because PEC had tested it on the public first. Asked whether she'd been present during the testing or whether she'd seen the testing results, she remarked: 'No – but one assumes they [PEC] use a good research methodology. One has to take this kind of thing on trust.'<sup>16</sup>

### **Reward for Plain English Campaign Ltd: even more taxpayers' money from the DWP**

Despite the failure of the Crystal Mark 'guarantee', the DWP has since committed itself to using the scheme even more heavily. During House of Commons Public Accounts Committee hearings in June 2006, the department's top civil servant, permanent secretary Leigh Lewis, expressed total faith in PEC, his supplier:

'This is a really serious issue for us. Can I say what we have done and what we are doing? First of all, we are making it an absolute standard now that we are going to submit all of our customer leaflets for accreditation by the Plain English Campaign to seek the Crystal Mark status.'<sup>17</sup>

Given the NOP World report, which explicitly shows that many of the DWP's crystal-marked leaflets were unclear, you'd expect Mr Lewis to have mentioned this little problem to the committee. But he didn't. You'd also expect to hear a bit of contrition from him – and perhaps even from PEC. But PEC's website seems to have stayed silent about the whole affair. PEC continues to take large fees for editing work from many customers – not just the credulous DWP – on the back of its claims that the Crystal Mark is a guarantee of clarity and that it consumer-tests all crystal-marked documents.

Anyone who finds the DWP's attitude incredible may swoon at the latest news: the DWP has rewarded PEC with even more loot from the taxpayer. In January 2007 it became one of PEC's corporate members – at a cost of £6,000 + VAT for the first year. The DWP's Head of Customer Information Products says this will 'formalise our current requirements'.

### **Blunder by Public Accounts Committee**

The Public Accounts Committee has now admitted that none of its members had read the NOP World report. And no-one saw fit to tell them about it – not the NAO nor the DWP. So the committee members had absolutely no idea that the 13 leaflets that would be condemned as 'gobbledygook' by their chairman Edward Leigh MP included 5 that bore the Crystal Mark.

Which is probably why the committee's final report in January 2007 says: 'It [the DWP] should work through the existing leaflets, using simple tests such as those undertaken for the Comptroller and Auditor General's Report, until all have been tested using customers and also received a Plain English Campaign Crystal Mark.'

This, of course, will reward PEC's failure to deliver on its guarantee with at least another £100,000 of public money, given the rates the company typically charges. For the Public Accounts Committee to be deceived in this way is almost unbelievable. But Mr Leigh's office, which took 6 months to muster a coherent reply to suggestions that his committee had been hoodwinked by the DWP, doesn't see it that way. The committee clerk wrote: 'I do not agree that the PAC was "deceived" by the DWP's evidence.' (letter to the author, 18 September 2007)

## **Part 3: Lessons to be learned**

### **And so the lessons are what, exactly?**

**1** Accreditation schemes should not promise guarantees they can't deliver, and it's unethical of them to do so. Even when they've done genuine pre-testing on the documents concerned, they should be very wary of giving guarantees as there are few certainties in this field. PEC's guarantee in relation to the Crystal Mark should be immediately withdrawn from all its publicity, as it is likely to be seen and believed by existing and potential customers. PEC should immediately clear up the confusion it has created over whether it really does provide 'proper, objective testing' of documents before giving the Crystal Mark. In the 6 months since the first edition of this article was published, PEC has taken no such actions.

**2** Accreditation schemes can be helpful if the people running them are skilful at matching the level of textual difficulty to the reading ability of the likely users. But if they think the average Briton reads at 9.5 years (roughly US grade 4), as PEC does, they're likely to get the match wrong. The best available data shows a likely median of about 13–15 years (US grade 8–10). It's extraordinary that the UK's biggest Government department – with all its huge resources of staff, research facilities and money – has put its faith in an accreditation scheme that is in error by such a huge margin.

**3** When topics are inherently complex, it is realistic for accreditation schemes to aim for a reading-age level of 14–15 years but it will not always be achievable. If the audience is likely to include many people with weak reading skills, then a level of 12–13 may be desirable and, sometimes, achievable. These levels should be part of the Government's 'social inclusion' agenda, but no Government should expect authors and editors to create miracles of clarity from a morass of complex, nuanced law and policy.

**4** Accreditation schemes should consider how far a document's overall structure and typography will help the readers. For a booklet of 60+ pages to lack a contents page will always be unacceptable. Charts and tables often baffle people; they should be kept as simple as possible and, ideally, user-tested.

**5** In major projects, independent pre-testing with typical readers is likely to be worth the cost. The DWP has now started to pre-test much more; this is welcome. At Plain Language Commission we have never claimed to test documents on the public before giving the Clear English Standard. If customers want consumer-testing, they should commission it separately.

**6** Government departments should be as sceptical about grandiose claims and guarantees in the plain-language field as in any other. They should find out who'll be editing their stuff, check their credentials, and check

the research basis of their claims. In the DWP's case, a good source of information might have been the Department for Education and Skills. 'Joined-up government' requires that departments share their knowledge.

**7** The Public Accounts Committee should think very carefully before recommending that large sums of public money be spent on schemes that have not delivered on their promises. It should inform itself properly. The NAO report on DWP leaflets dropped heavy hints about the Crystal Mark scheme. Why did none of the committee members draw the obvious conclusions? Why didn't they read the NAO report properly? Why didn't they get a copy of the NOP World report?

**8** And finally: clarity should have a voice at the top table. Every proposed law, regulation and policy should be reviewed in the light of how it can be communicated in plain terms to its intended audience. In Sweden, proposed laws have to be clarity-checked and edited before they can come into effect. Clarity should be at the heart of government.

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<sup>1</sup> National Audit Office report HC797: 'Department for Work and Pensions. 'Using leaflets to communicate with the public about services and entitlements'. January 2006.

<sup>2</sup> Plain English Campaign Ltd website, [www.plainenglish.co.uk](http://www.plainenglish.co.uk)

<sup>3</sup> Plain English Campaign Ltd website, various dates.

<sup>4</sup> Fax and questionnaire to the National Audit Office from Plain English Campaign Ltd, 2005.

<sup>5</sup> NOP World Business report to the National Audit Office, 'DWP Leaflet Review', April 2005.

<sup>6</sup> DWP letter to Plain Language Commission, 9 January 2007.

<sup>7</sup> DWP letter to Plain Language Commission, 6 March 2007.

<sup>8</sup> National Literacy Trust website, [www.literacytrust.org.uk](http://www.literacytrust.org.uk), and National Audit Office letter to Plain Language Commission, 17 January 2007.

<sup>9</sup> Mail on Sunday (financial pages), 3 March 2002. Fax and questionnaire to the National Audit Office from Plain English Campaign Ltd, 2005.

<sup>10</sup> Plain Language Commission website, <http://www.clearest.co.uk>.

<sup>11</sup> Information Design Journal volume 2/1, 1981, 'An investigation into the success of redesigned supplementary benefit documents', Diane Firth.

<sup>12</sup> The Guardian (Further Education News): 'It doesn't add up', 27 July 2006.

<sup>13</sup> BBC News website, 26 January 2006.

<sup>14</sup> NAO press release 25 January 2006.

<sup>15</sup> Unpublished PEC letter to a Plain Language Commission customer (date withheld by the author of this article).

<sup>16</sup> Notes of conversation, 28 April 1999.

<sup>17</sup> Public Accounts Committee, 'Department for Work and Pensions: Using leaflets to communicate with the public about services and entitlements', 23 January 2007, HC133.