TOWARDS A CONCEPTUAL FRAMEWORK FOR IMPLEMENTING PLAIN LANGUAGE AS A STRATEGIC PRIORITY IN ORGANISATIONS

By

Nadja Green

Submitted in partial fulfilment of the requirements for the degree

MPhil COMMUNICATION MANAGEMENT

in the

FACULTY OF ECONOMIC AND MANAGEMENT SCIENCES

at the

UNIVERSITY OF PRETORIA

Supervisor:
Dr A. Leonard

Co-supervisor:
Prof A.F. Grobler

September 2019

Declaration

I declare that the dissertation, which I hereby submit for the degree MPhil (Communication Management) at the University of Pretoria, is my own work and has not previously been submitted by me for a degree at another university.

Nadja Green

September 2019

Acknowledgements

I thank God Almighty for giving me the strength and perseverance to see this study through.

My supervisor, Dr Anné Leonard. Thank you for your wisdom, guidance and encouragement.

My co-supervisor, Prof Anske Grobler. Thank you for your help in getting over the initial humps and bumps of the study.

My amazing husband, Tinus. You have supported me every step of the way. Thank you for your patience, encouragement and love.

My loving mother, Amanda. You have always believed in me and loved me unconditionally. Thank you!

The Green family. I am blessed to have such a loving and caring family. Thank you for your interest and your encouraging words of support.

My colleague and friend, Dr Sarah Slabbert. Thank you for introducing me to the exciting world of plain language.

Last, but certainly not least, I wish to thank the companies and individuals who have participated in this study.

Abstract

In South Africa, as in many countries, organisations are required by law to communicate with their customers in plain language. Plain language could also be viewed as a business requirement due to the central role that it plays in effective communication and building and maintaining stakeholder relationships.

The definition of plain language as found in the legislation provides a useful guide for plain language implementation. According to the definition, a document is in plain language if a consumer, with minimal experience, finds the content of the organisation's documents easily accessible and readily understandable.

The implementation of plain language as a strategic priority, however, remains a challenge. Organisations are making an effort to comply with the regulatory requirements of plain language, but these efforts are often haphazard and not sustainable. A need therefore exists to improve the sustainability of plain language implementation.

This qualitative research study investigated the adoption of plain language as standard business practice in organisations. In-depth, face-to-face interviews were conducted with eight organisational representatives from four short-term insurance companies and two plain language practitioners. The purpose of the interviews was to gain a better understanding of the approaches that organisations follow to implement plain language and the degree to which organisations regard plain language as a strategic priority.

As a final recommendation, the study proposed a conceptual framework for implementing plain language as a strategic priority in organisations. The framework emphasised that a strategic focus is crucial to the successful implementation of plain language.

Furthermore, plain language should be a top down initiative. Top management commitment and communication efforts ought to be aligned for successful and sustainable implementation. Lastly, plain language should be implemented consistently throughout the organisation. To achieve consistent implementation, a plan for implementation must be in place that will ensure the achievement of communication integration at all levels.

The study highlighted the potential role that the corporate communication/integrative communication function could play in the implementation of plain language as a strategic priority in organisations.

Ultimately, it is hoped that the conceptual framework will help organisations to implement plain language in a more systematic and sustainable manner.

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CHAPTER 1

Orientation and background

1.1 INTRODUCTION

Language is a powerful tool that can be used to exclude people (Cornelius, 2012:6). There are many examples in history where the ruling classes, the colonial masters or the church used language to exclude the ordinary population from information or social positions to strengthen the power position of an elite group.

In the same way, the jargon of specific professions gives power and exclusivity to that profession (Cornelius, 2012:6). Professional fields that are often littered with jargon and unclear language include medicine, health, law and the business sector.

According to Cornelius (2012:6), there is a need to make use of transparent and understandable language in order to make information accessible to all. This is a call for plain language. The purpose of language is to communicate, but the purpose of plain language is to communicate effectively (Cheek, 2010:15). Plain language puts the audience at the centre of the conversation enabling them to fully understand all that is communicated to them.

Plain language further enables consumers to use documents more quickly and efficiently, thus saving government agencies and private companies time and money by reducing errors and improving customer satisfaction (Payton, 2013; Willerton, 2015:1). Using plain language can ultimately contribute to a favourable reputation since organisations may be viewed as transparent, honest and caring toward customers.

Plain language is a democratic demand and civil right in South Africa (Stephens, 2011). The Constitution of South Africa protects a citizen's right to access to information (Fine, 2001:8). This right is only achievable if the information presented to citizens can be easily understood and readily used. There has therefore, been a definite movement towards plain language in South African legislation (Broodryk, 2013). This issue is rather complex, as illustrated in the next sub-sections.

1.1.1 South African legislation and plain language as a basic human right

Access to information is a basic human right (Constitution of the Republic of South Africa, 1996:13). However, for consumers to make sense of the information that they find in consumer documents (such as binding contracts), it should be clear and understandable, irrespective of the actual language used (any of the official languages).

Several laws and regulations, such as the National Credit Act (NCA) 34 of 2005 and the Consumer Protection Act (CPA) 68 of 2008 require the use of plain language to improve the quality and the accessibility of consumer documents (Cornelius, 2012:6).

Examples of related legislation include (i) the amended Policyholder Protection Rules for short-term and long-term insurance (2017), which requires that all communication to a customer (including advertisements) must be in plain language; (ii) the Companies Act 71 of 2008; (iii) the Short-term Insurance Act 53 of 1998; (iv) the Long-term Insurance Act 52 of 1998; (v) the Financial Advisory and Intermediary Services Act 37 of 2002; and (vi) the Code of Banking Practice.

In addition, the Financial Sector Conduct Authority (FSCA) (previously the Financial Services Board) drafted the Treating Customers Fairly (TCF) Roadmap in 2011. This Roadmap emphasises that plain language is a key factor to ensuring fairness to customers of financial services organisations. It is the fundamental right of consumers to understand all documents that they receive, and it is the responsibility of the stronger party who writes these documents to ensure that it is easily understandable (Cornelius, 2015:16).

South African organisations are therefore required by law to write their consumer documents in clear and understandable language, and could pay hefty penalties for non-compliance (Cornelius, 2015:14).

1.1.2 Plain language as a business requirement

It could be argued that plain language is not only a regulatory requirement but also a business requirement. Plain language goes hand-in-hand with effective communication, as well as building and maintaining effective stakeholder relationships (Doss, Glover, Goza and Wigginton, 2015; Mountain, 2014; Prem, 2014).

Bhasin (2017) further contends that plain language is critical if businesses want to be customer centric. Healthy customer relationships in turn sustain the business performance of organisations (Magid, 2017). Customer centricity is concerned with the needs and expectations of customers (Fader, 2012:9). Plain language is in the same way concerned the with the needs and expectations of audiences (PLAIN, 2017). This makes plain language essential for organisations who want to follow a customer centric approach.

1.1.3 Implementing plain language in South Africa

The definition of plain language, as stated in the NCA and the CPA, is a useful tool that organisations in South Africa can use to apply plain language to consumer documents and implement plain language in their organisations (Cornelius, 2015:1).

Private organisations in South Africa have also started developing their expertise in plain language (Cornelius, 2012:76). These organisations, also called plain language practitioners, offer their services to companies (mostly in the banking and insurance sector) to help them improve the clarity of their consumer and customer documents and to better implement plain language in their companies.

Plain language practitioners apply specific strategies to make complex text more accessible for the target audience. Examples of plain language practitioners in South Africa are the Plain Language Institute, Simplified, and Clarity Communications. Some law firms also offer plain language services to companies.

The practical implementation of plain language however remains a challenge (Cornelius, 2012:6). Organisations often look for quick fixes to improve their communication so that it complies with the regulatory requirements of plain language, but they are not fully committed to making plain language standard business practice, i.e. a strategic priority, in their organisation.

1.2 PROBLEM STATEMENT

In recent years there has been a steady increase of research on plain language internationally and in South Africa. Clarity, an international association promoting plain legal language, has a dedicated bi-annual journal for new research on plain language. Plain language has also been the research topic of doctoral studies, such as Cornelius (2012) and Garwood (2014).

The available research focuses mainly on the linguistic aspects of plain language as well as the tools and techniques that could be used to develop or convert documents into plain language. At the moment, there is virtually no research available on the implementation of plain language as a strategic priority in organisations.

In South Africa, plain language is a regulatory requirement for organisations such as financial institutions (Cornelius, 2012:6). Plain language could also be seen as a business requirement because of the many benefits that it holds for organisations (Mountain, 2014; Prem, 2014). However, the lack of research may limit the implementation of plain language as a strategic priority (Burt, 2009:44).

Organisations therefore require research insights on how to make plain language part of their standard business practice instead of merely seeking compliance.

1.3 GOAL AND OBJECTIVES

The overall goal of the study is to develop a conceptual framework for implementing plain language as a strategic priority in organisations.

The following objectives articulate the goal of the study:

Objective 1: To explore the strategic priorities of organisations.

Objective 2: To explore the plain language needs of customers as a key strategic stakeholder group.

Objective 3: To determine the approaches that organisations follow to implement plain language.

Objective 4: To determine the degree to which organisations regard plain language as a strategic priority.

1.4 META-THEORETICAL FRAMEWORK FOR THE STUDY

The conceptualisation of the theoretical and meta-theoretical framework of this study is illustrated in Table 1.1.

Research goal	To develop a conceptual framework for implementing plain language as a strategic priority in organisations.	
Grand theory	General systems theory	
World-view	Communication is used to build and maintain long-term relationships with internal and external stakeholders of an organisation; all communication should be clear and understandable for the target audience	
Academic disciplines	Communication management	Business management
Subfields within academic disciplines	Business and administrative communication	Strategic management
Theories from academic disciplines	Rhetorical theory	
Key concepts	**Plain language:** In the literature and South African legislation (PLAIN, 2017; National Credit Act 34 of 2005 and the Consumer Protection Act 68 of 2008) plain language is defined as an outcome and not as a "language": Communication is in plain language if a member of the target audience with minimal experience of the content can easily find what they need, understand what they find and use what they find. The definition implies that user testing is the only way to determine if communication is indeed in plain language.	**Strategic priority:** Strategic priorities are "the values that enable the organisation to achieve its goals" (Margolis, 2019a). Strategic priorities therefore define "how" an organisation will achieve its goals. Strategic priorities are action-oriented and forward-looking. Strategic priorities concentrate on the decisions that are important for the success of the organisation (Sull, Turconi, Sull and Yoder, 2017).

Table 1.1: Meta-theoretical framework

1.4.1 Grand theory

Grand theories assist researchers in understanding and explaining complex phenomena and complex organisational systems (Adams & Galanes, 2009:30). The grand theory that forms the basis of this study is the general systems theory. Ludwig von Bertalanffy is the founder of the general systems theory (Hammond, 2003:104). The theory is grounded on Aristotle's statement that "the whole is greater than the sum of the parts" (Von Bertalanffy, 1979:407).

According to the general systems theory, a system comprises subsystems that are interconnected. This means a change in one subsystem will lead to (a) change(s) in the whole system (Adams & Galanes, 2009:30-31). Newsom, Van Slyke Turk and Kruckeberg (2007:119) relate the general systems theory to an organisation and the mutually dependent relationships that an organisation has with its stakeholders. The theory could therefore be used to get a better understanding of the interconnected and complex nature of an organisation's relationships with its stakeholders and the role of communication in building and maintaining these relationships.

This study draws on the general systems theory by proposing that an organisation will improve its relationships with various stakeholders (specifically customers) if plain language becomes a strategic priority. This would only be achieved if plain language is implemented to serve stakeholders like customers in a tangible manner.

1.4.2 Academic discipline

The study draws on communication management and business management. Table 1.2 contains descriptions of these disciplines.

Theoretical field	Definition
Communication management	According to Grunig and Hunt (1984:6), communication management is the "management of communication between the organisation and its publics". Communication management comprises the "overall planning, execution and evaluation of an organisation's communication" with its internal and external stakeholders.
Business management	Greene, Adam and Ebert (1985:536-537) define business management from a strategic point of view as "a process of thinking through the current mission of the organisation, thinking through the current environmental conditions, and then combining these elements by setting forth a guide for tomorrow's decisions and results".

Table 1.2: Definitions of theoretical fields

The study considers these two disciplines from the perspective of the systems theory that assumes communication is used to build and maintain long-term relationships with internal and external stakeholders of organisations and that all communication should be clear and understandable for such target audiences.

1.4.3 Subfields within academic disciplines

This study is an exploratory study that aims to conceptualise plain language as a key concept of communication, within the sub-field of business and administrative communication, using the rhetorical theory. James (2009:34) relates plain language to the rhetorical theory, which theorises communication as the practical art of discourse. The rhetorical theory proposes that organisations use discourse (i.e. written or spoken communication) to persuade and inspire internal and external stakeholders (Craig, 1999:135; Garwood, 2014:20).

The role of plain language in discourse is to ensure that stakeholders understand the written or spoken communication and are able to use the communication to their benefit. Furthermore, the world-view that communication can be used to build and maintain relationships are emphasised through the use of plain language.

Plain language is placed in the rhetorical theory by means of the rhetorical triangle, Aristotle’s three means of persuasion and Cicero’s five canons of rhetoric.

In the business management field, the subfield of strategic management will be considered for this study. The study will specifically explore how organisations can absorb plain language as a strategic priority. The corporate communication function would play a pivotal role in this process.

The next section gives a brief synopsis of identifying strategic priorities as it is relevant for this study.

1.4.4 Synopsis of identifying strategic priorities

In order to accomplish an organisation’s vision and goals, strategic priorities should be incorporated into the core culture of an organisation, i.e. the values of the organisation (Margolis, 2019a). The reason for this being that the strategy and the core culture of an organisation are intertwined. This means that strategy should be aligned with the core culture of an organisation. In turn an organisation’s core culture must also support its strategy. Strategic priorities must also be aligned to the purpose and philosophy of the organisation (Margolis, 2019a; Sull *et al*., 2017).

Figure 1.1 illustrates how strategic priorities fit into the core culture of an organisation.

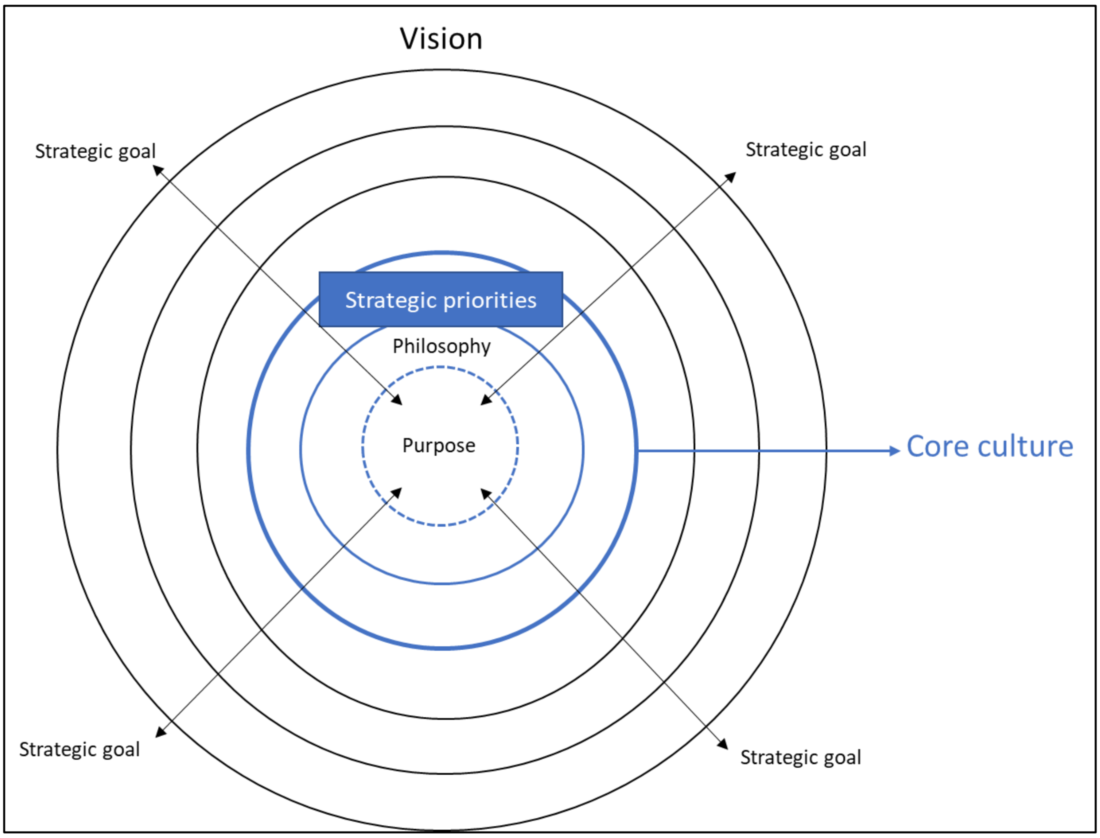

Figure 1.1: Strategic priorities as part of the core culture of an organisation (Margolis, 2019a)

According to Margolis (2019b), strategic priorities have an internal, customer and market focus and they will change over time as an organisation's strategy changes. Sull *et al.* (2017) add that strategic priorities "need to balance guidance with flexibility, counterbalance the inertia of business as usual, and unify disparate parts of the business". Identifying strategic priorities that do all of these things effectively are however a challenge.

Margolis (2019a), Sull *et al.* (2017) and Taylor (2016) identified the following best practices for identifying strategic priorities in an organisation:

- Strategic priorities must align with the mission and vision of the organisation;
- The number of strategic priorities should be limited by focusing only on the values that will most likely lead to organisational success in future;

- Strategic priorities typically require a few years to achieve;
- Strategic priorities must describe how an organisation plans to execute its business strategy;
- Strategic priorities should be limited to the values that are important to all the areas of an organisation;
- Strategic priorities must provide concrete guidance, i.e. they should clearly indicate what the organisation should focus on, what the organisation must not do and what the organisation must stop doing;
- Strategic priorities must provide a framework for how the organisation can succeed as a whole;
- To set strategic priorities, top management must solicit input feedback from all levels of management and lower employees; and
- Strategic priorities must be communicated throughout the organisation to ensure that everyone understand the direction that the organisation is going.

1.5 RESEARCH METHODOLOGY

A qualitative research orientation drives this study as it suits the overall goal and the research objectives.

The study was conducted in the financial services sector since it represents organisations that are required by law to use plain language for communication with their customers. This sector is also very competitive in terms of customer loyalty and relationships. Convenience sampling was applied to choosing the four short-term insurance companies, which participated in the study.

Two participants per organisation and two plain language practitioners were selected for interviews. The qualitative research tool, QDA Miner Lite, was used to complete the process of content analysis.

The synthesis of empirical evidence and literature culminated in the development of the conceptual framework for the implementation of plain language as a strategic priority in organisations.

1.6 IMPORTANCE OF THE STUDY

A lack of research on the strategic implementation of plain language in South Africa was the motivating factor for this study. Even though the study is exploratory of nature, the findings of the study and the proposed conceptual framework could have an important impact on the enforceability and implementation of plain language in organisations.

The study contributes to the academic fields of plain language and strategic management. Furthermore, the study has academic value in the sense that the study could spark further research in the implementation of plain language as a strategic priority in different types of organisations.

1.7 DEMARCATION OF CHAPTERS

The study comprises six chapters as set out in Table 1.3.

Chapters	Content
2 **Exploring the concept of plain language and placing it in the field of communication**	This chapter explores the concept of plain language by reviewing the history and definitions of plain language, both globally and in South Africa. The chapter concludes by relating plain language to the rhetorical field of communication.
3 **Key considerations for implementing plain language as a strategic priority in organisations**	This chapter considers plain language as an element that organisations should consider in strategic management processes. Organisational role players and requirements for the successful implementation of plain language as a strategic priority are further explored.
4 **Research methodology**	This chapter explains the research methodology followed in the study. The research design, sampling, data collection, data analysis and research ethics are discussed in detail.
5 **Results and interpretations**	This chapter contains a discussion of the research results and interpretations of the study.
6 **Conclusions and recommendations**	This chapter draws final conclusions of the research findings in relation to the research objectives, which then lead to the conceptual framework. Recommendations for further research complete this chapter.

Table 1.3: Demarcation of chapters

CHAPTER 2

Exploring the concept of plain language and placing it in the field of communication

2.1 INTRODUCTION

Chapter 2 explores the concept of plain language by looking at its origin in different parts of the world. The international and the South African definition of plain language will be addressed. The chapter will conclude by placing plain language in the rhetorical field of communication. The rhetorical triangle, Aristotle's three means of persuasion and Cicero's five canons of rhetoric will be used to position plain language as the new rhetoric of organisations.

Figure 2.1 depicts the place of this chapter in relation to the entire dissertation.

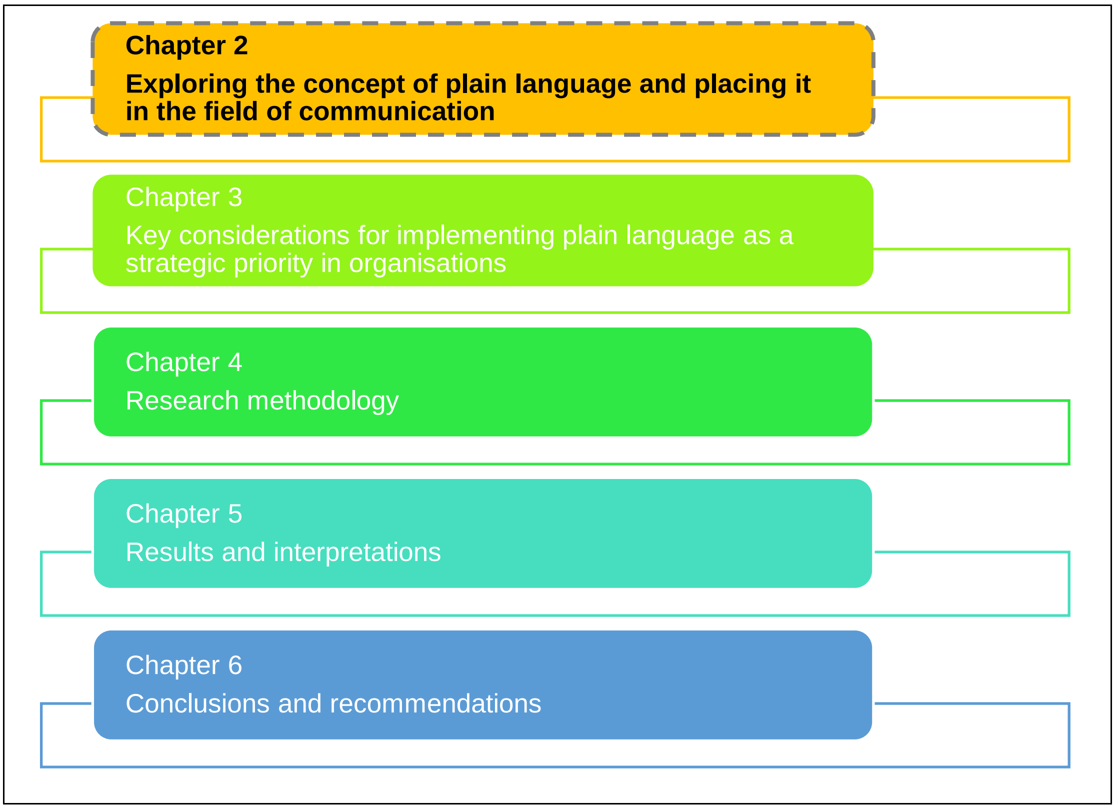

Figure 2.1: Chapter 2 in relation to the entire dissertation

Plain language is communication that an audience can understand the first time they read or hear it. A piece of writing is in plain language if the target audience can "find what they need, understand what they find, and use what they find to meet their needs" (PLAIN, 2017).

2.2 A CALL FOR PLAIN LANGUAGE IN DIFFERENT PARTS OF THE WORLD

During the second part of the 20th century, consumers in the United States of America (USA), the United Kingdom (UK), Australia and Canada became increasingly aware of their right to receive information that is useful and in plain language (Viljoen-Smook, Geldenhuys & Coetzee, 2017:19). They started voicing their concerns as well as their need for consumer documents that are easily accessible and readily understandable (Cornelius, 2012:44; Willerton, 2015:2).

At first, the concern for plain language focused mainly on the documents produced by government agencies, but now also extends to the law, health and medicine and the business sector (Willerton, 2015:2). In the past decade, a drive for clear and understandable communication was also taken up by many non-English speaking countries, such as Mexico, Portugal, the Scandinavian countries, Japan and the Philippines.

The Plain Language Movements (PLMs) in the USA, the UK, Australia and Canada have had the biggest impact on changes in legislation and the way organisations communicate with customers. The driving forces behind these PLMs will be discussed in the sections that follow.

2.2.1 Plain language in the United States of America

The USA has a long history of interest in clear government communication (Locke, 2004). After WWII federal employees such as Jim Minor started advocating the use of plain language in government documents. John O'Hayre, an employee of the Bureau of Land Management, wrote a book called

Gobbledygook Has Gotta Go. In the 1960s, fervent consumer activism and increased government paperwork brought attention to clear and understandable writing (Willerton, 2015:3). A PLM started in the USA toward the simplification of consumer documents (Cornelius, 2012:45).

In 1972, President Nixon ordered that the Federal Register be written in “layman’s terms” (Locke, 2004). This action gave early momentum to the PLM. Shortly thereafter, in 1973, Citibank revised a bill in plain language (Cornelius, 2012:45). The bank was widely acclaimed for this action and its customer relationships improved. In 1977, New York became the first state to apply plain language regulation.

One of the largest driving forces of the movement was President Carter’s executive orders. Executive order 12044 of 1978 intended to make government regulations “cost-effective and easy to understand by those who were required to comply with them” (Locke, 2004). An important result of this order was the simplification of tax forms by the Internal Revenue Service (IRS) (Cornelius, 2012:46). The Department of Education further funded a research and development contract, called the Document Design Project, which helped many federal agencies to write plain language regulations as well as other customer and consumer documents (Locke, 2004).

President Carter’s executive orders were revoked by President Reagan during the 1980s (Locke, 2004). It became the individual decision of each federal agency whether they want to focus on plain language or not. This led to the PLM losing some of its momentum (Locke, 2004). However, federal employees that could see the benefits of plain language continued their efforts in making consumer documents more understandable (Schriver, 1997:28). The Social Security Administration, for example, revised several of their notices in plain language (Locke, 2004).

During this time, a number of lawyers also started showing interest and understanding in the benefits of plain language. One of the leading advocates of plain language was Professor Joseph Kimble of the Thomas Cooley Law School (Locke, 2004). He still writes for the longest running column on legal writing, namely the Plain Language Column of the Michigan Bar Journal.

In 1998, President Clinton revived plain language through a presidential memorandum he issued (Locke, 2004; Willerton, 2015:8). The memorandum required that from 1 January 1999 all new regulations be written in plain language (Locke, 2004). The memorandum was accompanied with the following message from President Clinton:

> "By using plain language, we send a clear message about what the government is doing, what it requires, and what services it offers... Plain language documents have logical organization; common, everyday words, except for necessary technical terms; 'you' and other pronouns; the active voice; and short sentences."

The message was directed toward regulation writers and government attorneys, but the President also encouraged the business sector to write their consumer documents in plain language (Locke, 2004). In addition, Vice President Al Gore coined the iconic statement "Plain language is a civil right" during this time (Willerton, 2015:8).

During the 1990s, the Veterans Benefit Administration, who was renowned for their incomprehensible use of language in documents, started the Reader-Focused Writing (RFW) initiative (Cornelius, 2012:48). Through the initiative more than 8000 employees were trained on how to improve their writing to make it clearer for the reader. Reader experiences were tested after the employees started applying what they had learned during their training. The results were positive - veterans believed that the RFW initiative was successful in improving the administration's communication (Cornelius, 2012:48). The initiative also boosted employee morale which led to higher levels of employee satisfaction.

The Plain Language Action and Information Network (PLAIN) was established in the mid-1990s (Cornelius, 2012:49; Willerton, 2015:7). This organisation supports the notion of clear and understandable consumer documents and information. It also offers plain language training to federal agencies (Willerton, 2015:8).

PLAIN developed the Federal Plain Language Guidelines which is revised on an ongoing basis. Another plain language resource that was developed during this time is the SEC Plain English Handbook (Locke, 2004). The Center for Plain Language, a non-profit organisation, was founded in 2003 with the mission of getting the government and the business sector to communicate more clearly to the people they serve (Cheek, 2011:52).

President Obama signed the Plain Writing Act of 2010 on 13 October 2010 (Cornelius, 2012:50). The Act states that all government communication in the USA must be clear and understandable to citizens. The aim of the Plain Writing Act is furthermore to improve the effectiveness and accountability of government departments through clear and understandable communication (Cornelius, 2012:50). Government departments must submit annual reports showing their compliance with the Act (Willerton, 2015:100).

The Act describes plain language as “writing that the intended audience can readily understand and use because that writing is clear, concise, well-organized, and follows other best practices of plain writing” (United States of America, 2010:1). Plain Language remains an important focus for the government and business sector in America due to the driving force of the Plain Writing Act of 2010 as well as organisations such as PLAIN and the Center for Plain Language.

2.2.2 Plain language in the United Kingdom

In 1973, the Committee on the Preparation of Legislation (also known as the Renton Committee) was established in the UK to investigate how greater simplicity and clarity can be achieved in legislative documents (Renton, 2006:5). The Committee released the Renton Report on 7 May 1975. This report gives examples of the unclear language found in laws and regulations and recommended that these documents be improved (Cornelius, 2012:51). Also, during the 1970s, the National Consumer Council was founded. The Council requested that all law professionals make use of plain language and developed guidelines and handbooks such as *Gobbledygook* (1980), *Plain Words for Consumers* (1984), *Plain English for Lawyers* (1984), *Making Good Solicitors* (1989) and *Plain Language – Plain Law* (1990) (Cornelius, 2012:51-52).

The Plain English Campaign started protesting misleading public communication in 1979 (Plain English Campaign, 2017). The Campaign worked closely with the National Consumer Council and used the term "Plain English" in its lobbying to improve access to social services. Cassie Maher and Martin Cutts, the founders of the Plain English Campaign, focused their attention on government communication (Cornelius, 2012:53). They demonstrated in front of government offices, dressed up in costumes, and gave public “gobbledygook awards” to the worst examples of consumer documents that were not clear or easily understandable. The Campaign gained the support of important government officials such as the Prime Minister at the time, Margaret Thatcher (Cornelius, 2012:52).

In 1982, the UK government issued a policy document encouraging government departments to improve the layout and design of forms as well as to eliminate forms that are unnecessary (Cornelius, 2012:52). The departments also had to report on their progress annually. Margaret Thatcher was a major driving force behind this initiative. The policy document led to more than 100 000 forms being eliminated, reviewed or redeveloped (Cornelius, 2012:52).

Clarity, an international association that promotes plain legal language, was started by John Walton, a solicitor and lawyer, in 1983 (Clarity International, 2017). Clarity gives its members access to plain language resources such as legislation and journal articles. Together with the Law Society (of England and

Wales) Clarity wrote a book in 1990, namely *Clarity for Lawyers* (Cornelius, 2012:53). Organisations such as Clarity are increasingly motivating the public as well as the private sector to write or rewrite legislation and regulation in plain language (Samuels, 2006:7).

In 1995, the rewriting of taxation legislation led to major developments in the field of plain language in England. On 28 November 1995, the British Minister of Finance announced a three-year plan to improve the clarity of taxation legislation (Cornelius, 2012:54). This led to a number of new taxation laws being approved and implemented during the first five years of the 21st century.

Furthermore, a new design for the layout of all legislation in the UK was proposed in 2011. In many cases, explanatory comments are used to give accompanying explanations and working examples of legislation (Samuels, 2006:7). In 1998 and 1999, the Civil Procedure Rules of England and Wales was written in plain language with the aim of lowering the cost and length of civil lawsuits. During this process, Latin words were replaced with more well-known words (Cornelius, 2012:54).

The European Union (EU) also played an important role in promoting the use of plain language in the UK (Cornelius, 2012:55). The EU’s directive regarding unreasonable terms and conditions in consumer agreements took effect on 1 July 1995. Furthermore, the Unfair Terms in Consumer Contracts Regulations of 1999 state that all standard terms in contracts must be in plain language (Willerton, 2015:10). The statutory instrument furthermore asserts that unreasonable or unfair terms are not binding to the consumer, and that any unclear terms will be in favour of the consumer (Cornelius, 2012:55). These regulations led to consumer agreements being written in simpler language since 1995. The EU launched the Clear Writing Campaign in 2010 and also published a booklet, *How to Write Clearly*, in all 23 official languages of the EU (Willerton, 2015:10).

2.2.3 Plain language in Australia

A PLM started in Australia in 1976 when the National Road Motorists Association (NRMA) released their *Plain English Car Insurance Policy* (Schriver, 1997:30; Willerton, 2015:9). Unlike the USA and the UK, the driving force behind the PLM first came from the public and private sector and not from the government (Cornelius, 2012:57). Some government institutions, however, became aware of the economic benefits of consumer documents that are clear and easily understandable. An effort was made during the 1970s to improve the readability of federal legislation (Cornelius, 2012:58). Policy was introduced, in a number of states, to ensure that legislation was written in plain language (Willerton, 2015:10). Even though there were no formal plain language policies in the other states, there was still significant awareness of the benefits of using plain language.

During this time, the Parliamentary Counsel Committee also focused on the drafting of legislation in plain language (Cornelius, 2012:59). The Victoria Law Reform Commission was founded in the 1980s (Cornelius, 2012:57). In June 1987, the Commission published 15 recommendations on how government departments and agencies can improve the clarity of legislation, regulation and other consumer documents. One of the recommendations was the establishment of a Plain English unit to rewrite existing government documents. According to Schriver (1997:30), these recommendations led to cost savings for the departments and agencies as well as a decrease in lawsuits showing how plain language has a positive effect on the legal domain.

According to Asprey (2010:39), several pieces of legislation were revised between 1992 and 1999 by the Australian Office of Parliamentary Counsel. New legislation was also drafted in plain language (Cornelius, 2012:59). An example is the Queensland Land Titles Act of 1994. The Industrial Relations Reform Act also took effect in 1994. Article 30B of this law requires that “the Commission must ensure that all its written decisions are written in plain English and structured in a way that is easy to understand” (Queensland Government, 1994:18).

In 1993, two projects, namely the Corporations Law Simplification Program and the Tax Law Improvement Project, were launched in Australia with the main goal of simplifying the Commonwealth legislation (Asprey, 2010:36). Plain language practitioners were part of the teams who worked on the two projects. The Corporations Law was shortened by 13 000 words (Cornelius, 2012:59). Significant changes were also made to the Income Tax Assessment Act of 1936. Improvements were made to its structure allowing the reader to better understand and use the information found in the Act (Cornelius, 2012:59).

The Centre for Plain Legal Language was founded in 1990 by the Law Foundation of New South Wales (NSW) and the University of Sydney's Law Faculty (Cornelius, 2012:60). The main goal of the Centre was to conduct research on the economic benefits of documents in plain language. The Centre also published regular plain language columns, supported the drafting of documents and legislation in plain English, as well as offered training to lawyers and other plain language practitioners (Asprey, 2010:41; Willerton, 2015:10).

Even though the Centre for Plain Legal Language had to close its doors in 1997, the awareness it created for plain language carries on in the legal, private and government sectors of Australia. The Communication Research Institute of Australia took over some of the work of the Centre. The Institute played an important role in revising Tax Form S, Telecom Australia's phone bills as well as the Australian Bureau of Statistics' data capturing forms in plain language (Cornelius, 2012:61).

Presently, Australia does not have any formal plain language laws or regulations in place (Cornelius, 2012:57; James. 2006:2). At the 2009 PLAIN conference, an appeal was made to the Australian government to set plain language standards for the country's private, public and government sector. James (2006:5) believes that the future holds even more positive developments for Australia in terms of plain language.

2.2.4 Plain language in Canada

According to Schriver (1997:31), the Canadian PLM originated from the initiatives of government agencies and private institutions, rather than from citizen activism. The Alberta Law Reform Institute supported plain language in the law since 1968 (Willerton, 2015:9). From 1973 to 1992, the Canadian Legal Information Centre (CLIC) focused on the promotion of plain language in legal information (Willerton, 2015:9).

In 1988, the CLIC established the Plain Language Centre in Toronto. The Centre functions as a catalyst for plain language in Canada by creating awareness thereof as well as offering plain language services to public and private organisations (Cornelius, 2012:62). In 1976, the Canadian Legislative Drafting Conventions came to light. These Conventions highlighted the most important principles of drafting legislation in plain language (Asprey, 2010:7).

In 1979, the Bank of Nova Scotia made use of the services of law expert, Robert Dick, to redesign and rewrite the bank's loan application forms (Cornelius, 2012:62). Other financial institutions also started joining the PLM. The insurance company, Clarica, started a plain language programme in 1999 (Asprey, 2010:8). The programme comprised the redrafting of all existing insurance policies and other relevant documents in plain language.

In 2000, all members of the Canadian Bankers Association announced that they were committed to delivering information that is clear and readily understandable to their clients. Also, in 2000, the Canadian Securities Administration required that the booklets of investment firms be written in plain language. A year later, the Canadian government made four models of loan exposure documents in plain language available. These models were examples by which financial institutions could write their own documents (Cornelius, 2012:68).

The Canadian government's communication policy requires government agencies to communicate in plain language (Cornelius, 2012:68). Readability and usability tests were performed on certain laws and regulations in the 1990s. During this time, the government also accepted many laws that encouraged the use of plain language in documents (for example the Bank Act of 1991 and the Agriculture and Agri-Food Administrative Monetary Penalties Act of 1995).

Cheryl Stephens and Kate Harrison founded the Plain Language Network in 1993 (Stephens, 2011). This non-profit organisation offers a platform for plain language practitioners and other stakeholders to discuss ideas and share resources on plain language (Cornelius, 2012:64). The Plain Language Network together with Clarity (in the UK) and the Center for Plain Language (in the USA) are at the forefront of leading the international PLM (Stephens, 2011).

2.3 INTERNATIONAL DEFINITIONS OF PLAIN LANGUAGE

While the previous sections illustrated the long history of plain language and its development, no standardised definition of plain language was proposed by the countries. According to Willerton (2015:1), people use the terms “plain language”, “plain English” and “plain writing” interchangeably. Plain language is, however, according to Willerton (2015:1), the most inclusive of these terms.

Plain language can mean anything from simplifying complex sentences to rewriting documents in full (Viljoen-Smook *et al*., 2017:19). At the moment, there is no universal definition of the term plain language. However, in 2018, the Plain Language Working Group has put forward draft international standards for plain language, which includes a definition (Balmford, Cheek, Kleimann, Harris & Schriver, 2018). At the time of the research, the standards including the definition were still under review.

Many international definitions of plain language resulted from the different PLMs around the world (Viljoen-Smook *et al.,* 2017:19). The Plain Language Working Group (consisting of experts from the US, the UK, South Africa, New Zealand, Canada, Sweden, Portugal, Mexico, Hong Kong, Belgium and Australia) analysed and divided the definitions according to three approaches toward plain language, namely the numerical or formula-based approach, the elements-focused approach and the outcomes-focused approach (Cheek, 2010:5; Cornelius, 2015:4).

Cheek (2010:5) recognises that all three approaches play a part in achieving clear communication as well as determining whether a communication is in plain language. The three approaches to plain language, as well as their strengths and weaknesses, will now be discussed.

2.3.1 Numerical or formula-based approach

The numerical or formula-based approach to plain language focuses on specific elements that determine the readability of a text (Cheek, 2010:5; Viljoen-Smook *et al*., 2017:19). These elements include word, sentence and paragraph lengths and the number of syllables in a word. Mathematical formulas, such as the Flesch-Kincaid Index, the Coleman-Liau Index, the Flesch Reading Ease test, and the Gunning Fog Index, are applied to texts to determine comprehensibility and readability (Cheek, 2010:5; Viljoen-Smook *et al*., 2017:20). The formula-based approach is also linked to a person's reading ability as well as their level of education (Cornelius, 2012:67).

Table 2.1 describes the strengths and weaknesses of the numerical or formula-based approach to plain language.

Strengths	Weaknesses
The formulas are easy to apply (it is often in the form of computer programmes, such as Microsoft Office Word and Outlook).	The formulas are simplistic and only take a few elements into account.
The formulas can be administered without having any writing expertise or experience.	The formulas do not give a definitive answer whether a document is easy to read.
The formulas offer objective results for people to decide if a document is comprehensible and readable.	The formulas can give misleading results because they have been developed for English first language speakers.
The formulas can indicate if a document is difficult to read.	The formulas do not provide recommendations or guidance on how to improve the text.
	The formulas only recognise some differences between the reader groups such as level of education.

Table 2.1: Strengths and weaknesses of the numerical or formula-based approach to plain language (Cheek, 2010:5)

2.3.2 Elements-focused approach

The elements-focused approach to plain language is based on the different text production techniques used to achieve clarity, readability and comprehensibility in documents (Cheek, 2010:6; Viljoen-Smook *et al.*, 2017:21). These techniques are often in the form of guidelines and include:

- Structure: Arrangement of information and sentence structure.
- Design: The use of white space, colour, typeface and font size.
- Content: The information must be helpful and interesting for the reader.
- Vocabulary: The choice of words.

The strengths and weaknesses of the elements-focused approach to plain language is shown in Table 2.2.

Strengths	Weaknesses
It is much broader than the numerical or formula-based approach.	It is difficult to use and takes longer to implement.
It is more probable to reflect a text's readability accurately.	It requires writing expertise as well as good judgement.
It provides guidance on how to improve writing.	It does not give a numerical indication of success.
It recognises the differences between reader groups and adapts accordingly.	It is not easy to achieve consensus on which text production techniques to use to achieve the best results.

Table 2.2: Strengths and weaknesses of the elements-focused approach to plain language (Cheek, 2010:6)

2.3.3 Outcome-based approach

The outcomes-based approach determines how well a reader can understand as well as use a document (Cheek, 2010:6; Viljoen-Smook *et al*., 2017:22). Furthermore, the focus is not only on linguistic aspects but also on the visual design elements that make a document more readable. This approach also promotes the idea of testing a document's usability (Cheek, 2010:4).

According to the outcomes-based approach, a document is in plain language when readers easily find what they need, readily understand what they find and act appropriately based on that understanding (Viljoen-Smook *et al*., 2017:22).

Graves and Graves (2011:71) add to the idea of focusing on the target audience when writing documents with the following quote: "At its heart, plain language involves an ethical relationship between the reader and the writer. As a writer, you must want to communicate with your audience clearly".

The strengths and weaknesses of the outcome-based approach to plain language are illustrated in Table 2.3.

Strengths	Weaknesses
It is the most likely approach to produce readable documents.	It is difficult to use this approach.
It can produce statistical results, in some instances.	It takes time to measure the outcomes of the approach.
It encourages tailoring documents to the needs of the different reader groups.	It is often impractical to test.
Testing can provide specific recommendations on how to improve a document.	

Table 2.3: Strengths and weaknesses of the outcome-based approach to plain language (Cheek, 2010:6)

The outcome-based approach views plain language as more than just clear and understandable language. According to Balmford (n.d.), the term "plain language" is inaccurate because it places too much attention on language, i.e. words and sentences. The reality is that writing or rewriting a document in plain language involves rethinking the entire document (its structure, design, content and vocabulary) while, at the same time, rigorously focusing on the purpose of the communication and the target audience. Balmford (n.d.) states that the outcome-based approach to plain language will lead to successful and effective communication.

2.4 THE HISTORY OF PLAIN LANGUAGE IN SOUTH AFRICA

According to Viljoen and Nienaber (2001:9), plain language was not a priority in South Africa before 1994. In the 20th century, the acceptability of South Africa's law system was questioned due to the discriminatory nature of the country's Apartheid regulation. Language was also a major contributing factor to the 1976 Soweto uprising (Cornelius, 2012:74).

Before 1994, only Afrikaans and English were recognised as official languages in South Africa. This policy led to the majority of the South African population, who were not proficient in Afrikaans or English, being excluded from social mobility, good quality education and economic freedom. The language policy also led to citizens not having access to the law, because the country's legislation was only written in Afrikaans and English (Cornelius, 2012:74). The exclusion was even further escalated since South Africa's legislation was not in plain language (Viljoen & Nienaber, 2001:9).

When South Africa became a democracy in 1994, the language policy was reconsidered. All 11 languages of South Africa were now equal (Cornelius, 2012:75). According to Fine (2001:8), South Africa's interim Constitution of 1993 and new Constitution of 1996 created the opportunity to develop a plain language culture in South Africa.

The South African government enlisted the help of international plain language experts to amend the Constitution. The drafts of the new Constitution were also taken through a rigorous process of user testing and public participation (Fine, 2001:8). Plain language principles were also applied to other legislation, such as the Labour Relations Act 66 of 1995 and the Mine Health and Safety Act 29 of 1996.

The changes made to these Acts were significantly different from the established conventions that characterises legislation, e.g. important information was placed at the beginning of the document and definitions at the end, defined words were shown in cursive and information that is less important was put in appendices (Viljoen & Nienaber, 2001:11). This conducive environment also encouraged the use of plain language in public sector forms and documents as well as legal resource information used for conveying public and human rights information (Fine, 2001:8).

The South African government, under the leadership of the European Union's Parliamentary Support Programme, started the Parliamentary Plain Language Project in 2001 (Cornelius, 2012:76). The aim of the project was to develop guidelines for government officials to help them draft documents, especially for Parliament, in plain language. The project identified a number of needs regarding the implementation of plain language, including (Asprey, 2010:28):

- developing training manuals and programmes for Parliament as well as lawmakers in all nine provinces;
- developing refresher courses and a mentoring system;
- compiling an electronic glossary of plain language definitions; and
- making available plain language editing packages in all the official languages.

The non-governmental sector of South Africa played a leading role in developing public and human rights information in plain language (Fine, 2001:8). The topics covered include HIV/AIDS, women rights and gender issues, socio-economic rights and voter education. The public sector of South Africa has become increasingly aware of the benefits of using more understandable and clear language in consumer documents (Cornelius, 2012:76). These benefits include a decrease in administration costs as well as fewer complaints and queries regarding consumers' inability to understand certain documents. Management will also be better equipped to make decisions when documents are shorter as well as clearer.

2.5 A SOUTH AFRICAN DEFINITION OF PLAIN LANGUAGE

The use of plain language is a law in South Africa, and it is therefore very important that companies and plain language practitioners understand the definition of plain language. The NCA was the first South African law to include a definition of plain language (Broodryk, 2013). The CPA has a very similar definition of plain language (Gordon, 2011).

Plain language is defined in the NCA (Section 22) and the CPA (Section 64) as: "*For the purposes of this Act, a notice, document or visual representation is in plain language if it is reasonable to conclude that an ordinary consumer of the class of persons for whom the notice, document or visual representation is intended, with average literacy skills and minimal experience as a consumer of the relevant goods or services, could be expected to understand the content, significance and importance of the notice, document or visual representation without undue effort, having regard to:*

- *The context, comprehensiveness and consistency of the notice, document or visual representation;*
- *The organisation, form and style of the notice, document or visual representation;*
- *The vocabulary, usage and sentence structure of the notice, document or visual representation; and*
- *The use of any illustrations, examples, headings or other aids to reading and understanding*".

This definition of plain language displays elements of both the outcome-based approach and elements-focused approach to plain language. The first half of the definition focuses on the target audience, that is the reader of the document (Gordon, 2011). The reader is classified as an 'ordinary customer' who has 'minimal experience' in the relevant product or service. Furthermore, a document is in plain language if the reader can understand its 'content' as well as recognise its 'significance and importance'. Lastly, the reader must be able to understand the document without 'undue effort'.

The second part of the definition talks more about the text (Gordon, 2011). According to the above definition, the following should be focused on when writing a document in plain language:

- The use of the document;
- The accuracy and comprehensiveness of the document;
- The sentence structure in the document;
- The terminology and jargon used in the document; and

- The use of reading aids such as headings and examples in the document.

A customer-centric perspective is central to the definition of plain language in the NPA and the CPA. A document is in plain language if it is clear and understandable for the target audience. According to Gordon (2011), "the fact that the definition opens with an explanation of the reader, and not with the text, tells us about how plain language should be measured. It tells us that we need to do consumer testing (user testing) of our documents to ensure that readers understand them". Slabbert and Green (2018:35) add that the definition of plain language in the South African legislation is not language specific. The definition therefore applies to South African consumers who speak different languages.

Keeping the international and South African development and definitions of plain language in mind, the next section will aim to place plain language in the field of communication.

2.6 PLACING PLAIN LANGUAGE IN THE FIELD OF COMMUNICATION

James (2009:33) noted that communication is not yet a coherent field with a common intellectual base. The field consists of hundreds of unrelated communication theories unable to fit into one grand theoretical overview (Craig, 1999:135; James, 2009:33). In an attempt to make sense of this, Craig (1999:135) identified seven communication traditions into which most communication theories are grounded. The seven major communication traditions are: socio-psychological, cybernetic, rhetorical, semiotic, socio-cultural, critical and phenomenological.

2.6.1 Craig's seven communication traditions

In order to place plain language in the field of communication, a closer look will now be taken at Craig's seven communication traditions. Each tradition is briefly discussed and the most appropriate tradition for plain language is selected.

2.6.1.1 Socio-psychological tradition

Craig (1999:142-143) theorises communication under the socio-psychological tradition as interpersonal interaction, expression and influence. According to Griffin (2015:38-39), scholars of this tradition believe that communication can be achieved through systematic and careful observation. The socio-psychological tradition emphasises cause-and-effect relationships as a way to predict the way that people communicate.

2.6.1.2 Cybernetic tradition

Griffin (2015:39) defines cybernetics as “the study of information processing, feedback, and control in communication systems”. The cybernetic tradition therefore views communication as a system of information processing (Craig, 1999:141). According to this tradition, communication does not take place in a vacuum; it is embedded in a system of information processing. The ultimate goal of the cybernetic tradition is to get the most amount of information across with the least amount of interference.

2.6.1.3 Phenomenological tradition

According to Griffin (2015:44-45), phenomenology is a philosophical term relating to the intentional analysis of everyday experiences from the perspective of the person who is living it. The phenomenological tradition is theorised by Craig (1999:138) as “communication as the experience of otherness” and by Griffin (2015:44) as “the experiences of self and others through dialogue”. The tradition focuses on establishing and sustaining authentic human relationships through the direct experiences of others.

2.6.1.4 Semiotic tradition

Semiotics is the study of verbal and non-verbal signs (Griffin, 2015:41). The semiotic tradition views communication as the process of sharing meaning through signs and symbols (Craig, 1999:136-137; Griffin, 2015:41-42). Scholars of this tradition believe that meaning resides in people and that gaps between people's subjective realities can be bridged through a shared sign and symbol (i.e. language) system.

2.6.1.5 Socio-cultural tradition

According to Craig (1999:144), the socio-cultural tradition views communication as the production and reproduction of social order and culture. This means that scholars of this tradition see communication as the creation and enactment of social reality (Griffin, 2015:43-44). Social reality is shaped by the interaction processes and the language that people speak.

2.6.1.6 Critical tradition

According to Craig (1999:146-147), the critical tradition views communication as discursive reflection. Griffin (2015:44) calls it "communication as a reflective challenge of unjust discourse". Scholars of this tradition believe that it is possible to restore social justice through communication practices that allow and enable critical reflection.

2.6.1.7 Rhetorical tradition

Craig (1999:135) theorises communication under the rhetorical tradition as "the practical art of discourse". Griffin (2015:41) states that the rhetorical tradition emphasises the importance of language to engage people and to motivate them towards a specific action. Historically, the rhetorical tradition has focused on public speaking and delivery, but in modern times the focus had also moved towards the power of persuasion through the written word.

2.6.2 Rhetoric as the most appropriate tradition for plain language

At first glance there seems to three traditions that could be appropriate for plain language, namely the cybernetic tradition, the semiotic tradition and the rhetorical tradition.

The cybernetic tradition views communication as a system of information processing. The goal of the tradition is effective communication. The semiotic tradition believes that meaning is created through a shared language system. The rhetorical theory focuses on how communication is used to engage with people and motivate them towards a specific action (Griffin, 2015:39-41).

Even though the cybernetic and semiotic tradition is concerned with effective communication, James (2009:33-35) deemed the rhetorical tradition to be the most appropriate and the most useful for plain language. At their cores the rhetorical tradition and plain language share a common context and they have similar elements and methods.

According to Blankenship and Jory (2016), rhetoric is built on the notion of "language matters". Rhetoric is a powerful tool for understanding the impact that language has on society. Rhetoric and plain language thus share a common context, i.e. focusing on the impact that language (the written or spoken word) has on target audiences and whether this communication satisfies the needs of that particular target audience (James, 2009:33).

James (2009:34) states that rhetoric and plain language have similar elements and methods. According to Garwood (2014:21), there are clear plain language equivalents for the three main elements of rhetoric. In addition, there is also a clear link between the principles of plain language and the three means of persuasion related to rhetoric. According to James (2009:33), "for the most part, plain language today applies to the same scenarios Aristotle identified over two thousand years ago". The definition of plain language in the South African legislation can also be used to compare the rhetorical tradition to plain language.

The similarities between rhetoric and plain language mentioned above will be further discussed in section 2.7, but first a closer look will be taken at the history and definitions of rhetoric.

2.6.2.1 A brief history of rhetoric

Rhetoric has a long and varied history that started with the ancient Greek sophists (Craig, 1999:135). In ancient Greece, in the early days of democracy, any citizen could debate for any reason in public (James, 2009:33). A man's success and influence depended on his rhetorical ability (McKay & McKay, 2010). Therefore, small schools devoted to the teaching of persuasive public speaking were established.

The first of these schools started in the 5th century B.C., and the teachers were called sophists. Sophists studied the notion of rhetoric to provide better training in speaking and debating to their pupils. According to McKay and McKay (2010), sophists had a significant influence on the study, as well as the teaching, of rhetoric.

The greatest work on rhetoric was penned by Aristotle, a scholar of Plato, approximately 350 B.C. (De Wet, 2010:29). The work was called *The Art of Rhetoric* and consisted of three books:

- Book I focuses on the speaker. It introduces the main purpose and working definition of rhetoric as well as discusses the types of rhetoric and the contexts associated with them.
- Book II looks at the audience and gives advice on different types of speeches. It discusses three means of persuasion (ethos, logos and pathos) that can be used when engaging with the audience.
- Book III considers the subject and looks at the elements of a message, namely the style (word choice, use of metaphors and sentence structure) and the arrangement.

The Art of Rhetoric is still considered a key resource in rhetorical studies as it comprises definitions and explanations that continue to influence rhetorical approaches (Garwood, 2014:20).

Rhetoric was slow to develop in ancient Rome, and only took off when the empire conquered Greece and was influenced by its traditions (McKay & McKay, 2010). The Romans also deviated on some of the Greek traditions, such as depending more on stylistic flourishes, interesting stories and metaphors instead of logical and scientific reasoning. Cicero, a lawyer, was the first rhetorician in Rome. He wrote a number of dissertations on the topic of rhetoric, including *On Invention, On Oration* and *Topics.* Cicero developed the five canons of rhetoric in his writings. The five canons of rhetoric provide a guide on how to create a powerful speech. The five canons are invention, arrangement, style, memory and delivery.

In the 18th and 19th century, entire departments at European and American universities were devoted to the study of rhetoric (McKay & McKay, 2010). The students were required to study Aristotle's seminal works. In 1783, Hugh Blair published one of the most influential books on rhetoric of that time. The book, *Lectures on Rhetoric and Belles-Lettres,* was used as the standard text to study rhetoric at universities for over one hundred years.

The escalated use of mass media, the growth of media outlets and the infinite expanse of information brought on by the digital age in the 20th and 21st century led to a shift in the study of rhetoric. In the 1950s and 1960s the term "new rhetoric" was coined. Rhetoric and the use of language to present information and arguments has become more relevant than ever. The spoken word as well as written texts are powerful tools to appeal to needs of target audiences. Craig (1999:135) stresses the importance of rhetoric in the present time and defines it as the practical art of written and spoken communication.

2.6.2.2 Definitions of classic rhetoric

According to Garwood (2014:20), the rhetorical theory uses language to inspire and persuade people to think, feel and act in a certain way. The best-known definition of rhetoric comes from Aristotle's dissertation, *The Art of Rhetoric*. Aristotle defines rhetoric as "the faculty of observing in any given case the available means of persuasion" (Wray, 2016:11).

For Aristotle, successful persuasion depended on (Greene, 2013:1414):

- the speaker’s ability to demonstrate his credibility and reputation;
- the presence of inductive and deductive reasoning in the speaker’s argument; and
- the speaker’s ability to evoke emotions from the audience.

James (2009:33-34) states that Aristotle developed the skill of rhetoric as a “systematic method of communication”. This method of communication applies to modern communication in the same way it applied to the classical context of oration.

According to Craig (1999:135), rhetoric theorises communication as a practical art of discourse. Rhetoric is, therefore, a speaker’s attempts to address and guide the decisions and judgements of an audience. Griffin (2015:40-41) defines rhetoric as “the art of using all available means of persuasion, focusing upon lines of argument, organisation of ideas, language use and delivery in public speaking”.

Lowenhaupt (2014:449) recognises that both linguistics, the words that the persuader uses, and sociolinguistics, the effects that the words have on society, play an important role in rhetoric. Corbett and Connors (1999:73) emphasise the importance of shared experiences and language between the persuader and the audience. According to Wray (2016:13), rhetoric is found in the shared experiences between the speaker and the audience as well as the language used to convey the message.

For persuasion to be successful, the audiences should be convinced of a particular viewpoint (Brennan & Merkl-Davies, 2014:607). Garwood (2014:20) states that although rhetoric’s primary focus is on persuasion through speech, the theory could also be applied to other contexts, such as written text and other visual representations.

According to Brennan and Merkl-Davies (2014:612), rhetoric is embedded in the rhetorical situation. The rhetorical situation is the context in which the communication takes place. The rhetorical situation consists of three interrelated elements (Garwood, 2014:21):

- the speaker;
- the audience; and
- the subject or topic.

In his thesis, Aristotle depicted the three elements as a triangle to illustrate their interrelatedness. The purpose of the communication sits at the centre of the triangle. Figure 2.2 illustrates the rhetorical triangle.

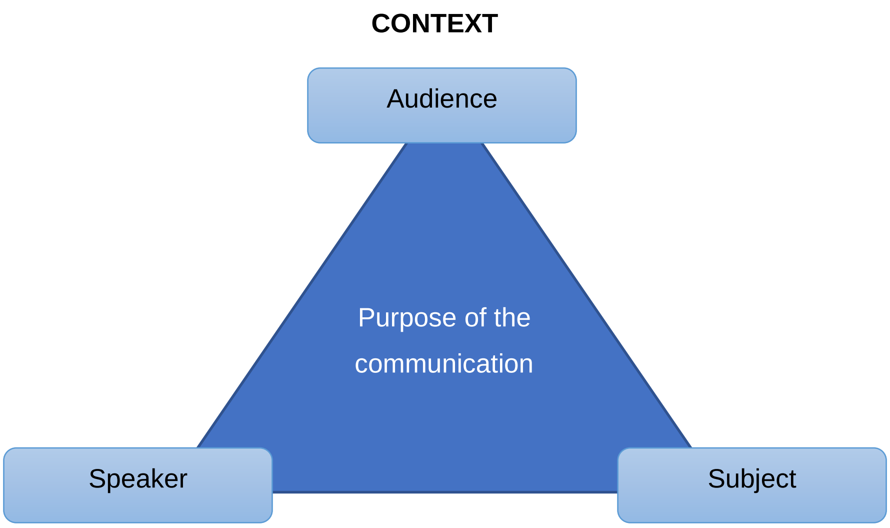

Figure 2.2: **The rhetorical triangle (Garwood, 2014:21)**

2.6.2.3 What is the new rhetoric?

The term ‘new rhetoric’ developed from the efforts of scholars, such as Kenneth Burke, to redefine and broaden the scope of classical rhetoric in view of theory and practice associated with the 20th century (Nordquist, 2019).

In 1952, Kenneth Burke described new rhetoric as follows:

"*The difference between the 'old' rhetoric and the 'new' rhetoric may be summed up in this manner: whereas the key term for the 'old' rhetoric was* *persuasion and its stress was upon deliberate design, the key term for the 'new' rhetoric is identification and this may include partially 'unconscious' factors in its appeal. Identification, at its simplest level, may be a deliberate device, or a means, as when a speaker identifies his interests with those of his audience. But identification can also be an 'end,' as 'when people earnestly yearn to identify themselves with some group or other*” (Wolin, 2001).

This description is particularly relevant for plain language. According to Nord (2018:46), rhetorical knowledge is a requirement for plain language. Rhetorical knowledge refers to “audience design” or “adaptation to the recipient”, or as Burke phrases it, “identification” with the target audience (Nord, 2018:46; Wolin, 2001). According to Schriver (2012:282), to effectively communicate with the target audience, communicators have to coordinate their subject-matter knowledge with their rhetorical knowledge. Rhetorical knowledge comprises knowledge of the target audience’s needs and expectations and how to design a document to suit these needs.

James (2009:33-34) further states that rhetoric focuses on the target audience just like plain language. Rhetoric consists of audience-focused methods for delivering public discourse to achieve practical outcomes. It is not only a common context that places plain language in the rhetorical theory, but also the processes and methods the two have in common.

2.7 PLAIN LANGUAGE AS THE NEW RHETORIC OF ORGANISATIONS

Plain language can be considered the new rhetoric of organisations, because organisations cannot communicate effectively if they do not have rhetorical knowledge, i.e. knowledge of their target audience’s needs and expectations (Schriver, 2012:282; Nord, 2018:46). Furthermore, organisations cannot communicate effectively if their messages are not understood by the target audiences.

This section discusses the similarities between plain language and the rhetorical theory of communication. For this research, the rhetorical triangle, Aristotle's three means of persuasion and Cicero's five canons of rhetoric will be considered in relation to the principles, elements and definition of plain language.

2.7.1 Rhetorical triangle

The rhetorical triangle consists of three elements, namely the audience, the speaker and the subject. The three elements are situated in the specific context in which the communication takes place. This context could be considered the fourth element of the rhetorical triangle (Garwood, 2014:21). Table 2.4 compares the four elements of the rhetorical triangle to plain language.

Traditional element	Plain language equivalent
Audience	Readers (target audience)
Speaker	Writers (plain language professionals)
Subject	Texts (the language and linguistic strategies in the text)
Context	Where, when and why plain language is used

Table 2.4: Plain language equivalent of the four elements of the rhetorical triangle (Garwood, 2014:21)

Figure 2.3 illustrates how the rhetorical triangle can be applied to plain language.

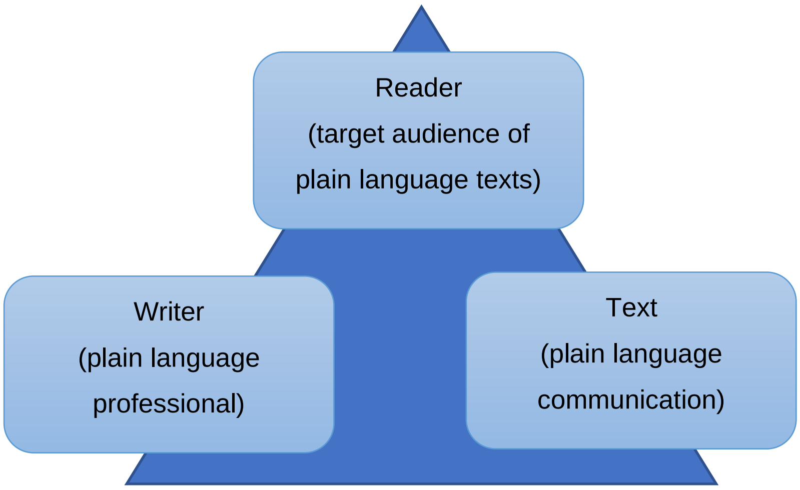

Figure 2.3: Rhetorical triangle applied to plain language (Garwood, 2014:22)

2.7.1.1 Reader

Readers, or target audiences of texts, are often viewed as passive players in the rhetorical situation with their only action being accepting or rejecting the writer's persuasive efforts (Garwood, 2014:81). However, according to Brent (1992:39), readers should be considered active players because readers collate, evaluate, interpret and assimilate the information contained in a text.

Plain language focuses on the outcomes of a reader's engagement with a text (Garwood, 2014:82). Readers contribute different experiences and ideas to the same text and use their personal experiences to give meaning to the text (Garwood, 2014:229). Two readers could therefore understand and interpret the same text in dramatically different ways. User testing is, therefore, important to test assumptions about the target audience (Garwood, 2014:230).

User testing is central to an outcome-based approach to plain language (Cheek, 2010:4). The ultimate goal of plain language is for readers to understand a text the first time they read it. User testing is the only way in which to determine if a document is in plain language. The best way to test documents for plain language is to conduct interviews or focus groups with the target audience. These testing methods would elicit feedback directly from the readers (MSKTC, 2014:7).

2.7.1.2 Writer

In the rhetorical situation, the writer is responsible for the reader's understanding and comprehension of a text (Garwood, 2014:205). Writing documents in plain language, therefore, requires placing the needs of readers first and writing with their unique goals in mind. Eagleson (2009:11) adds that it is the responsibility of the writer to make the text appealing to the reader. It is imperative that the writer focuses on making the text easy for readers to access and understand (Bivins, 2008:21).

According to Stephens, Black and Redish (2010:8), "a writer's goal must be to create a document that is ideally suited for its intended purpose". Writers must, therefore, know who the intended target audience is and what the document aims to achieve i.e. the document's purpose. The general purposes of documents are to (Stephens *et al*., 2010:9):

- persuade the reader;
- inform the reader; or
- gather information from the reader.

2.7.1.3 Texts

Texts are equal to the plain language communication in the rhetorical situation. Bivins (2008:21) states that the content, structure and design of the text should focus on the reader. This will allow the reader to better understand the writer's intended message. A number of plain language guidelines exist to help the writer to write documents in plain language that the reader will understand (Bivins, 2008:29). These guidelines, for example, encourage "the use of active voice, a simple sentence structure and first- or second-person voice by using pronouns such as *you* and *we*" (Bivins, 2008:30).

Garwood (2014:234) emphasises the importance of user testing with the following quote: “No matter how plain the text, no matter how many guidelines are applied, no matter how expert the writer, it is impossible to know if the text will be effective until we see how the audience reacts”.

2.7.1.4 Context

The rhetorical theory puts emphasis on the importance of context in the exchange of meaning (Garwood, 2014:102). Garwood (2014:21) states that context is when, where and why plain language is used. Plain language writers have to be sensitive to the context that surrounds a plain language text, because the meaning of the text greatly depends on the context (Garwood, 2014:18). Burt (2009:43) adds that a text must take into account the reader’s situation.

Readers approach texts with a set of expectations and a number of goals in place. The expectations are based on their previous knowledge and experience with similar texts. The context of their goals influences how they process and interpret the text (Garwood, 2014:87).

Plain language, therefore, requires writers to change the way they think about readers and texts. Writers have to put readers first by finding out what they need from a text and then shaping the text to meet their needs (Garwood, 2014:239).

2.7.2 Aristotle’s three means of persuasion

Aristotle’s three means of persuasion, also called the three tenets of rhetoric, are appeals that speakers or writers use to persuade audiences that their assertions are valid (Wray, 2016:12). The three means of persuasion are:

- Ethos: the appeal linked to credibility and integrity;
- Logos: the appeal linked to logic and reason; and
- Pathos: the appeal linked to emotion.

According to Wray (2016:13), the three means of persuasion are interrelated, and the persuasive power of most arguments result from a combination of all three types of appeal. A closer look will be taken at the three means of persuasion, and each appeal will be linked to the principles of plain language.

2.7.2.1 Ethos (credibility and integrity)

Ethos is a persuasive appeal that relates to a person's credibility or integrity as a persuader (McKay & McKay, 2010; Wray, 2016:13). The persuader should earn the trust of their audience. According to Lowenhaupt (2014:449), the speaker or writer's ethical stance must be aligned with the listener or reader's moral code. To establish legitimacy, persuaders are inclined to include their ethical stance throughout their arguments.

Brennan and Merkl-Davies (2014:608) is of the opinion that ethos can be used to persuade audiences by "either appealing to the authority of the speaker or writer, the authority of another social actor, or the authority of the law". McKay and McKay (2010) suggest that for Aristotle, ethos rests upon a persuader's knowledge about a topic and their ability to validate their integrity and reputation.

According to McKay and McKay (2010), there are several ways a speaker or writer can establish ethos with the target audience. Firstly, a speaker or writer can start their speech or text by specifically stating their expertise on a subject. This could however be perceived by the audience as abrasive and quite arrogant, especially if past evidence does not indicate that the speaker or writer has a trustworthy reputation. Secondly, the persuaders can rely on their previous behaviour to establish credibility and rapport with the target audience. This means that the audience can only be persuaded if they already have a solid, trusting relationship with the speakers or writers.

Thirdly, ethos can be established by creating common ground with the audience. This involves the speaker or writer acknowledging shared values and beliefs or recognising shared history. Lastly, living a life of virtue can lead to developing ethos with the target audience. The audience is more likely to feel dedicated and committed toward a speaker or writer that is virtuous and honest in their speech or in their writing. According to McKay and McKay (2010), living a life of virtue is the best way to establish ethos with the target audience.

According to Buckley (2011), plain language shows honesty and humanity, and therefore promotes trust. Maslansky, West, DeMoss and Saylor (2011:11) add that plain language is a virtue of credibility. Organisations can develop their ethos by writing in plain language (Patterson, 2014). Clear communication builds trust and confidence (Rees, 2009:7). A simple and engaging argument is required to gain an audience's attention as well as their trust (Maslansky *et al.,* 2011:11). Therefore, if consumers or customers understand an organisation's documents, it is more likely that they will also trust them.

2.7.2.2 Logos (logic and reason)

According to Suddaby and Greenwood (2005:44), logos is an argument based on sound logic and reason. Logos is furthermore an appeal to the intellect of the audience (Wray, 2016:14). Brennan and Merkl-Davies (2014:608) suggest that logos attempts to convince the audience by means of "facts and figures to back up a particular claim and it involves the use of discourse from the domains of science, technology, bureaucracy, law and business to persuade audiences of the validity and legitimacy of the claim".

In *The Art of Rhetoric*, Aristotle maintains that logical argument means the words of the speech or text itself must do the persuading (McKay & McKay, 2010). In the Ancient Greek times, this was achieved by making inferences and using deductive reasoning. According to McKay and McKay (2010), an argument is sound if "the argument is valid, and all of its premises are true". Logos was Aristotle's preferred persuasive appeal (McKay & McKay, 2010). However, he recognised that the audience might not always be able to understand an argument solely based on scientific and logical principles, and that it is therefore necessary to use other appeals such as persuasion through the use of emotive language.

According to PLAIN (2017), a document is in plain language if its sequence is logical and easy for readers to navigate. Payton (2013) articulates that plain language is about clear communication where information is presented in a straightforward and logical way. Hafner (2006:39) adds that any effort to make a text more accessible for the reader would be undermined "if the underlying rhetoric and logic of the text serves to exclude anticipated readers".

Logos, or logic and reason, plays an important role in plain language. A reader is more likely to respond positively to a document that is written in a logical manner and is easy to navigate. Therefore, for a piece of writing to be in plain language it should appeal to the target audience's way of thinking and reasoning.

2.7.2.3 Pathos (emotion)

For Aristotle, pathos meant using emotion to sway the audience's opinion toward accepting the speaker, or rejecting their opponent (Greene, 2013:1414). According to Brennan and Merkl-Davies (2014:608), pathos is aimed at evoking emotional responses from the target audience, which is the listener or the reader. An indirect appeal to the imagination of the audience is required to evoke emotion.

Furthermore, pathos involves the use of figurative language and metaphors (Brennan & Merkl-Davies, 2014:608). Lowenhaupt (2014:449) adds that figurative language and metaphors are especially effective when they correspond with and play into the value system of the audience.

Emrich, Brower, Feldman and Garland (2001:553) propose that a deeper level of emotional appeal is required for audiences to not only comprehend the speaker or writer's message but also act upon it in the correct manner. The appeal will be even further accelerated by using words and imagery that are associated with people and stimuli from the audience's past. McKay and McKay (2010) add that storytelling is a powerful method of persuasion. Stories that tap into emotions are often better remembered than objective facts.

According to Patterson (2014), words have emotions attached to them. Writers persuade by appealing to the target audience's emotions. If an organisation can correctly judge and address emotions, they can win over the audience. It is easier for an organisation to appeal to emotions when their consumer or customer documents are in plain language. Clear communication ensures that the reader knows what is expected of them and will motivate them toward the desired action.

2.7.3 Cicero's five canons of rhetoric

Cicero divided rhetoric into five canons, namely invention, arrangement, style, delivery and memory (James, 2009:33). According to McKay and McKay (2011), the five canons of rhetoric "constitute a system and guide on crafting powerful speeches and writing" and could be used as a template to judge effective rhetoric. Table 2.5 gives a definition of each canon of the rhetoric tradition.

Canon of rhetoric	Definition
Invention	The process of developing and refining arguments.
Arrangement	The process of arranging and organising arguments for maximum impact.
Style	The process of setting the style of the speech to a level appropriate to audience and context.
Delivery	The process of practicing the delivery of the speech using gestures, pronunciation and tone of voice.
Memory	The process of learning and memorising the speech.

Table 2.5: Cicero's five canons of rhetoric (McKay & McKay, 2011)

James (2009:34) compared the five canons of the rhetorical theory to plain language using the definition of plain language as found in the NCA and the CPA. Table 2.6 compares the five canons of rhetoric to its plain language equivalent.

Traditional canon	Traditional application	Plain language equivalent
Invention	Discovery of arguments	Content: accuracy, completeness and logic
Arrangement	Arrangement of speech	Structure: effective sequencing of a document structure for a specific purpose
Style	Setting the style to a level appropriate to audience and context	Expression: elements such as word choice, syntax, sentence length, efficiency and tone
Delivery	Delivery of speech	Document design: typography, layout and other visual elements
Memory	Memorising techniques for long passages of text	Databases, manuals, help files and content management systems

Table 2.6: Plain language equivalent of the five canons of the rhetoric tradition (James, 2009:34)

Keeping the definition of plain language in mind, as previously explained, the first canon of invention can be associated with the content of a document. This includes its significance and importance for the target audience. The second canon, arrangement, is parallel to the way in which a document is structured.

Style, the third canon, relates to elements used in a document. These elements are used to organise a document in such a manner that it is clear and understandable to the reader. In the classical time, the fourth canon of delivery meant the vocal delivery of speech (James, 2009:34). But now, for modern documents, it involves design. This is the typography, layout and other visual elements of a document.

The last canon of the rhetorical theory refers to the memorisation of a long speech. Today, databases and content management systems would more likely be used to store documents. Even though the focus of the five canons has evolved, the underlying elements of the rhetorical theory and plain language remain the same.

2.8 CONCLUSION

The information in the first part of this chapter has led to the conclusion that plain language is not an easily defined concept around the world and in South Africa. Internationally, the definitions of plain language have been grouped into three categories. In South Africa, plain language is defined through legislation. Even though, the CPA and NCA provide guidelines, there is no standardised process for implementing plain language as a strategic priority in organisations.

The second part of the chapter placed plain language in the field of communication. The rhetorical theory and plain language share a common context, i.e. a strong focus on the target audience (James, 2009:33). Furthermore, the definition, elements and principles of plain language can be related to those of the rhetorical theory. These similarities ground plain language in the field of communication. This shows that plain language has a rightful place as a field of study and that plain language has become the new rhetoric of organisations. The key considerations for implementing plain language as a strategic priority in organisations will be explored in the next chapter.

CHAPTER 3

Key considerations for implementing plain language as a strategic priority in organisations

3.1 INTRODUCTION

Chapter 3 explores the key reasons for plain language increasingly being thought of as a standard business practice and the key aspects that can support or hamper the implementation of plain language. Figure 3.1 depicts the place of this chapter in relation to the entire dissertation.

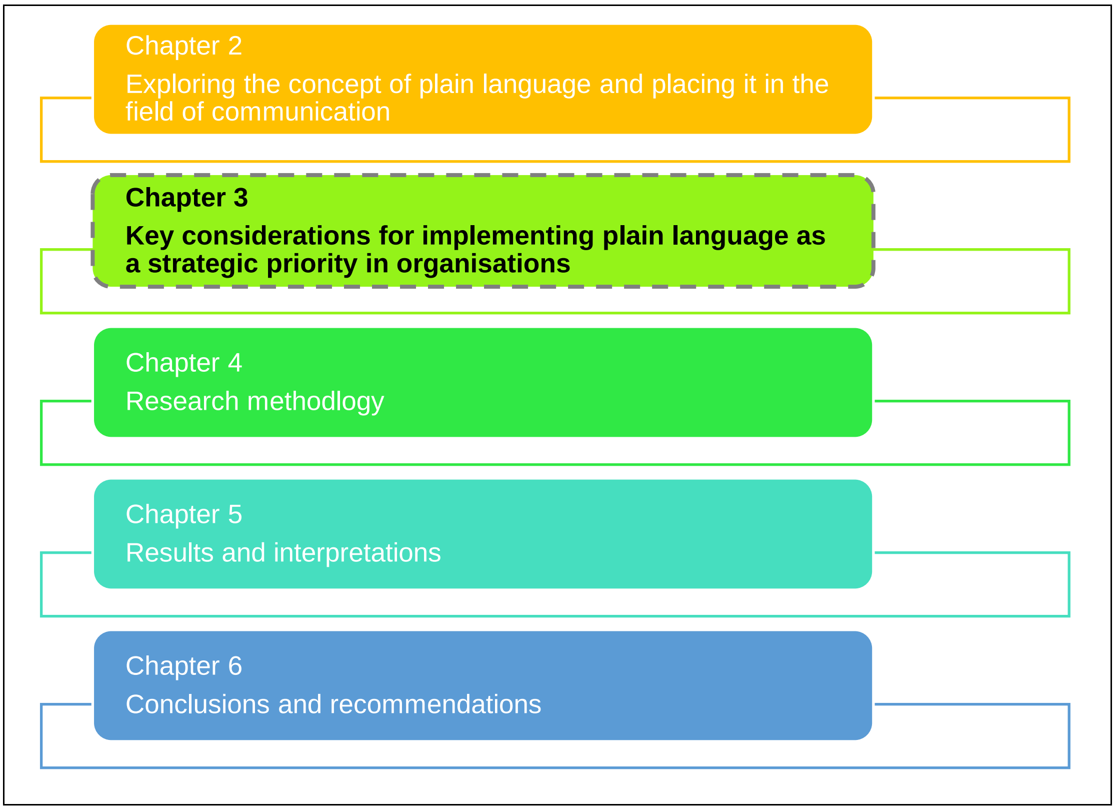

Figure 3.1: Chapter 3 in relation to the entire dissertation

Plain language is a regulatory requirement for most organisations. However, this is not the only reason for arguing that plain language should be standard business practice.

Plain language allows for more effective communication and stakeholder relationships (Prem, 2014), gives organisations a competitive advantage, increase market share and helps them meet the needs of key stakeholders, such as customers and employees (Michalsons, 2017).

3.2 KEY REASONS FOR MAKING PLAIN LANGUAGE A STRATEGIC PRIORITY IN ORGANISATIONS

Understanding the multitude of reasons for adopting plain language in as many areas of organisations, is central to the logic of the conceptual framework which is at the centre of this study.

3.2.1 Regulatory requirements

In South Africa, several laws, regulations and codes of practice require the use of plain language (Burt, 2009:42). There is also other legislation that refers to plain language, i.e. refer to information that is in an ‘understandable’, ‘reasonable’, ‘clear’ or ‘plain’ form (Michalsons, 2009).

Table 3.1 describes the plain language laws, regulations and codes of practice that require organisations to use plain language in their communication.

Laws, regulations and codes of practice	Description of plain language requirement
The Long-term Insurance Act 52 of 1998 and the Short-term Insurance Act 53 of 1998	The Acts require the following: • "Disclosures must be in plain language and structured so as to promote easy comprehension and to avoid uncertainty or confusion"; • "Representations made and information provided to a policyholder by a direct marketer… must be provided in plain language, avoid uncertainty or confusion and not be misleading".
The Companies Act 71 of 2008	Section 6(4) states that "the producer of a prospectus, notice, disclosure or document" must publish it "in plain language, if no form has been prescribed for that prospectus, notice, disclosure or document".
The National Credit Act 34 of 2005	The Act requires that "information to consumers must be in plain and understandable language".
The Consumer Protection Act 68 of 2008	According to Section 22, there is a "right to information in plain and understandable language". The requirement for plain language is extended to all consumer documents.
The Financial Advisory and Intermediary Services Act 37 of 2002	The Act requires that the "representations made and information provided to a client … must be in plain language".
Treating Customers Fairly approach of the Financial Sector Conduct Authority (previously the Financial Services Board)	Outcome 3 states that "customers need to be given clear information and kept appropriately informed before, during and after the time of contracting".
Policyholder Protection Rules (2017)	The amended Policyholder Protection Rules (2017) requires that: • "an advertisement must use plain language" (clause 10.7.1); • "any communication by an insurer to a policyholder in relation to a policy … must be in plain language" (clause 11.3.1); • "if the insurer repudiates or disputes a claim or the quantum of a claim, the notice must be in plain language…" (clause 17.6.3); • "all communication with a claimant must be in plain language" (clause 17.8.3); • "all communication with a complainant must be in plain language" (clause 18.9.3).
Code of Banking Practice	According to the Code, banks must provide their customers "with information in a plain and understandable language format". Furthermore, the members of The Banking Association South Africa undertake to provide customers with information "in plain and understandable language, using standardised terminology and offer assistance on any aspect which you do not understand".
ICASA Code of Conduct	The Independent Communications Authority of South Africa (ICASA) requires that "plain and understandable language" are used in their licensees' consumer contracts.

Table 3.1: Plain language laws, regulations and codes of practice

In addition to the above, the following pieces of legislation also refer to plain language (Michalsons, 2009):

- Children's Act 38 of 2005
- Basic Conditions of Employment Act 75 of 1997
- Customs and Excise Act 91 of 1964
- Employment of Educator's Act 138 of 1994
- Health Professions Act 56 of 1974
- Higher Education Act 101 of 1997
- Housing Consumers Protection Measures Act 95 of 1998
- Medicines and Related Substances Control Act 101 of 1965
- Military Veterans' Affairs Act 17 of 1999
- Mine Health and Safety Act 29 of 1996
- Public Finance Management Act 1 of 1999.

According to Michalsons (2009), organisations tend to ignore the above plain language requirements when drafting their documents. This makes plain language an afterthought that is haphazardly implemented as a quick fix to satisfy the regulator (Burt, 2009:44).

Non-compliance with the regulatory requirements of plain language could have severe consequences for organisations. Administrative fines could be levied against those who do not comply. The penalties could be as much as 10% of the annual turnover of the company's preceding year of business (capped at one million rand) (Burt, 2009:44).

In addition, there are several ways for consumers to enforce their rights to plain language (Burt, 2009:44). They can refer their dispute or complaint to the relevant Ombud, to the Consumer Commission and, as a last resort, to the Consumer Tribunal. According to Burt (2009:44), these routes to justice are intended to avoid cumbersome and costly court cases. However, disputes regarding terminology must be referred to the courts, and only the courts are authorised to set aside or change contract wording in favour of the consumer.

In 2012, the first court case on plain language appeared in the Durban High Court (De Stadler, 2012). The Court used the provisions for plain language in the NCA and CPA to rule in favour of a consumer who did not understand the terms and conditions of a finance agreement with a bank. If the consumer understood the contract, the dispute would not have reached the courts and the bank would not have suffered the associated reputational and legal costs (De Stadler, 2012). Plain language is therefore also good for business.

3.2.2 Effective communication and stakeholder relationships

According to Mountain (2014), plain language is a clear and concise writing style that ensures accessibility to information for all stakeholders. Plain language is therefore critical to successful stakeholder relationships and it makes business sense for companies to communicate to their target audiences, that is their stakeholders, in plain language.

It is important that organisations continuously make strategic decisions on how they will engage with their strategic stakeholders (Hallahan, Holtzhausen, Van Ruler, Verčič & Sriramesh, 2007:4). Organisations use communication as a process to build relationships with its stakeholders (Gronstedt, 2000:14). An organisation’s strategic stakeholders are the target audiences of their internal and external communication. However, the only way an organisation can communicate effectively with these stakeholders is if their messages (written or spoken) are understood.

Plain language also plays an important role in facilitating two-way symmetrical communication. Two-way symmetrical communication means an organisation is willing to listen and respond to the concerns and interests of their stakeholders (Roper, 2005:69). Two-way symmetrical communication is effective when an organisation has established mutual understanding with its stakeholders. Mutual understanding means that the receiver of a message analyses and understands the sender’s message as it was intended (Meintjies, 2012:86). According to Doss *et al*. (2015:298), plain language increases the chances of establishing mutual understanding between the sender and receiver of a message.

Organisations that practice two-way symmetrical communication tend to rely more on systems thinking (Meintjies, 212:86). The general systems theory is grounded in the belief that there is an interdependent relationship between organisations and its stakeholders (Newsom, Van Slyke Turk & Kruckeberg, 2007:119). Two-way symmetrical communication therefore allows for more input from stakeholders.

Input or feedback is also a central component of plain language. The only way to know if a piece of communication is in plain language is to get feedback from the target audience. This means that organisations have to conduct user testing with their stakeholders (Cheek, 2010:4). User testing could therefore be considered as a way to get input from stakeholders so that mutual understanding can be established between an organisation and its stakeholders.

Organisations use two-way symmetrical communication to build and maintain long-term relationships with their stakeholders. Two way symmetrical communication balances the interest of the organisation with that of its stakeholders. According to Edwards (2006:146), the mutual understanding that results from open two-way communication forms the basis of a sound relationship between the organisation and its stakeholders (Newsom *et al*., 2007:120). One of the tangible means of effective two-way symmetrical communication with stakeholders is plain language. Clear and understandable communication should therefore be standard business practice because it is critical to successfully build and maintain stakeholder relationships (Prem, 2014).

3.2.3 Customer centricity

The age-old saying, "the customer is always right", emphasise the importance of customers for business and why customers have now reached the top of the organisational pyramid (Masterson, 2016). Figure 3.2 compares the traditional organisational chart with the modern customer-oriented organisational chart (Bhasin, 2017).

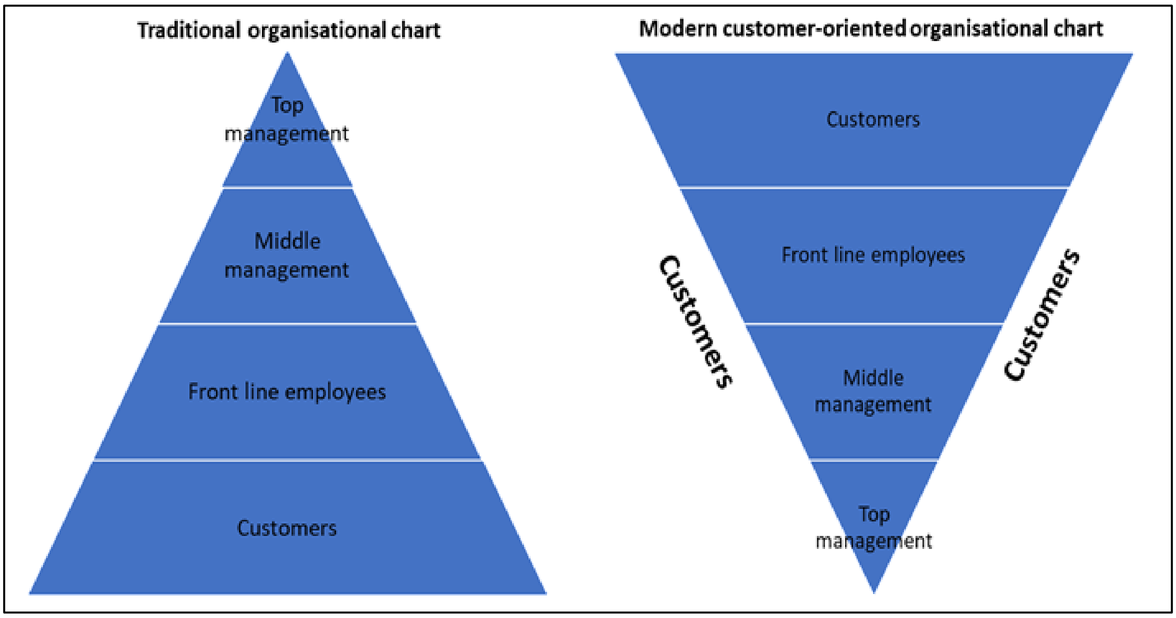

Figure 3.2: Traditional versus modern organisational chart (Bhasin, 2017)

Traditionally, top management were given the most important position at the top of the organisational chart. Middle management were second because they are also involved in organisational decision making to a certain extent (Bhasin, 2017). Middle management were responsible for giving orders to front line employees who in turn interacted with customers (located at the bottom of the pyramid).

Over the years, customers have gained more importance and are at the top of the modern customer-oriented organisational chart (Bhasin, 2017). Customers now get attention from the whole organisation. The front line employees, who regularly interact with employees, have also gained more prominence in the modern organisational chart. The shift from a traditional to a more customerorientated organisational chart emphasises the importance of customer centricity for the modern business.

It is important for organisations to build and maintain healthy customer relationships in order to sustain the performance of their business (Magid, 2017). Customer centricity is therefore crucial for companies, especially those in competitive industries such as the short-term insurance industry, to gain a competitive advantage. “A customer-centric approach provides value for customers by responding to their wants and needs through tailored experiences and products” (Consulta, 2018). In turn, customers will remain loyal to customer-centric companies.

According to Fader (2012:9), customer centricity is a strategy that aligns a company’s products and services to the needs and expectations of customers. However, the ultimate long-term aim of such a strategy should be to increase the profit margin of the company through serving its customers. To remain profitable, companies therefore have to put the needs and expectations of their customers first.

Consequently, the focus of modern companies is the same as the focus of plain language. Plain language is concerned with the needs and expectations of the target audience (PLAIN, 2017). For a document to be in plain language, it has to be understood, taken up and used by the intended target audience. Because customers are undeniably the most important stakeholder of the modern business, they are also the most important target audience. This makes plain language imperative for any organisation that wants to follow a customer centric approach in today’s competitive business environment.

3.2.4 Customer understanding

Customers must understand the products and services that they receive from organisations. According to the Plain Language Institute (2010), plain language plays a key role in reaching and impacting customers. It is therefore essential for organisations to implement plain language as a strategic priority and use it in their communication and marketing.

In some industries there are more than one target audience. For example, in the insurance industry, a policy document serves the customer and the broker (Lewarne & Britz, 2013). Hay (2018) states that it is very important for customers and brokers to understand policy wordings. The overall purpose of a policy wording is to "ensure there is an understanding of what is covered" (Lewarne & Britz, 2013). A policy document explains the cover that is available to customers and what the conditions of that cover are.

A policy wording that is written in a clear and understandable manner, i.e. in plain language, will make the relationship between the insurer and the customer more transparent by ensuring that there is no ambiguity in what is covered or in the conditions that are associated with the cover (Lewarne & Britz, 2013).

According to Johnson and Mullany (2018:5), the benefits of a clear and understandable policy wording is a policy contract that is:

- easier to enforce;
- easier to sell; and
- less likely to lead to regulatory difficulties.

When policy wordings are clear and understandable, the broker or sales adviser has less to explain and there should be fewer questions about the cover that the policy offers (Child, n.d.; Michalsons, 2014). If both parties, i.e. the insurer and the customer (or broker), understand what the policy covers there is no room for disagreements or disputes with the Ombud or in court (Child, n.d.; Michalsons, 2014).

3.2.5 Business benefits of plain language

The business benefits of implementing plain language as a strategic priority include (PLAIN, 2018; Michalsons, 2014; Plain Language Institute, 2010):

- Plain language saves a company time, money and personnel resources, which in turn has an effect on the company's bottom line;
- Plain language gets a company's message across in the shortest amount of time because there is less chance that customer communication in plain language will be misunderstood;
- Plain language improves customer service. Customers prefer to deal with companies that are open and transparent. "Companies that choose to write clearly, that don't hide behind complex language, communicate that they are trustworthy" (Child, n.d.);
- Plain language communication delivers a consistent brand image and tone of voice (clear, accurate and precise);
- Plain language documents are easier to update;
- Marketing material that are easy and understandable will attract more customers;
- Plain language leads to more engaged employees, who are more likely to:
    - understand the organisation's message;
    - respond to the organisation's message;
    - take part in the organisation's activities; and
    - feel part of the organisation.

Grossman (2018) explains the benefits of plain language for internal communication as follows: "While good internal communication gets the message out, great internal communication helps employees connect the dots between overarching business strategy and their role".

3.3 KEY ASPECTS OF IMPLEMENTING PLAIN LANGUAGE AS A STRATEGIC PRIORITY IN ORGANISATIONS

Understanding the potential contribution of internal and external role players in adopting plain language in as many areas of organisations, is also central to the logic of the conceptual framework which is at the centre of this study.

3.3.1 Key organisational role players

This sub-section briefly describes the traditional responsibilities of the key organisational players, and what their role potentially could be in implementing plain language as a strategic priority.

3.3.1.1 Top management

According to O'Flynn (2018), top management consists of, for example, the executives, board of directors, president, vice-president and CEO of an organisation. Top management is responsible for developing goals, company polies and strategic plans. They also make decisions on the overall business strategy of the organisation and the strategic direction that they want the organisation to take (Wheelen, Hunger, Hoffman & Bamford, 2015:9).

It is top management's responsibility to include plain language in the organisation's overall business strategy as a strategic priority. Plain language should be part of the organisation's strategic planning. This means that the organisation should determine where it is currently in terms of plain language, where it wants to be and how it will get there (Bryson, 2004:32).

In addition, support from top management is critical for the successful implementation of plain language in an organisation (Brockman, 2004:7-10). According to Block (2009:8), it is very difficult to implement plain language in organisations if top management does not demonstrate visible and consistent commitment to change.

Commitment is visible when top management makes a strong business case for plain language (Block, 2009:8-9). This will help middle management and other employees to recognise the benefits of adopting plain language in the organisation. The ultimate goal should be to create a culture in the organisation that supports plain language from top management all the way down to the bottom employees.

A plain language culture can only be established when top management makes their support for plain language visible (Brockman, 2004:7). They should show the benefits of plain language to the other employees by becoming clear writing champions.

According to Valdovinos (2010:43), plain language initiatives are less likely to reach their full potential without the necessary resources and funds. It is therefore important that top management allocate the necessary resources and funds to initiate and sustain plain language training and other initiatives. This is also a way for them to show visible commitment to change and support for plain language in the organisation.

3.3.1.2 Middle and line management

Middle management, such as branch and department managers, are held accountable by top management (O'Flynn, 2008). They are responsible for the operational excellence of the organisation. This means that they are responsible for developing and implementing business unit strategies based on the overall business strategy of the organisation. Business unit strategies determine how the organisation should compete in each of its strategic business units (Grunig & Repper, 1992:120).

Line managers focus on the daily operations of the organisation. Supervisors, section leads, and foremen are examples of line managers. They are responsible assigning tasks and guiding and supervising lower employees in their day-to-day activities (O'Flynn, 2008).

Plain language is central to how the organisation competes in each of its strategic business units also called functions (Brockman, 2004:7). Middle management should therefore include plain language in the functional strategies to ensure that it is made a priority and that it is implemented in the different functions of the organisation.

Line mangers should guide and supervise the lower employees in the use of plain language in their day-to-day work. Furthermore, they should evaluate the employees' plain language competencies in their annual performance reviews and give them feedback on how they can improve their skills (Brockman, 2004:8-10).

3.3.1.3 Product owners

In financial institutions, each product (for example a car and household policy or a life insurance policy) is developed and owned by a specific person or group of persons. They are called the product owners (Plain Language Institute, 2010; Balmford, n.d.).

Product owners are subject matter experts and know the real intent of their documents (Inslee, 2012). It is thus very important, especially for documents with legal implications like policy wordings, that the product owners are onboard with plain language implementation. If they are not onboard, plain language implementation for that particular product will not be successful.

3.3.1.4 The compliance and legal functions

Hargrave (2019) states that the compliance function ensures that the organisation adheres to the external rules and internal controls. In financial institutions, compliance officers are responsible for advising the organisation on compliance regulations, rules and standards applicable to that particular organisation. Furthermore, they are responsible for monitoring, assessing and reporting on the organisation's compliance with the applicable regulations, rules and standards (Basel Committee, 2005:13; Deloitte, 2015:4).

The legal function of an organisation represents the organisation against the relevant legal authorities and regulators. In financial institutions, the legal function reviews all contracts, including contracts with customers such as policy documents, to ensure that it is legally sound and that it will hold up in court from a legal point of view (Deloitte, 2017:4).

The compliance and legal functions are important role players in the implementation of plain language in an organisation. It is the responsibility of the compliance function to review all documents to ensure that the organisation complies with the relevant regulatory requirements of plain language. The legal function must ensure that the plain language revisions of policy documents and other customer contracts are legally sound and that the changes will hold up in court (Cornelius, 2016:36).

3.3.1.5 Human resource management function

It is the responsibility of the human resource management function to manage employee relations and other internal stakeholders in the organisation (Bhattacharyya, 2017). The function should provide good working conditions to employees and promote a healthy and balanced relationship between the employees and the employer, i.e. top management, the board of directors, etc. It is important that employees feel that their needs are taken to heart by the organisation. Good employee relations are key for an organisation to be successful.

Transparency, trust and inclusion, which are all characteristics of plain language, create a more comfortable working environment and better working conditions (Stephens, 2016). Furthermore, when directions are given to employees in plain language, it is more likely that these directions will be understood and followed. Plain language also makes it easier for employees to understand and implement organisational policies. An organisation will earn the trust and the loyalty of employees if they communicate with them in plain language (Plain Language Institute, 2010).

Plain language makes for good employee relations and it is therefore the responsibility of the human resource management function to ensure that plain language is implemented as part of the employee relations of an organisation.

3.3.1.6 The marketing and customer relations functions

The marketing function is responsible for defining and managing the brand and for defining and implementing the marketing strategy of an organisation (Ylilehto, 2014:30). Furthermore, the marketing function develops and coordinates materials that represent the business, such as promotional materials (Verdoy, 2013). Customer and market research are also the responsibility of the marketing function. Some organisations have a separate customer function that is responsible for conducting customer research and for tracking customer satisfaction and experience (Balmford, n.d.).

The marketing function has valuable information on the needs and expectations of an organisation's customers. This information is very important for writing or rewriting customer documents in plain language (PLAIN, 2017). Furthermore, the marketing or customer function has valuable insight into customers' current satisfaction levels and experiences with the organisation's products and services. This information would be helpful to identify the areas in the organisation that should be targeted first when plain language is being implemented (Inslee, 2012).

Furthermore, the implementation of plain language has implications for all brand contact points such as brochures, websites and SMSs as well as other tangible items such call centre scripts. These implications will be further explored in the next section under the discussion of Steyn and Puth's (2000) framework for developing a corporate communication strategy and Niemann's (2005) conceptual framework for integrative communication implementation.

3.3.1.7 The corporate communication function

Cornelissen (2017:5) defines corporate communication as “a management function that offers a framework for the effective coordination of all internal and external communication with the overall purpose of establishing and maintaining favourable reputations with stakeholder groups upon which the organisation is dependent”. Van Ruler and Verčič (2002:16) add that corporate communication is a strategic process that views an organisation from an ‘outside’ perspective. Furthermore, Verčič, Van Ruler, Bütschi and Flodin (2001:382) emphasise that preserving an organisation’s ‘licence to operate’ is of vital importance for the corporate communication function.

The responsibility of the corporate communication function is two-fold. The function is responsible for inward as well as outward communication (Steyn & De Beer, 2012:35):

- Inward communication: the corporate communication function should act as a sensor by gathering information on the public’s expectations of socially responsible behaviour, transmitting this information to the organisation, and encouraging the organisation to adopt behaviour that is in line with the public’s expectations.
- Outward communication: create and distribute information on behalf of the organisation that reflects the organisation’s socially acceptable behaviour in order to earn and maintain the public’s trust.

The corporate communication function is responsible for analysing the position of the organisation in order to plan and develop appropriate communication programmes. It is also the function’s responsibility to evaluate and monitor the success of the communication programmes after implementation (Cornelissen, 2017:9-10).

Dozier, Grunig and Grunig (2002:55-56) identified two primary roles in the corporate communication function, namely the communication technician and the communication manager. The communication technician is responsible for developing communication materials such as publications. The communication manager is responsible for planning, researching, evaluating and budgeting for the organisation's communication efforts (Cornelissen, 2017:159).

Steyn (2000) conceptualised the role of the strategist as part of the corporate communication function. The strategist's activities are performed at the organisational or corporate level of the organisation. The strategist is not a mere information conduit for the organisation, but rather a fully-fledged strategic adviser (Steyn, 2000:260). The corporate communication strategist is responsible for bringing to top management's attention any reputational risks as well as other strategic issues or opportunities that have to be communicated (Steyn & De Beer, 2012:36). In addition, the strategist is responsible for monitoring the environment in order to anticipate the consequences of the organisation's strategies and communication policies. This is also called the mirror function, which is concerned with inward communication (Steyn, 2000:261).

Furthermore, the strategist acts as an advocate for stakeholders by communicating their needs and expectations to top management. This creates awareness among top management of what the impact of the organisation's behaviour will be on key stakeholders. It is also the strategist's responsibility to influence top management in changing the organisation's strategies to meet the needs and expectations of key stakeholders (Steyn & De Beer, 2012:36).

At the functional level of the organisation, the communication manager is responsible for developing a corporate communication strategy that reflect or mirror the business strategy of the organisation (Steyn & De Beer, 2012:37). The communication technician is responsible for developing an implementation strategy at operational level. This forms part of the corporate communication's window function. The window function is concerned with outward communication and involves the execution of a communication policy and strategy. In other words, communication on behalf of the organisation (Steyn, 2000:261).

The corporate communication function would play an important advisory role in the implementation of plain language as a strategic priority in organisations. Such implementation efforts would prove that an organisation cares about its stakeholders and likely lead to favourable reputations (Mountain, 2014; Prem, 2014). Cornelissen (2017:4) is one of the authors who confirms the importance of this aspect within corporate communication.

Based on the responsibility for inward and outward communication (Steyn & De Beer, 2012:35), the function's potential contribution to implementing plain language could be the following:

- Inward communication: gather information on stakeholders' needs and expectations for plain language, transmit this information to the organisation and encourage the organisation to implement plain language in a way that is in line with the needs and expectations of stakeholders.
- Outward communication: create and distribute information on behalf of the organisation that reflect the organisation's efforts to implement plain language in order to earn and maintain the public's trust.

In terms of the three roles of corporate communication specialists (Steyn, 2000:260), their respective contributions to the implementation of plain language could be:

- Strategist: (i) encouraging top management to include plain language in the organisation's business strategy – serving as strategic liaison between stakeholder needs and organisational priorities; and (ii) monitoring the environment to anticipate the consequences of adopting/failing to adopt plain language as a standard business practice.
- Manager: (i) including plain language in the organisation's corporate communication strategy, i.e. plan, research, evaluate and budget for plain language projects as part of the organisation's communication efforts; and (ii) advising other organisational functions/departments on the implementation of plain language.

- Technician: (i) including plain language in the organisation's communication policy, (ii) developing communication materials that support plain language, e.g. a plain language guide; and (iii) working closely with language specialists to change all relevant materials to plain language, e.g. marketing materials, contracts, product information, social media posts and employee communication.

In addition, plain language would be central to the goal of two-way symmetrical communication (Prem, 2014). According to Grunig (2013) this approach to communication by a corporate communication function that operates strategically, allows for audiences to have a voice at the executive table.

The exact way the corporate communication function could help an organisation implement plain language, would be determined by a variety of organisational variables. This study considers two frameworks, i.e. Steyn and Puth's (2000) framework for developing a corporate communication strategy and Niemann's (2005)'s conceptual framework for integrative communication implementation. The most pertinent aspects of these frameworks for implementing plain language as a strategic priority are discussed below.

- **Steyn and Puth's (2000) framework for developing a corporate communication strategy**

Figure 3.3 illustrates Steyn and Puth's (2000:53) framework for developing a corporate communication strategy. This framework provides valuable insight into the steps that would be required for developing a strategy for plain language implementation in an organisation.

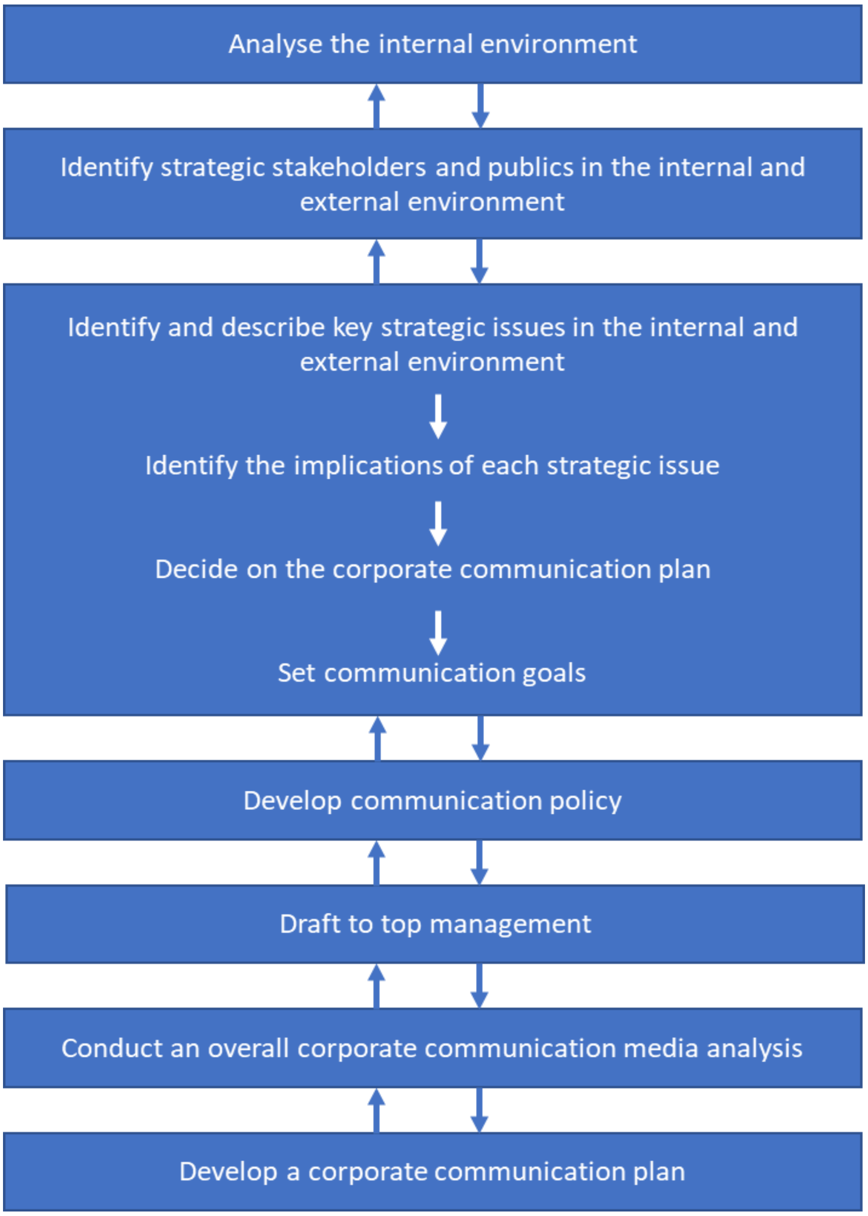

Figure 3.3: Framework for developing a corporate communication strategy (Steyn & Puth, 2000:63)

The above framework could be translated into the following steps for developing an implementation plan for plan language:

Step 1: Analyse the internal environment

Analyse the internal environment of the organisation to ensure than the implementation plan aligns with the organisation's vision and mission, core culture and business strategy.

Step 2: Identify strategic stakeholders

Draw up a stakeholder map of the key stakeholders relevant for plain language implementation; and (ii) identify the stakeholders' needs and expectations with regards to plain language. The role of customers should be emphasised.

Step 3: Identify and prioritise key strategic issues

Identify (i) key strategic issues related to adopting plain language as a standard business practice in the organisation; (ii) the consequences of each strategic issue for the organisation; (iii) the implications of each strategic issue for each strategic stakeholder; and (iv) prioritise the strategic issues.

Step 4: Decide on a strategy for plain language implementation

Decide on a strategy to address each strategic issue for each strategic stakeholder – clarify what must be done (communicated, implemented etc.) to solve the problem or capitalise on the opportunity presented by the strategic issue.

Step 5: Set goals for plain language implementation

Set specific goals for the implementation of plain language derived from the strategy developed in step 4.

Step 6: Develop a policy for plain language implementation

Develop organisational guidelines for plain language implementation, i.e. *who* is responsible to do *what.*

Step 7: Develop a plain language implementation plan

Develop a plain language implementation plan based on the decisions made in steps 1 to 6.

- **Niemann's (2005) conceptual framework for integrative communication implementation**

Three areas of integration are central to Niemann's conceptual framework for integrative communication implementation in the South African marketplace, namely environmental integration, stakeholder integration and organisational integration (Niemann, 2005:273). It appears as Figure 3.4.

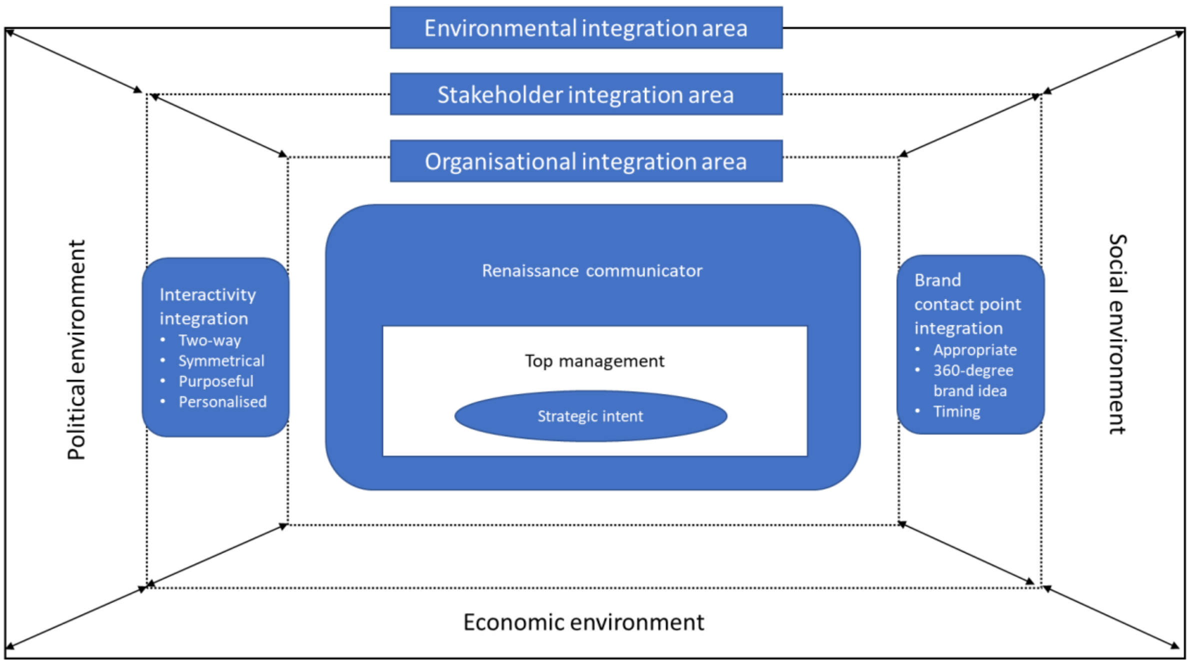

Figure 3.4: Framework for integrative communication implementation (Niemann, 2005:273)

The framework recognises that an organisation must learn from its environment and its stakeholders in order to build and maintain successful stakeholder relationships. In addition, the framework emphasises that an organisation must continuously reposition itself to align with the needs and expectations of stakeholders and what it has learnt from the environment (Niemann, 2005:272).

In terms of environmental integration, the organisation has to consider its political, social, economic and related environments in order to keep abreast of any changes in these environments. The organisation then has to adapt accordingly in order to survive (Niemann, 2005:260.

According to Niemann's framework, stakeholder integration takes place at two distinct levels (Niemann, 2005:255;259):

- Interactivity integration: Communication must be two-way symmetrical, and stakeholders must have purposeful and personalised interactions with the organisation.
- Brand contact point integration: (i) The organisation's message delivery system must be stakeholder appropriate; (ii) continuously learning about stakeholders' needs and expectations ensures a 360-degree brand idea; and (iii) the timing of messages should be based around stakeholder preferences.

Niemann (2005:247-248) identified two levels within the organisational integration area, i.e. top management integration and the renaissance communicator. There is a need for top management involvement as initiators in the conscious integration of integrative communication at top management level. Furthermore, it is important that organisation's strategic intent (vision, mission, goals and objectives) aligns with the integrative communication initiative. Similarly, as explained in section 3.3.1.1, it is crucial for top management to act as the initiator of plain language implementation as a strategic priority.

The renaissance communicator could be considered the potential "definitive" practice of communication at a strategic level in the organisation. This means that the renaissance communicator proposes communication answers to organisational problems at a strategic level. Furthermore, the renaissance communicator focusses on internal and external communication to promote increased organisational reflexivity, which in turn leads to greater organisational success (Niemann, 2005:274). The responsibility of the renaissance communicator is to ensure that there is strategic consistency in all the communication efforts of the organisation.

The renaissance communicator could contribute to the implementation of plain language in the following ways:

- Prioritising plain language at a strategic level as an answer to organisational problems; and
- Ensuring that plain language is consistency implemented in the internal and external communication of the organisation through all the brand contact points/experiences.

3.3.1.8 Plain language practitioners

Plain language practitioners are private organisations or law firms that have developed their expertise in plain language (Cornelius, 2012:76). Plain language practitioners apply specific strategies to critically analyse and improve the clarity of documents. They conduct user testing and also provide plain language training to organisations.

Plain language practitioners play a very important role in helping organisations to implement plain language. These practitioners have the necessary insight and skills to assist organisations in developing a proper and sustainable implementation plan. Furthermore, they could assist the organisation with training to better develop the skills of employees in plain language. Where the organisation lacks the necessary resources, plain language practitioners could assist with developing documents in plain language and with user testing (Plain Language Institute, 2010.).

3.3.1.9 Customers and intermediaries

User testing is the only way to determine if documents are in plain language and whether they meet the needs and serve the expectations of the target audience (Gordon, 2011; Inslee, 2012; Garwood, 2014:230). Customers and other intermediaries such as brokers are therefore important external role players. Organisations must continually engage with customers and other intermediaries to firstly identify the needs of their target audiences and finally to test the documents that they have developed in plain language.

3.3.1.10 Regulators

Industry regulators authorise and supervise the compliance regulations of a particular industry such as the banking or insurance industry. They are responsible for investigating, gathering and sharing compliance information as well as imposing penalties for non-compliance (Hargrave, 2019). It is important for organisations to have a good relationship with the regulators relevant to their industry. In this way, organisations will know exactly what is expected of them in terms of plain language compliance and they will be kept updated of any changes in the regulations and how these changes will impact on them.

3.3.2 Key steps for effective implementation efforts

It is imperative for organisations to have a clear plan in place for implementing plain language as a strategic priority. The implementation plan should have a clear focus and purpose. The implementation plan should reflect the fact that plain language is not only a regulatory requirement but that it is a critical business requirement by which organisations can improve their communication and stakeholder relationships as well as achieve a competitive advantage in the market.

Inslee (2012) proposes the following key steps to implement plain language in an organisation:

- Propose a solution to a business problem
- Start with a simple project
- Get trained
- Build trust
- Negotiate throughout the writing process
- Conduct usability tests
- Get signoff
- Decide how to measure success
- Market the project.

3.3.2.1 Propose a solution to a business problem

For plain language to succeed in any organisation, employees must participate in the process and show their support (Brockman, 2004:6-7). Employees are more likely to show their support as well as adopt plain language behaviour when they know upfront what the pay-off will be (Inslee, 2012).

Inslee (2012) suggests that an organisation has a clear vision for its plain language implementation by making it a solution to a specific business problem. This will help to get the support and buy-in from day-to-day managers and other employees.

3.3.2.2 Start with a simple project

It is important to identify the key individuals that must be part of the decision-making process when plain language is implemented in an organisation. It is the task of these key individuals to identify the priority areas in the organisation where plain language must be implemented first.

Inslee (2012) recommends as a starting point that the organisation “creates a simple, targeted project aimed at solving a specific problem” instead of “mapping a plan to revise every single document”. If the project is successful, plain language could be extended and further implemented in the organisation.

3.3.2.3 Get trained

All the employees who are involved in implementing plain language in the organisation should be trained on the basic principles of plain language. The training should preferably be conducted by an external plain language practitioner or by the organisation’s communication function. To complement the training a plain language guide can be developed to demonstrate, with examples, the basic plain language principles that were taught to the employees (Brockman, 2004:8).

3.3.2.4 Build trust

According to Inslee (2012), writing is a personal matter and therefore it is crucial that the people working together on a plain language project trust each other. Subject matter experts become attached to the terminology they use in their day-to-day operations and might become defensive if one suggests shorter explanations and simpler language. Furthermore, these experts can be reluctant to make changes to their writing because they are afraid of changing the intent or meaning of the document.

Inslee (2012) proposes the following ways in which trust could be established between people working together on a plain language project:

- Focus on solving the business problem at hand and not on the writing;
- Identify positive aspects about the writing in the original document; and
- Find out what the reasoning and history behind the original document is.

3.3.2.5 Negotiate throughout the writing process

Writing a document in plain language entails continual negotiation (Inslee, 2012). The most important negotiation takes place between the subject matter expert, the legal representative and the plain language expert. The subject matter expert and the legal representative have to make sure that the plain language “translation” is legally sound, while the plain language expert has to ensure that the document is clear and easy to understand. The plain language process will only succeed if the team members continually negotiate throughout the writing process to establish common ground.

3.3.2.6 Conduct usability tests

After a plain language draft has been completed, usability tests with typical customers have to be conducted (Inslee, 2012). Usability tests are the only way to know if the document will work in the real world. User testing is a helpful technique to determine any gaps in the writing or any misunderstanding that the team did not anticipate. Usability tests are, however, expensive and provision should be made for it in the budget of the project.

3.3.2.7 Get signoff

It is imperative that the final plain language draft is signed off by all the necessary business units before it is implemented in the business to ensure that the legality of the document is not jeopardised by the simplification of the document (Cornelius, 2016:36).

3.3.2.8 Decide how to measure success

A decision has to be made on how the success of the plain language project will be measured. The measure should be directly related to the business problem identified (Inslee, 2012).

3.3.2.9 Market the project

If the project has been successful, the team members should let people know about it. Inslee (2012) and Brockman (2004:7-10) suggest the following ways for marketing a plain language project:

- Recognise and thank the team members who have participated in the project;
- Let customers know about the changes and the way in which they will benefit;
- Let the rest of the organisation know via a newsletter or the intranet;
- Create a plain language section on the organisation' intranet for before-and-after examples and other resources;
- Run a plain language awareness campaign that is fun and rewards employees for using plain language in their communication; and
- Establish a plain language committee consisting of managers from different business units to further promote plain language in the organisation.

3.4 CONCLUSION

Plain language is not only a regulatory requirement, but a critical requirement for the standard business practice of organisations.

To remain competitive, modern companies must be customer-centric and prioritise the needs and expectations of their customers (Schreuder, 2018). It was established that this can only be done through plain language. It was also determined that plain language is vital for establishing stakeholder relationships and communicating effectively (Prem, 2014). However, the long-term effects of plain language can only be sustained if there is visible commitment and support from top management, plain language is included in the organisation’s business strategy and there is a plan for implementation that sets out the roles and responsibilities of the different functions of the organisation.

CHAPTER 4

Research methodology

4.1 INTRODUCTION

Chapter 4 unpacks the research process that was followed to address the overall goal of the study. Figure 4.1 depicts the place of this chapter in relation to the entire dissertation.

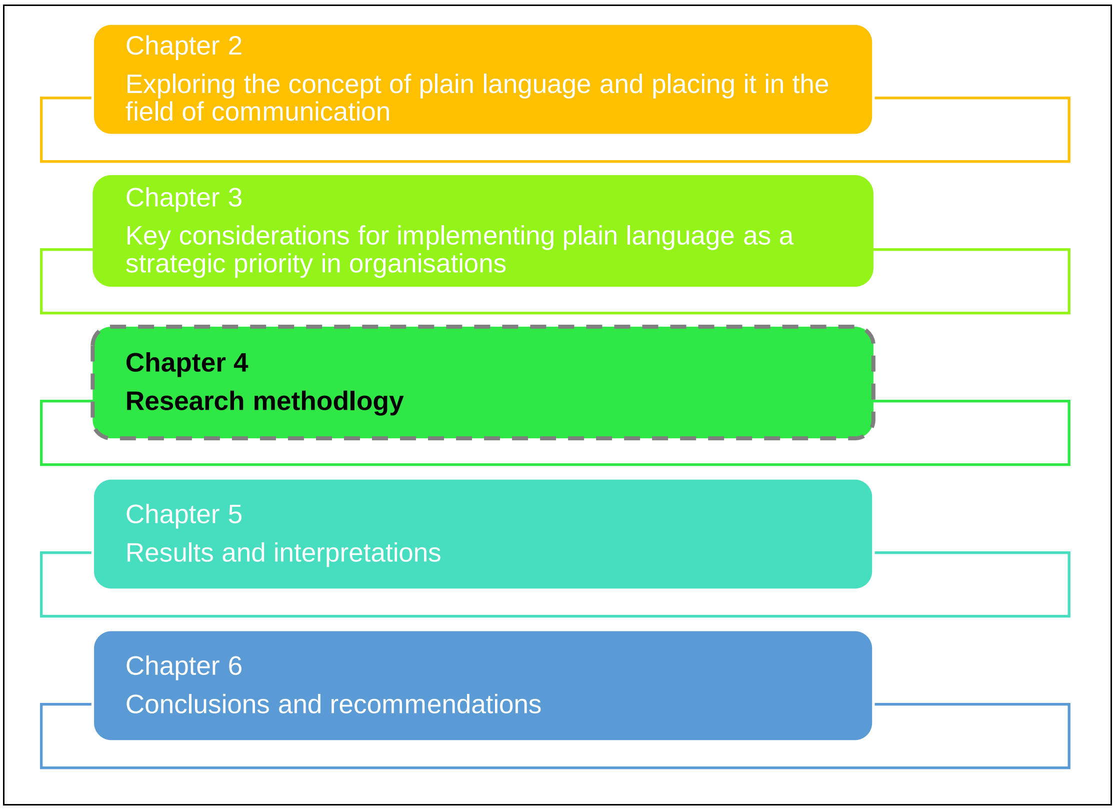

Figure 4.1: Chapter 4 in relation to the entire dissertation

4.2 RESEARCH DESIGN

Research design is the roadmap, or the blueprint, used to address research objectives and answer research questions (Du Plooy, 2009:51; Cooper & Schindler, 2003:81). Furthermore, research design includes the reasoning behind the selection of techniques and tools to analyse raw data to identify themes, categories and codes (Saunders, Lewis & Thornhill, 2009:136-137; Du Plooy, 2009:51).

According to Tong, Sainsbury and Craig (2007:349-350), qualitative research is the use of non-quantitative methods to produce new knowledge, ideas and perspectives. Cooper and Schindler (2003:162) add that qualitative research is used to gain a better understanding of people’s behaviours, experiences and perceptions, as well as to determine the manner and reasons for certain events without the use of statistical quantification. Qualitative research is further best suited for research studies that explore complex phenomena. It is also designed for changing environments where it is necessary to adapt to different contexts (Fossey, Harvey, McDermott & Davidson, 2002:718).

Qualitative research requires research questions and/or objectives in order to achieve a better understanding of the phenomena being investigated. Research questions and research objectives are broad and are aimed at areas where more knowledge is required (Crescentini & Mainardi, 2009:433).

Based on these arguments, it could be established that the qualitative research design was the best suited for this study. The study investigated a complex phenomenon, namely the implementation of plain language as a strategic priority in organisations. The use of a non-quantitative approach, namely in-depth face-to-face interviews, produced new knowledge and ideas to ultimately develop a conceptual framework.

4.3 SAMPLING DESIGN

According to Cooper and Schindler (2003:82), a sample is a smaller part of a specific target population. It is believed that a sample is an accurate representation of a target population. In research studies, samples are used to draw conclusions about an entire target population. The target populations, sampling method and sample size are discussed in the next sections.

4.3.1 Target populations

The target populations relevant to this study were short-term insurance companies and plain language practitioners who work in the short-term insurance industry.

4.3.2 Sampling method

There are two important factors that must be considered with qualitative sampling, namely appropriateness and adequacy (Fossey *et al*., 2002:726). Appropriateness refers to identifying and selecting participants that are best suited for the research study. Adequacy means selecting the most suitable information sources to explain the phenomenon at hand.

Judgemental (purposive) sampling was used for this study. Judgemental sampling is where researchers use their own judgement to select members of the target population who are appropriate for the research and who will give adequate information (Cooper & Schindler, 2003:201). It is believed that the sampling method used for this study is both appropriate and adequate for establishing how plain language could be implemented as a strategic priority in organisations.

Four organisations were identified from the target population of short-term insurance companies. Two participants were selected from each company to act as representatives for this research study. Thus, in total, there were eight organisational representatives interviewed. The representatives selected are all involved in the implementation of plain language in the organisation, but they are from different departments or functions. They have different job titles and are at different strategic levels in the organisations.

Furthermore, two plain language practitioners were selected to participate in the study. Both participants have extensive experience working in the short-term insurance industry. To maintain anonymity in the study, the names of the companies and the representatives as well as the plain language practitioners were not disclosed.

4.3.3 Sample size

There is no predetermined minimum number of participants required to conduct a comprehensive qualitative research study; it depends on the research questions that have to be answered (Fossey *et al*., 2002:726). It is however important that the data collected provides sufficient information on the phenomenon being studied. A large amount of data can be collected with in-depth interviews.

For this research study, ten in-depth, face-to-face interviews were conducted with eight representatives from short-term insurance companies and two plain language practitioners. The participants were carefully selected, and it is believed that they provided enough data to address the research objectives.

4.4 DATA COLLECTION

The data collection technique, the data collection instruments, and the pilot study are discussed in this section.

4.4.1 Data collection technique

The data collection technique chosen for the study is in-depth, face-to-face interviews. According to Fossey *et al.* (2002:727), in-depth interviews are best suited for studies that explore specific topics and a complex phenomenon, such as the implementation of plain language as a strategic priority in organisations.

In-depth interviews encourage participants to give as much information as possible and share insights about the pertinent issues and the themes at hand (Tong *et al*., 2007:351). Furthermore, in-depth interviews allow researchers to probe and ask follow-up questions based on the participants’ answers (Keyton, 2012:374) This could lead to the identification of new themes.

In-depth face-to-face interviews were conducted with eight representatives from short-term insurance companies and two plain language practitioners. During these interviews, the participants were asked open-ended questions and they were encouraged to share as much information as possible on their understanding and experiences related to plain language implementation in their organisations.

4.4.2 Data collection instruments

Two similar but separate interview schedules were used to conduct the interviews. An interview schedule consists of a set of pre-determined questions that guide discussions with participants (Cooper & Schindler, 2003:362). The questions should be clear and concise and should be structured in a way that address the research objectives of the study.

For this study there was a need to understand how strategic priorities are determined and whether the implementation of plain language is considered a strategic priority in these organisations. The aim of the interview schedules was therefore to assist in asking open-ended questions that guided a discussion on this topic with both groups of participants. A first draft of the interview schedules was developed and tested in a pilot study. Subsequent amendments were made to the interview schedules before the final interviews were conducted with the ten participants. The pilot testing process and the subsequent adjustments that were made to the schedules are discussed next.

4.4.3 Pilot study

According to Saunders *et al.* (2009:394), pilot testing involves a dry run of a questionnaire or an interview schedule to identify any issues with the clarity or sequence of the research questions before the actual data collection takes place. Cooper and Schindler (2003:86) add that a pilot study will reveal any weaknesses or errors in the research design.

The interview schedules are similar and therefore only one of the schedules was pre-tested in a pilot study. The pilot study determined the effectiveness and clarity of the interview questions. The interview schedules were amended and refined based on the results of the pilot study.

4.4.3.1 Pilot interview process

During the pilot interview process, an in-depth, face-to-face interview was conducted with a representative from the target population of short-term insurance companies. The same sampling method (judgemental sampling) as for the final interviews was used to select the representative.

The interview was conducted in the workplace environment of the representative. Thus, the interview was an exact imitation of the final interviews and the chances of identifying problems with the clarity and effectiveness of the interview questions were increased. Field notes were taken during the interview.

The results of the in-depth pilot interview were satisfactory, and it therefore justified only doing one interview in the pilot interview process. The findings of the pilot interview resulted in amendments to the interview schedules. The amendments are discussed in the next section.

4.4.3.2 Amendments to interview schedules

Some of the draft questions were found to be unnecessary, repetitive or unclear. Repetitive or unnecessary questions were removed from the final interview schedules while unclear questions were reworded. Based on the findings of the pilot interview, new questions were also added to the interview schedules.

Table 4.1 shows three examples of the amendments that were made to the interview schedules.

Question removed
Example 1:
Tell me about the company's communication with its customers. For example, when they ask for a quote, submit a claim, have a query, etc. Reason: The question seemed to confuse the participant. The question was also unnecessary as most of the companies do not communicate directly with their customers, but through a broker or intermediary.
Question reworded
Example 2:
Original: What do you think influences which insurer a customer or broker choose? What if pricing and benefits were taken off the table? Changed to: When a customer chooses an insurance company, what do you think are the main factors that influence their decision? What if pricing and benefits were taken off the table?
Question changed
Example 3:
The drive for plain language sits at different departments in different organisations. Where do you think should the drive for plain language implementation sit? Reason: It was found that the drive for plain language sits at different departments, e.g. Compliance, Communication, Customer. This is an important aspect of plain language implementation and the practitioners' opinion was therefore asked in this regard.

Table 4.1: Examples of amendments to interview schedules

4.4.4 Final interview schedules

The final interview schedule used to conduct the interviews with the eight representatives from the short-term insurance companies appear in Appendix A. The final interview schedule for the two plain language practitioner interviews can be found in Appendix B. The appendices appear at the end of the document.

The schedules were used to guide the interviews with the two participant groups. The participants were asked open-ended questions to give them the opportunity to express their views and opinions on the different topics. Questions that related to the same topic were grouped together. The question groupings appear in Table 4.2.

Question groupings for short-term insurance companies interview schedule	Question groupings for plain language practitioners interview schedule
Section 1: Organisational profile	Section 1: Organisational profile
Section 2: Strategic management	Section 2: Plain language needs of customers
Section 3: Plain language needs of customers	Section 3: The implementation of plain language
Section 4: The implementation of plain language	Section 4: Awareness of plain language
Section 5: Awareness of plain language	Section 5: Plain language as a profession
Section 6: Service providers	

Table 4.2: Question groupings

The literature review and the research objectives informed the interview schedules. Table 4.3 summarises how the items in the final interview schedule for the short-term insurance representatives correlate with the specific research objectives of the study.

Research objectives	Items in interview schedule
Objective 1: To explore the strategic priorities of organisations.	Questions: 2.1., 2.2., 2.3., 2.4. and 2.5.
Objective 2: To explore the plain language needs of customers as a key strategic stakeholder group	Questions: 3.1., 3.2., 3.3., 3.4., 3.5. and 3.6.
Objective 3: To determine the approaches that organisations follow to implement plain language.	Questions: 4.1., 4.2., 4.3., 4.4., 4.5., 4.6., 4.7., 4.10., 5.1., 5.2., 5.3., 5.4., 6.1. and 6.2.
Objective 4: To determine the degree to which organisations regard plain language as a strategic priority.	Questions: 4.8. and 4.9.

Table 4.3: Research objectives for short-term insurance companies interview schedule

Table 4.4 shows how the items in the final interview schedule for the plain language practitioners correlate with the specific research objectives of the study.

Research objectives	Items in interview schedule
Objective 1: To explore the strategic priorities of organisations.	N/A
Objective 2: To explore the plain language needs of customers as a key strategic stakeholder group.	Questions: 2.1. and 2.2.
Objective 3: To determine the approaches that organisations follow to implement plain language.	Questions: 3.1., 3.2., 3.3., 3.4., 3.5., 3.7., 3.8., 3.12, 4.1., 4.2. and 4.3.
Objective 4: To determine the degree to which organisations regard plain language as a strategic priority.	Question: 3.6., 3.9., 3.10 and 3.11.

Table 4.4: Research objectives for plain language practitioners interview schedule

All the items in the interview schedules relate to the overall goal of the study, which is to develop a conceptual framework for implementing plain language as a strategic priority in organisations.

It should be noted that Question 1 in both interview schedules does not relate to a specific research objective. These questions are introductory questions that were asked to gain a better understanding of the organisational profiles of the short-term insurance companies and the plain language practitioner companies.

4.5 DATA ANALYSIS

According to Fossey *et al.* (2003:726), qualitative data analysis comprises the reviewing, synthesising and interpreting of raw data to look for patterns, extract key ideas and explain the phenomenon at hand.

For this study, two data analysis methods were considered, namely thematic analysis and content analysis. Thematic analysis is a qualitative research method for identifying, analysing, organising and describing patterns of meaning (also called themes) found in a dataset. Thematic analysis is a flexible research tool that provides a detailed and comprehensive interpretation of data. It is however likely that the interpretation could be quite complex (Braun & Clark, 2006:77).

Content analysis comprises the systematic coding of large amounts of text to explore patterns of words and determine their frequencies and their relationships (Mayring, 2000; Gbrich, 2007:10). Content analysis is therefore concerned with the frequency distribution of individual words or phrases (Dicle & Dicle, 2018:1). Content analysis provides researchers with the opportunity to analyse the data qualitatively as well as quantitively, whereas thematic analysis provides a purely qualitative account of the data (Gbrich, 2007:15; Braun & Clark, 2006:79).

Content analysis was deemed to be the most appropriate data analysis method because of the comparative nature of the study. The four short-term insurance companies and the two plain language practitioners follow different approaches to plain language. The data therefore had to be compared and quantified to gain a better understanding of the implementation of plain language as a strategic priority in these organisations. The content analysis process followed is explained in the paragraphs that follow.

Ten face-to-face interviews were conducted using two interview schedules; one for the short-term insurance representatives and one for the plain language practitioners. The interviews were recorded with the consent of the interviewees. Field notes were taken during the interviews. After each interview, the field notes were updated with a detailed summary of the interview.

Each voice recording was manually transcribed. After each transcription had been completed, the transcription was double-checked with the voice recording. It was a long and laborious process, but it was necessary for quality assurance and it also provided the opportunity to make initial observations about the research results.

The raw data was manually coded. During the coding process meaning was assigned to the participants' responses in the form of words or phrases. For each interview, the raw data was read and re-read and a code (i.e. a word or a phrase) was assigned to each separate idea in the participant's response.

The software program, QDA Miner Lite, was used to assist the manual coding process. Figure 4.2 is a screenshot that shows how the data was coded using QDA Miner Lite. The codes were colour coded, i.e. the codes that related to each other were marked in the same colour.

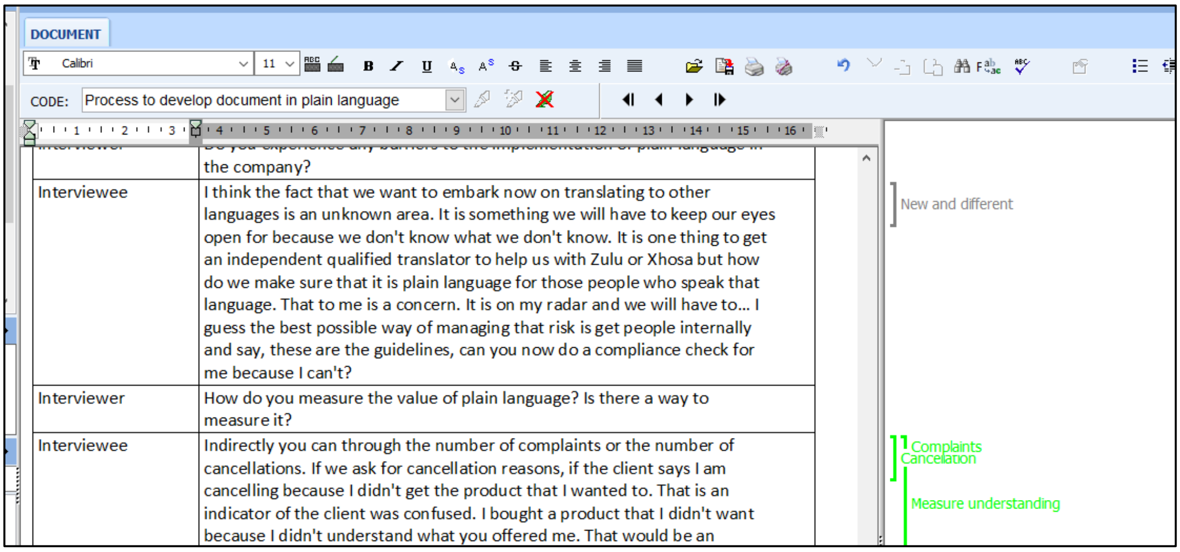

Figure 4.2: Example of coding in QDA Miner Lite

Once the raw data was coded for both participant groups, the 'Analyze' function in QDA Miner Lite was used to extract the code frequencies to Excel. Figure 4.3 is an example of the code frequencies in Excel. The data in Excel was used to create graphs of the code frequencies.

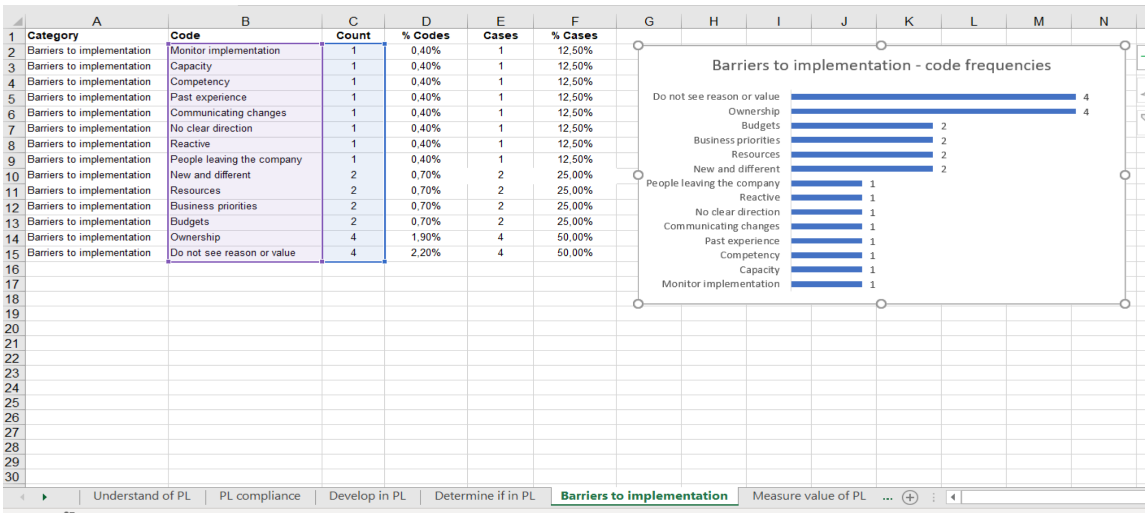

Figure 4.3: Example of code frequencies in Excel

The code frequencies and graphs were used to aid the discussion of the research results in Chapter 5.

4.6 SCIENTIFIC RIGOUR

Reliability, validity and objectivity are three important aspects to ensure that there is credibility (or rigour) in the research design of a study. Saunders *et al*. (2009:156) define reliability as “the extent to which your data collection techniques or analysis procedures will yield consistent findings”. Validity is concerned with whether the data collection instrument measured what it intended to measure (Clark, Riley, Szivas, Wilkie & Wood, 2000:126). Objectivity means that the researcher collected the data accurately and fully during the data collection stage, and that the data is free of any subjective selectivity (Saunders *et al*., 2009:194).

According to Noble and Smith (2015:34), qualitative researchers cannot use the same statistical methods as quantitative researchers to establish the reliability and validity of their research findings. Bryman and Bell (2015:44) suggest the following alternative criteria for qualitative research:

- Credibility (parallels internal validity);
- Transferability (parallels external validity);
- Dependability (parallels reliability); and
- Confirmability (parallels objectivity).

Since this study is qualitative of nature, the scientific rigour of the research design is discussed with reference to the four alternative criteria listed in the previous paragraph.

4.6.1 Credibility

Qualitative research findings are credible when the findings are an accurate representation of the participants’ perspectives and points of view (Noble & Smith, 2015:34). To ensure that the findings of this study reflect the true meanings of the representatives, the interviews were recorded, and detailed field notes were taken during the interviews. This allowed the researcher to repeatedly revisit the raw data to be able to check that the true meaning of the participants' responses is maintained.

4.6.2 Transferability

Transferability refers to the extent to which research findings can be generalised, i.e. transferred and applied to other situations or contexts (Thomas, 2010:320; Noble & Smith, 2015:34-35). The conceptual framework that was developed as a major recommendation for this study is not limited to short-term insurance companies and could also be tested for application in other organisations.

4.6.3 Dependability and confirmability

According to Thomas (2010:321), dependability is "the consistency of observing the same finding under similar circumstances". Noble and Smith (2015:34) state that confirmability means that the researcher's decisions are clear, consistent and unbiased, and that an independent researcher would come to similar conclusions (Noble & Smith, 2015:34). To achieve dependability and confirmability in the study, assumptions were clearly explained, and the interpretation of the results was done in an unbiased manner. It is believed that an independent researcher would reach similar conclusions.

4.7 RESEARCH ETHICS

Cooper and Schindler (2008:34) define ethics as "norms or standards of behaviour that guide moral choices about our behaviour and our relationships with others". Research ethics entail research that is conducted in a moral and responsible way for all parties involved. This means that the researcher must plan the research design, collect the data, analyse the data and discuss the research results in a manner that is both methodologically sound and morally defendable (Saunders *et al*., 2009:184).

For this study, the following ethical considerations were taken into account during the course of the research:

4.7.1 Integrity and objectivity

The necessary ethical clearance was obtained from the Faculty of Economic Management Sciences before the data collection phase of the study commenced. The ethics approval letter appears in Appendix C.

During the course of the fieldwork, the ethical guidelines prescribed by the University of Pretoria were followed and the interviews were conducted in an honest manner. The participants did not receive any form of incentive to take part in the interviews to ensure that integrity of the data was obtained. The interviews took place in the same, standardised manner and the participants' answers were not influenced or guided during the interview.

Furthermore, the results were interpreted, and the findings consolidated, in a way that demonstrates integrity and objectivity. The research results were not manipulated nor presented in a deceptive manner. If any form of researcher bias was present in the analysis of the data, or the consolidation of the findings, it was reported as such.

4.7.2 Anonymity and confidentiality

The short-term insurance companies and the representatives from these companies as well as the plain language practitioners were kept anonymous. No confidential or sensitive information was revealed which could lead to the representatives or plain language practitioners being identified.

4.7.3 Informed consent

Written permission was obtained from all the organisations that took part in the research. Before the interview was conducted, the participants completed an informed consent form that explained the purpose of the study and reassured the participants that their answers will be treated as strictly confidential and that they have the option to stop participating at any time without any consequences. The informed consent form used for this study appears in Appendix D.

Participation in the study was voluntary. The participants had the option to stop participating in the interview at any time without any consequences. In addition, the participant could choose not to answer a question.

4.8 CONCLUSION

The research methodology set out the strategy used to address the research objectives. The study followed the qualitative research approach. Interview schedules were used to conduct ten in depth, face-to-face interviews with eight organisational representatives and two plain language practitioners. The alternative criteria for qualitative research of Bryman and Bell (2015:44) was used to ensure scientific rigour in the research design. The following ethical considerations were considered during the course of the research: integrity and objectivity, anonymity and confidentiality, and informed consent.

CHAPTER 5

Results and interpretations

5.1 INTRODUCTION

The purpose of Chapter 5 is to discuss the results from the analysis of the data collected through face-to-face interviews. Figure 5.1 depicts the place of this chapter in relation to the entire dissertation.

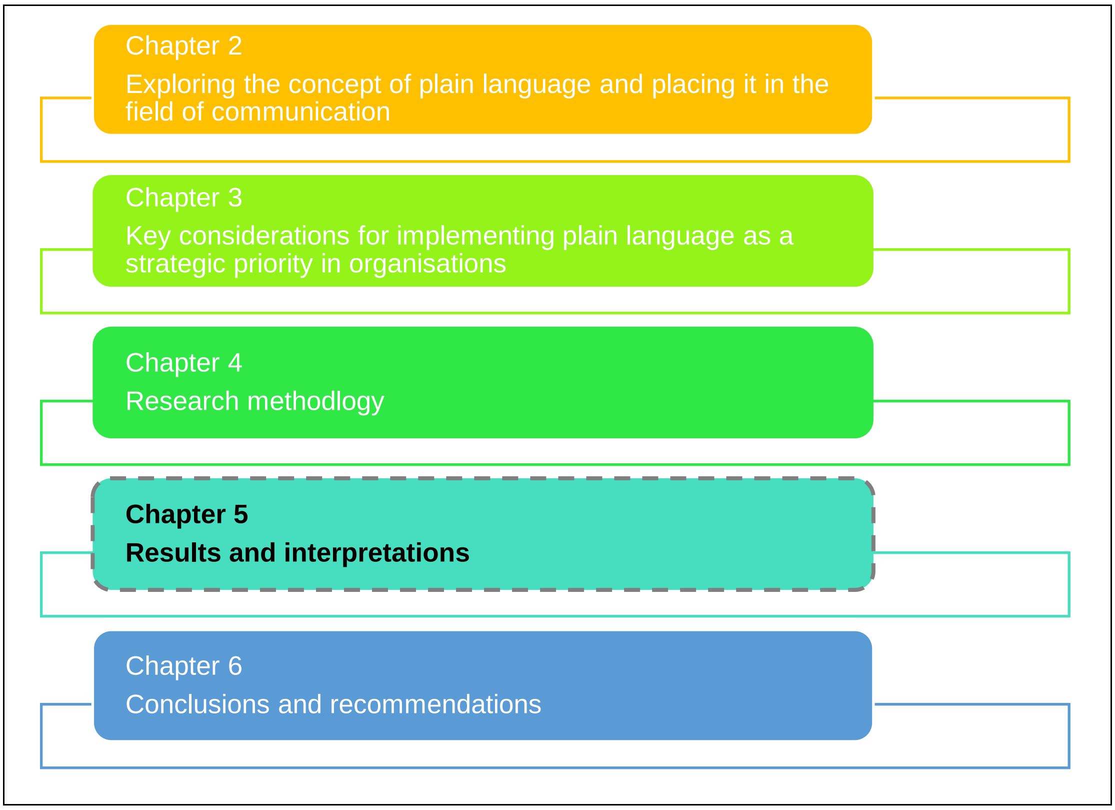

Figure 5.1: Chapter 5 in relation to the entire dissertation

5.2 RESULTS

The discussion of the research results is structured according to the research objectives of the study. The results for the two participants groups are discussed separately.

5.2.1 Organisational profiles and context of the interviewees

Due to the sensitive nature of the information disclosed in the interviews, the short-term insurance companies and their representatives as well as the plain language practitioners are kept confidential and anonymous in the discussions.

5.2.1.1 Organisations

Organisation 1 is a large global insurance company. In South Africa, the company has two licences, a long-term and a short-term insurance licence. The short-term insurance arm sells personal and commercial policies. The split between the two are equal. Organisation 1 has long-term relationships with large brokering houses and banks that sell their policies. The company recently launched a car and home insurance product that is sold by a partner company through a call centre and through a digital online channel.

Organisation 2 is a privately-owned insurance company that sells long-term and short-term insurance products in South Africa, the SADC (Southern African Development Community) countries, China and India. The company works with partners, intermediaries and brokers. They also have a small direct to customer business. The company’s main revenue is earned through selling commercial policies.

Organisation 3 sells its insurance products directly to customers and by means of a call centre, an App and online. This company’s initial focus was on short-term insurance, but later started focusing on other types of insurance, such as life insurance. Organisation 3 sells personal and commercial policies. The company has expanded its business globally in Africa, the UK, Australia and New Zealand.

Organisation 4 has a rich heritage as a short-term insurance company in South Africa. It is an intermediated and broker-based business. About 95% of the company's business comes through the broker channel. The remaining 5% is from direct business. The company sells more personal lines policies than commercial policies (two thirds personal and one third commercial), but the revenue is more from the commercial than the personal policies.

5.2.1.2 Positions and responsibilities of organisational representatives

Table 5.1 sets out the positions and key responsibilities of the organisational representatives.

Organisation	Representative	Job title	Key responsibilities
1	1	Head of life insurance TCF officer	Responsible for looking after the company's life insurance licence and ensuring compliance with the TCF (Treating Customers Fairly) requirements.
	2	Chief customer officer	Responsible for looking after customer experience and related aspects.
2	1	Head of customer team	Responsible for leading the company's customer team. There are three areas in this team, namely customer conduct, customer experience and quality monitoring.
	2	Project manager	Responsible for managing projects within the customer experience team. The representative was responsible for defining the customer principles for plain language and determining how it should be implemented in the company from a communication perspective.
3	1	Chief risk officer	Responsible for overseeing risk and compliance in the company. This includes Ombud complaints and quality assurance.
	2	Head of specialised claims	Responsible for leading the investigations, the building assessment and the vehicle assessment departments.
4	1	Communication manager	Responsible for the company's internal and external communication as well as media.
	2	Programme manager	Responsible for programmes across human resources (HR), marketing and customer experience. The representative was involved in plain language projects.

Table 5.1: Positions and key responsibilities of organisational representatives

5.2.1.3 Plain language practitioners

Practitioner 1 was first introduced to plain language in the late 1990s. She was working for a law firm in the UK when the EU's directive on plain language took effect. The law firm instructed her to find out what plain language is all about.

She also had a personal experience that opened her eyes to the importance of using plain language: "…at the law firm where a client had come to me for a will and a trust. He had been married, his wife passed away and he was getting remarried and he just wanted to make sure that his daughter was going to be looked after once he remarried. In the UK, they have a far more in community of property scenario. They don't like to have prenups as much as we do. He was an English-speaking man. English was his first language. He was well educated. He was a History professor. I took him through the will and the trust and at the end of it he looked at me and he almost had tears in his eyes. He said, 'I have no idea what you just said, but as long as you promise me that my daughter is taken care of under this, then I will sign'. For me that is unacceptable. It was one of those moments like this is not how the law should be".

Practitioner 1 returned to South Africa and started her company in 2004. The company offers the full range of plain language services. They conduct audits, develop documents in plain language and do training.

Practitioner 2's first company was founded in 1999. The company works in developmental communication and research. The company works mainly in the public sector. In the course of her work, Practitioner 2 encountered, several times, that she had to "translate" technical information, legislation or policy documents for a particular audience. "We were doing plain language work although we didn't realise it". She only realised that they have been doing plain language work when the Consumer Protection Act came out in 2008 and she looked at the definition of plain language. Practitioner 2 started a second company in 2009 to expand her plain language work to the private sector as well. The company offers a range of plain language services ranging from document development to training.

5.2.2 Objective 1: Strategic priorities

The representatives were asked questions about the strategic management, and in particular the strategic priorities, of their companies. The representatives' answers were coded, and the results are discussed in terms of the code frequencies. Where appropriate the codes are related to a specific insurer or representative.

5.2.2.1 Organisational representatives

- **Business strategy and strategic priorities**

Figure 5.2 shows the codes that emerged from the question on the company's business strategy and strategic priorities.

Figure 5.2: Business strategy and strategic priorities

The main codes were growth with 5 mentions and profitability with 3 mentions. The representatives particularly referred to growth in terms of expanding the business globally, "growing our people", getting more business on the books and creating new opportunities in the market.

Two representatives (from the same company) mentioned that there has been a lot of uncertainty in the company because of organisational and management changes. These changes have left the company without a clear business strategy. One of the representatives emphasised the importance of leadership with the following quote: "The company culture and the way the company is, is determined by who sits right at the top and what is happening there in that space".

The following codes also received two mentions: simplify ("…simplify the way you deal with us…" and "…simplify insurance for potential clients…"), innovate (in terms of being the first in the market with new and innovative products), best services (by treating customers fairly) and best products (value for money products). The codes agile, value adding products, customer-centricity, reinvent, remediate and key player were only mentioned once.

- **Different plans for different business units**

The representatives were asked if the company has different plans for different business units and how these plans relate to the company's business strategy. Figure 5.3 indicates the coded mentions.

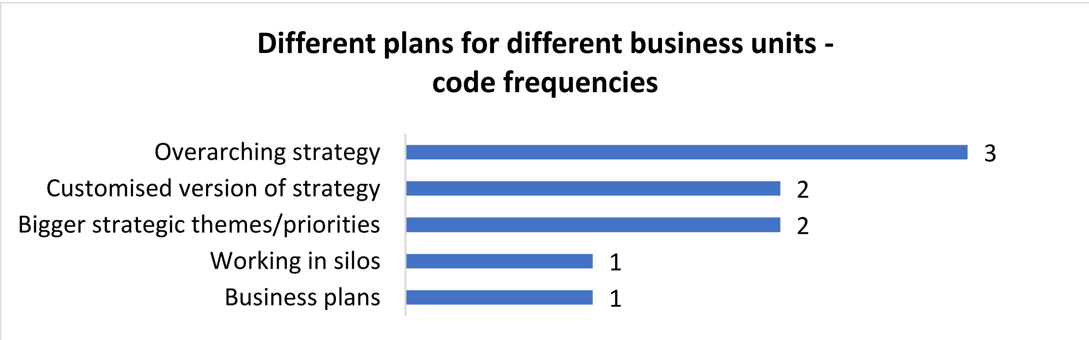

Figure 5.3: Different plans for different business units

The code, overarching strategy, was mentioned three times. One representative explained that “We have an overarching strategy for the company that will differ slightly in each area it is implemented…”. Another representative said that “The main strategy would filter through the different business units”. The two codes, customised version of strategy and bigger strategic themes/priorities, received two mentions each. Business units develop customised strategies based on the business strategy and the company’s bigger strategic themes and priorities.

One representative mentioned that business units have business plans but that the plans are focused inwardly. Thus, the different business units are working in silos.

- **Strategic planning and communicating strategic plans**

The representatives were asked about the extent to which strategic planning takes place in their company and how the strategic plans are communicated throughout the company. The representatives gave disparate answers that resulted in 28 codes. Figure 5.4 displays the 28 codes and the coding frequencies. Due to the high number of codes, the results are discussed separately for each company.

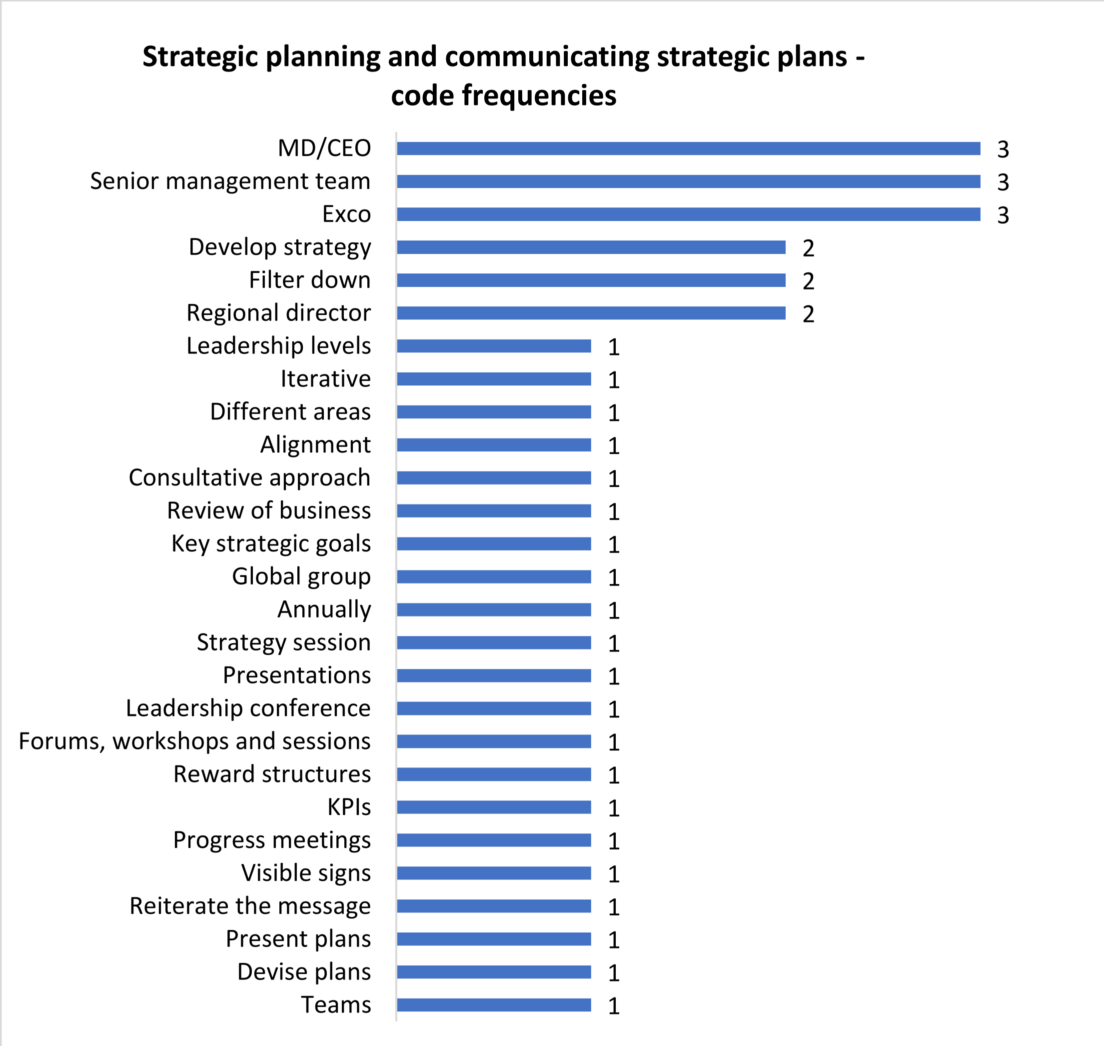

Figure 5.4: Strategic planning and communicating strategic plans

Organisation 1 has a strategy session annually. The global entity determines the company's strategic direction that gets filtered down to the regional director. The regional director does a full review of the business "to see where we are at, what our capabilities are, what is working, what is not working and what we need to do". Furthermore, the regional director communicates the strategic direction and passes down key strategic priorities to the company's Exco who is led by the Managing Director (MD). The MD develops a strategy using a consultative approach and reiterates the message to the senior management team (SMT). The SMT communicates the strategy to their teams. The teams devise plans and present the plans back to the SMT. One of the representatives explained the process with the following: "We got a direction and then we align to it and then the detail of the implementation will sit in the different areas and that aligns eventually to the MD strategy. It is a to-and-fro process. It is very iterative…”.

At Organisation 2 strategic planning takes place at the top with the CEO and gets filtered down to the employees. “A lot of planning at the top and then the staff gets informed of the new mandates and the new structure”. The company purpose and strategy are communicated to the different business units in a number of ways. There are visible signs of the strategy throughout the company. The purpose and strategy are communicated to the employees through forums, workshops and sessions. The SMT holds progress meetings to give feedback in terms of their achievement of the purpose and strategy. Lastly, the company has consolidated their purpose and strategy into six outcome-based goals, which could also be called strategic priorities. Under each outcome-based goal there are specific key performance indicators (KPIs). The KPIs are linked to the reward structures of the executives so that at the end of the year how well they do in achieving those six outcome-based goals and how well they do in achieving all the indicators heavily informs their reward for their businesses.

Each executive member from Organisation 3’s has been given the task to think about the year ahead and develop a strategy. These strategies are presented to the Exco and all the strategies are documented. The strategies are then presented to the Board for their approval. The approved strategies are communicated to the SMT at a leadership conference. The SMT in turn communicates the strategy to the different leadership levels such as the general managers and the team managers who are responsible for implementing the strategies in their respective business unit teams.

The question was not posed to the representatives from Organisation 4 because of the organisational uncertainty that the company finds itself in.

- **Strategic stakeholders**

When the representatives were asked: "Who are the company's most important strategic stakeholders?", the main code with four mentions were brokers. "We do a lot of business with brokers…", said one representative. Another representative said the following, emphasising the role of the customer: "I think up and until now it has been the broker, but seeing the industry changing and the change that has been forced by legislation, I think it is going to become the policyholder, the customer".

The following codes received three mentions: customers ("We don't exist without them."), the regulator ("…there is a lot of changes happening there now…") and employees ("…the people actually doing the work…"). Figure 5.5 shows that several codes received fewer than three mentions.

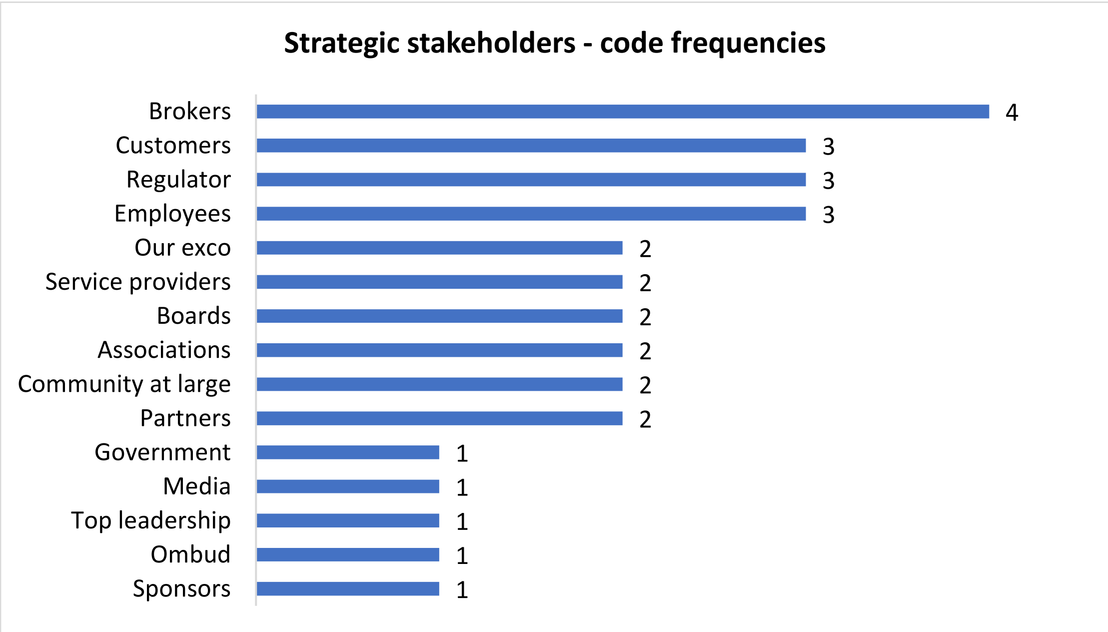

Figure 5.5: Strategic stakeholders

- **Maintaining stakeholder relationships**

The representatives gave a number of different answers when they were asked how their companies maintain relationships with their strategic stakeholders. Figure 5.6 shows the code frequencies.

Figure 5.6: Maintaining stakeholder relationships

The main codes were client engagement, no strategic communication and misalignment with two mentions each.

Organisation 1 has a client engagement team that focuses on building relationships with the company's top 100 corporate customers. One of the representatives said that the team "is very transactional. I am not sure if outside the transactional environment, we do anything". The same representative mentioned that there is no strategic communication with the company's employees and that there is a misalignment between the strategic goals of the management of the global entity and that of the employees.

A representative from Organisation 2 painted a similar picture of their company with the following statement: “There is no strategic communication towards those people that actually needs to speak to customers or inform them. I think that is the misalignment between the top and the bottom”.

A representative from Organisation 3 emphasised the importance of keeping employees updated in terms of what the company’s goals and objectives are and the strategy. The company has different people that are responsible for maintaining external stakeholder relationships. For example, the head of Marketing and Public relations looks after the relationship with the media.

According to a representative form Organisation 4, they do not have a structured way of maintaining stakeholder relationships. They do however have a strong distribution team that looks after their relationships with brokers.

5.2.3 Objective 2: Plain language needs of customers

The representatives were asked general and specific questions about the plain language needs of customers. Two of the general questions were also asked to the plain language practitioners.

5.2.3.1 Organisational representatives

- **Factors that influence broker/customer’s choice of insurer**

The representatives were asked the following general question: “When a customer or a broker chooses an insurance company, what are the main factors that influence their decision?”. The main codes with six mentions each were confidence in claims payment and price. One of the representatives noted that price would be more important for an entry level customer who is new to insurance than a customer who has had insurance for some time. For these experienced customers the payment of a claim would be more important than price.

The following codes had four mentions:

- service ("…customers do look how they were treated by the agent and what their experience with the specific individual was and whether there was a connection with the agent or the salesperson that engaged with them…" and "…how you make them feel special.");
- trust ("…don't want to feel like you are ripped off or paying too much for it.");
- reputation ("…most people have heard war stories…"); and
- claims experience ("…if you claimed before and you have had a good or bad experience that also determines how you choose your insurer.").

The code, referrals, received three mentions. The representatives said that customers will listen to what their family, friends and colleagues have to say about their experiences with different insurance companies.

The remaining codes, as displayed in Figure 5.7, received two or fewer mentions.

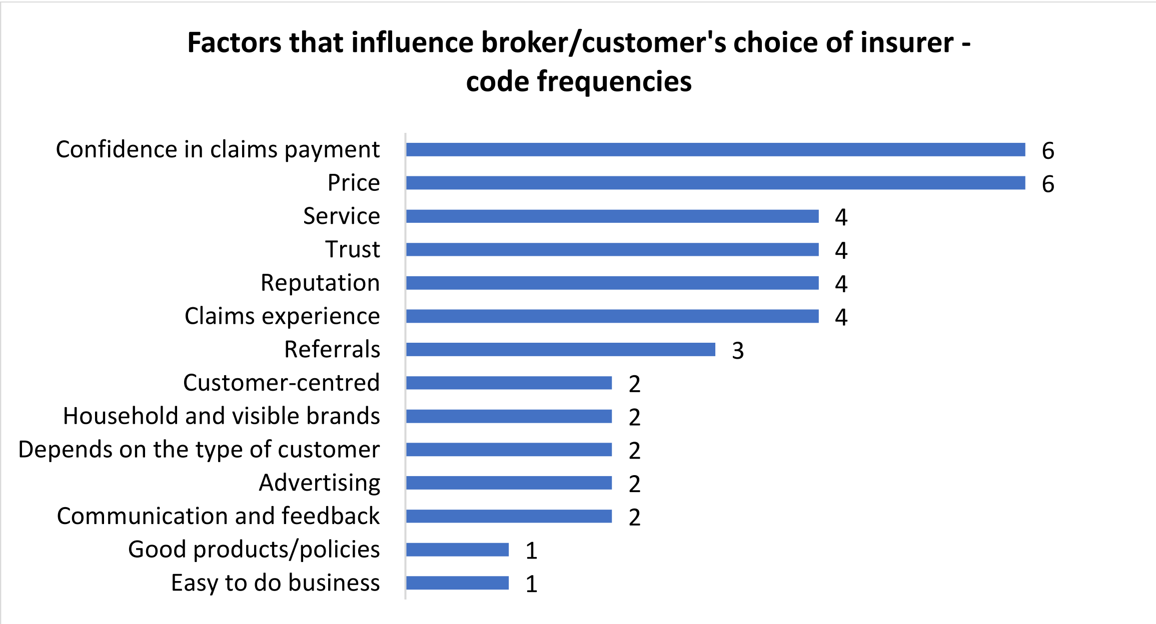

Figure 5.7: Factors that influence broker/customer's choice of insurer

- **Ideal relationship between insurer and customers**

The representatives were asked how they would describe the ideal relationship between an insurer and customers. Figure 5.8 shows that the main code was engaged relationship with six mentions.

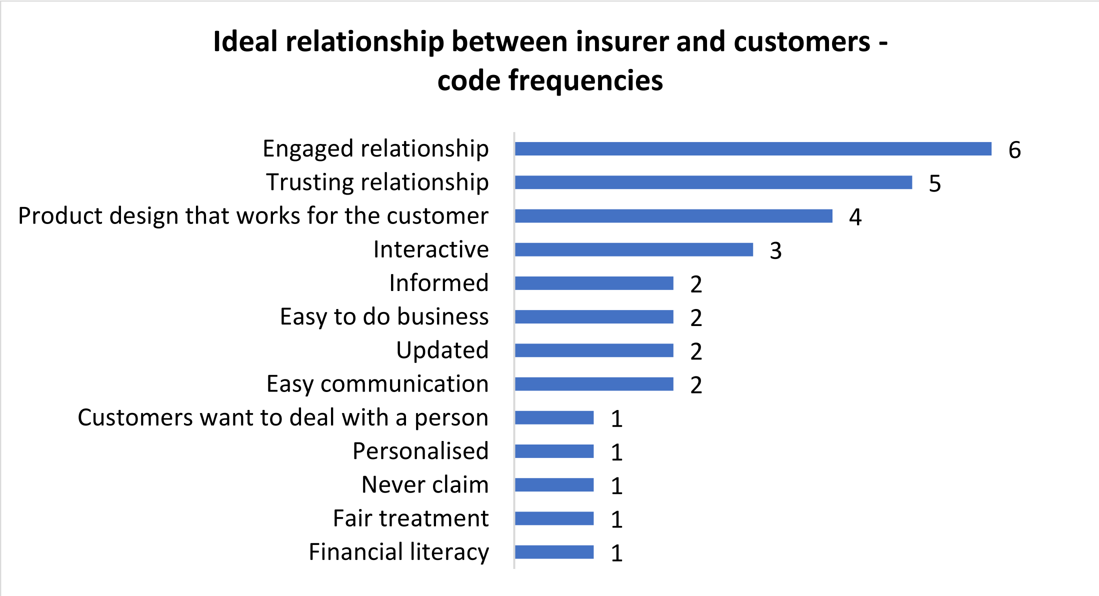

Figure 5.8: Ideal relationship between insurer and customers

According to the representatives, an engaged relationship involves engaging with the customer more than once a year, helping customers to solve their problems and achieve their goals, having a servant relationship with customers and having a relationship with the customer like you would have with a friend. Trusting relationship was coded five times. A trusting relationship comprises the following:

- the insurer becomes indispensable and the preferred brand that customers trust; and
- customers feel comfortable with the products that the insurer provides.

The code, product design that works for the customer, received four mentions. One of the representatives said the following about product design: “People in their mid-twenties are going to have a very different view of what they want a product to do, behave and provide than somebody that is 60. The challenge of insurers is to have a broad enough spectrum of products available through various distribution channels to safeguard that they can attract the various customer segments. It is risky to focus only on one segment". Another representative added that product design works for the customer if there is no misalignment between what the insurer promises and what the customer experiences. "The ideal relationship is not what works for the insurer, it is what works for the customer".

Three representatives said that the ideal relationship is interactive. The codes, informed, easy to do business, updated and easy communication, were mentioned twice.

- **Customer retention**

The representatives were asked what their company does to retain its customers. The codes and frequencies for customer retention are displayed in Figure 5.9. The results are discussed separately for each insurer.

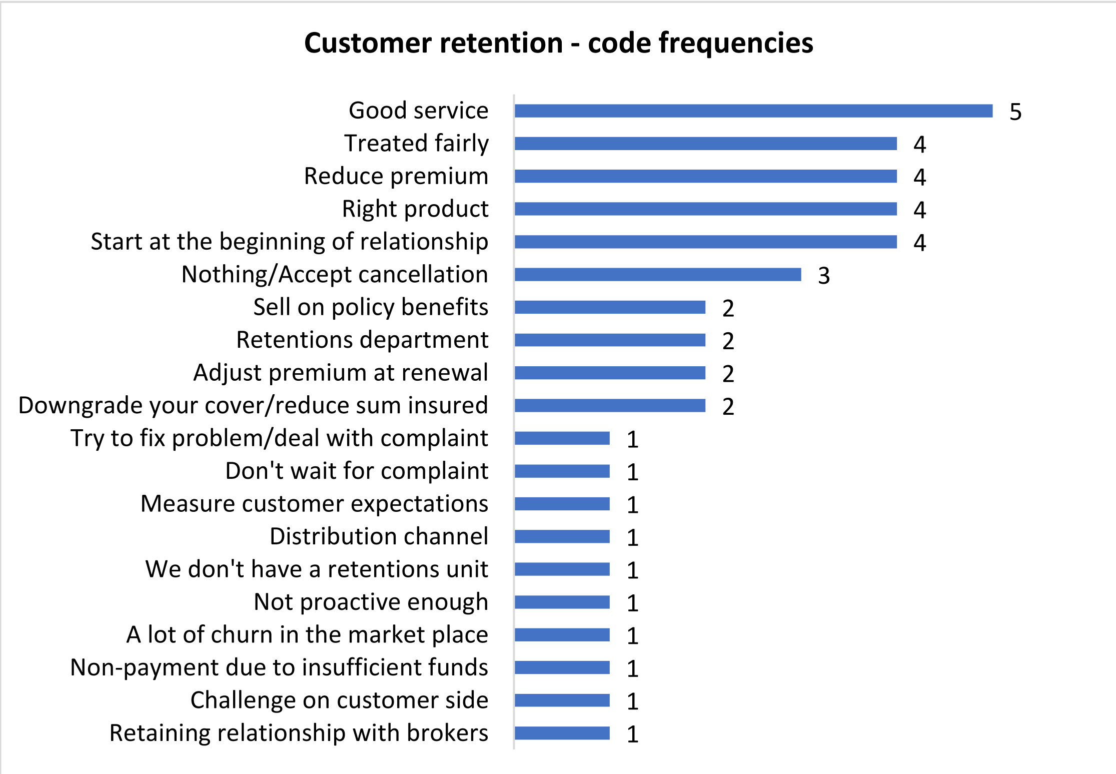

Figure 5.9: Customer retention

Representative 1 from Organisation 1 said that on the broker’s side, it is important to retain relationships with brokers because they are the go-between between the insurer and the customer. However, it is a challenge on the customer side, because the bulk of customers’ non-payment is because of insufficient funds. This makes retention difficult because people want and need policies, but it is difficult for them to keep up their premium payments. This also leads to a lot of churn in the market because customers shop around for the lowest premiums. It is possible for insurers to downgrade cover or reduce the sum insured to save on premiums.

According to Representative 2, the company does not have a retentions unit. If a customer wants to cancel their policy, the company does nothing to retain the customer. The representative added that: “I think we do bargain (adjust the premium) at renewal to try and retain the business, but I don't know of anything proactive enough that we do as an insurer to try and retain customers”.

The first representative from Organisation 2 said that customer retention starts at the beginning of the relationship by making sure that you sell the right products to the right customers. “Our retention efforts start early on; it starts with developing the right value proposition for the right customer and making sure it is distributed in the right way in a channel that is the most easily accessible or the most appropriate for that customer. One thing that we do get right, is when customers express any form of dissatisfaction, we jump on it and we tend to be really good at turning dissatisfied customers into advocates again when they do express dissatisfaction, or they complain. So even before the risk is there that they will leave because of poor experience or we didn't meet their expectations” (The following codes are relevant to this quote: good service; treated fairly, distribution channel and try to fix the problem/deal with complaint). In some cases, the company does nothing and accepts the cancellation.

The second representative was not as positive about the company and said that in most cases the company does nothing and accepts the cancellation. However, for car insurance, the company will reduce premiums, downgrade the cover or reduce the sum insured.

Customer retention is very important for Organisation 3 because the company sells their products directly to customers without the help of brokers or other intermediaries. Representative 2 summarised the importance of retention with the following: “Our customers come on the books and it is a serious acquisition cost that we have to pay off. All of our marketing and our calls centres cost a lot of money. You probably break even on profitability at about month ten with no claims. It is super important for us to retain customers”.

Representative 1 said that in terms of retentions, one can be proactive, and one can be reactive. Proactive retention starts at the beginning of the relationship where the company make sure that the customer gets the right product. The company ensures that the service is good, the customer is treated fairly and if there is a claim, the company does not wait for the customer to complain. The company also adjusts the premium at renewal of loyal customers who have been with the company for many years. Reactive retention takes place when customers are approached by other insurance companies that offer better premiums. When the customer wants to cancel their policy, the Retention department will reduce premiums, remind the customer of the company’s good service and the benefits of the policy. “…we work very hard to get our customers and we don't want to lose them”.

Representative 1 said that Organisation 4 relies on its claims paying ability, rich heritage and good service to retain customers. The representative said that the company should do more to attract new customers, especially the younger generation. Representative 2 said that retention starts at the beginning of the relationship by offering good value for money. It is important for the company to carefully manage the price of insurance (coded as reduce premiums). Furthermore, the company ensures that customers are treated fairly, offered the right products and receives good service.

- **Customer's understanding of their insurance contract**

The representatives were asked the following question: "Do you think your customers have a good understanding of their insurance contract?". The codes and code frequencies are displayed in Figure 5.10.

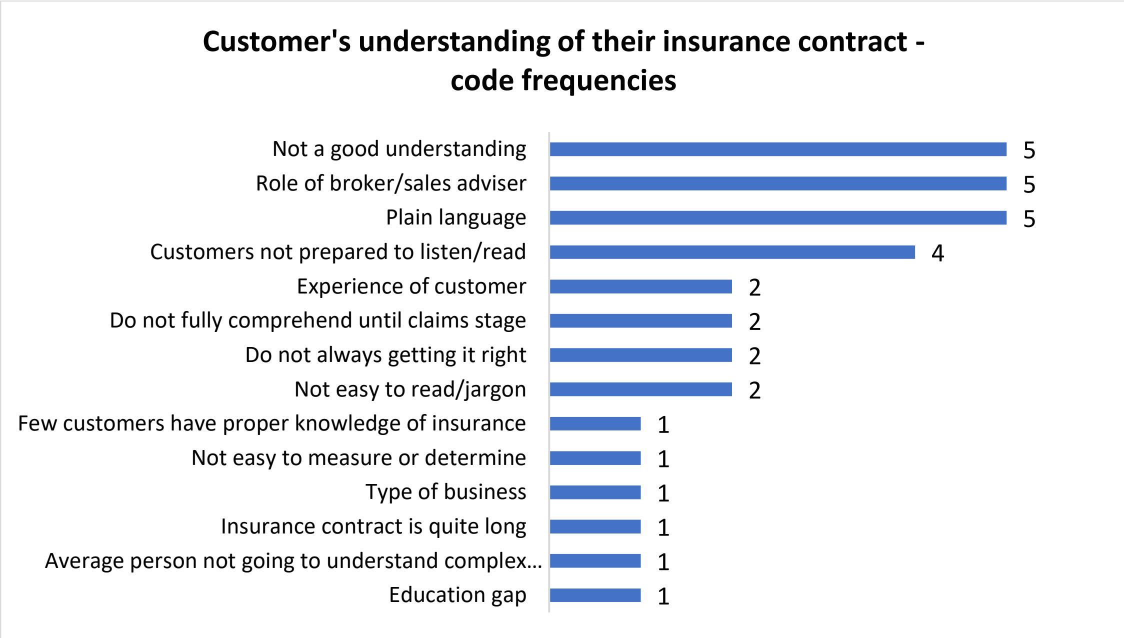

Figure 5.10: Customer's understanding of the insurance contract

Five out of the eight representatives said that they do not think that customers have a good understanding of their insurance contract. The representatives gave the following reasons for their answer:

- Customers are not prepared to listen or read (four mentions);
- Insurance contracts are not easy to read, and insurance has a lot of jargon (two mentions);
- Customers do not fully comprehend until claims stage (two mentions);
- Few customers have proper knowledge of insurance (one mention);
- It is not easy to measure or determine if a customer understands (one mention);
- Understanding depends on the experience of the customer (two mentions) and the type of business (one mention);
- Insurance contracts are quite long (one mention);

- The average customer will not understand complex insurance products (one mention);
- There is an education gap amongst customers in terms of their understanding of policy benefits and terms and conditions (one mention).

According to the representatives, it is the broker or sales agent's role (five mentions) to try and explain the policy benefits and terms and conditions to customers and to answer their questions.

Five representatives mentioned plain language in their answers. They said the following:

- "…we've got policy wordings in plain language…that has been extremely successful";
- "No (I don't think our customers have a good understanding) … I guess that is where the plain language comes in";
- "If I look at it from a plain language perspective, we have done a lot of work to make sure that we are clear and upfront, and that the customer knows what they bought…";
- "…our products are, in our minds, fairly simple. We believe that it is not difficult for customers to understand"; and
- "Our personal lines have a relatively plain language policy".

Two representatives admitted that their companies do not always get it right in terms of plain language.

- **Broker's understanding of the insurance contract**

The representatives were asked how they would rate brokers' understanding of insurance contracts. Figure 5.11 shows that two representatives said that most brokers have a good understanding, especially those who have been in the industry for a long time.

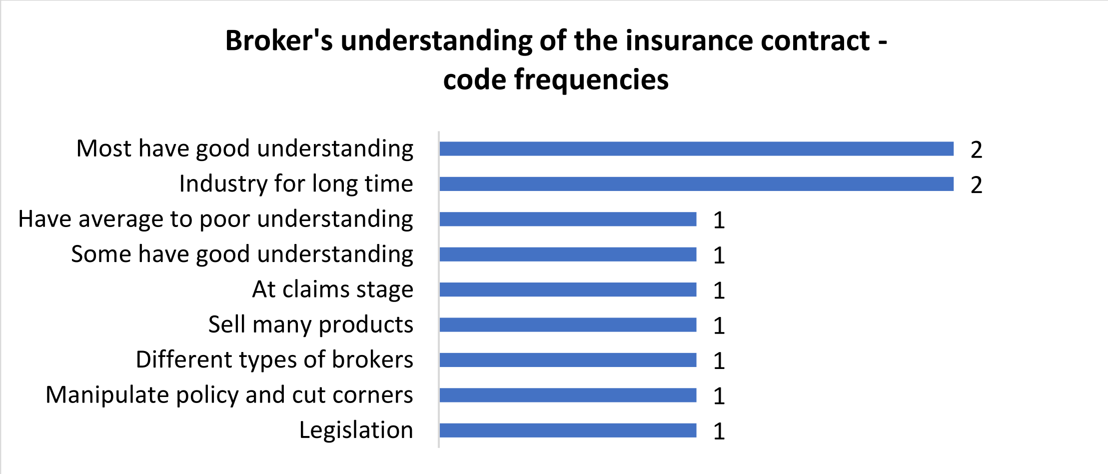

Figure 5.11: Broker’s understanding of the insurance contract

The following codes received one mention:

- Have average to poor understanding because they sell many products: “…the broker is not only selling our products; the broker is selling many other products and to understand the nuances of all the products well is very difficult”;
- Some have good understanding: “You have very good brokers that know their stuff, you have so-so brokers and you have a lot of brokers out there that are just selling for the sake of making money”;
- At claims stage: “Where the broker, like the customer, finds out what the policy wording really says, is at the time of a claim when all parties now unpack the policy wording”;
- Different types of brokers: “There are different brokers that understand different areas of insurance differently and less well. Commercial insurance is way more complicated than personal insurance, so you need a specific broker to understand that well”;
- Manipulate policy and cut corners: “…they can actually manipulate the policy so that it works in their customer's favour. They know the legislation and how to cut the corners”;
- Legislation: “I think a lot of the legislation that has been put in force to try and stop what was going on has had limited effect. The insurers get scrutinised very aggressively but there is a lot of brokering houses and brokers that don't”.

- **Measuring customer experience**

The representatives were asked about the measures that their companies have in place to measure customer experience. The codes and code frequencies are presented in Figure 5.12.

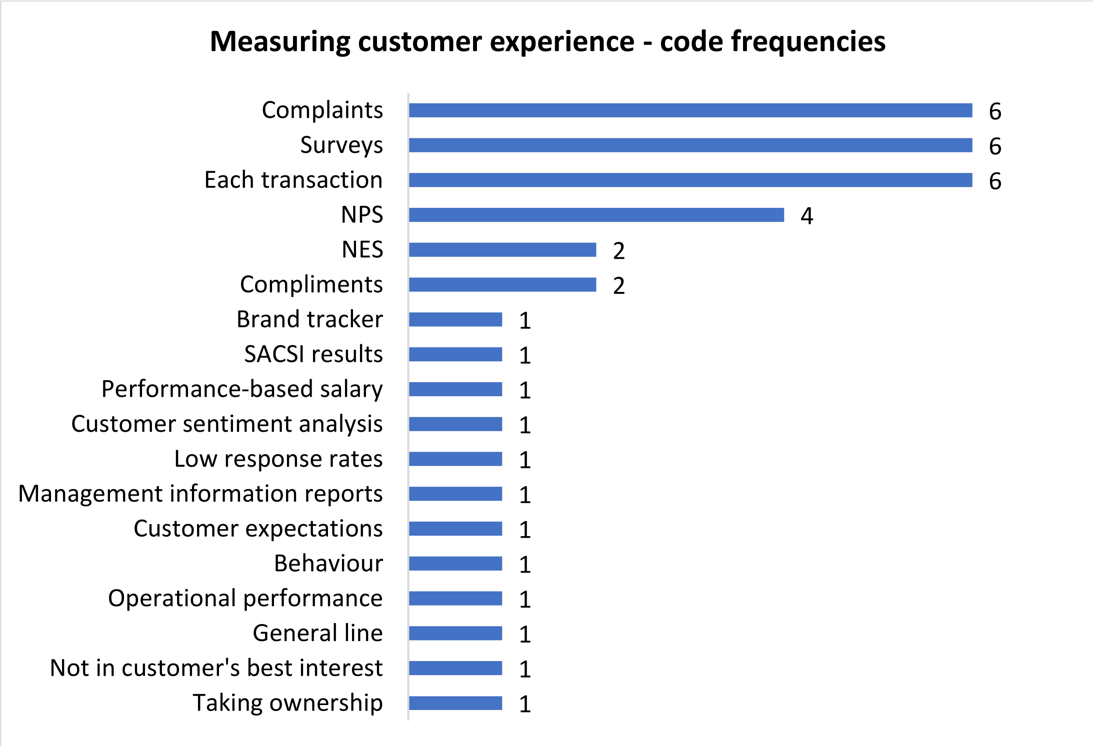

Figure 5.12: Measuring customer experience

The main codes were complaints, surveys and each transaction with six mentions each. All the insurers have a complaints line and a Complaints department that deal with the complaints that are submitted. Two representatives mentioned that they also receive compliments on the line.

The insurers also send a survey to the customer or the broker after each transaction. The surveys test the customer’s experience at different touchpoints along the customer’s insurance journey. Representative 1 from Organisation 3 said that they send a survey even after the customer has had an experience with a service provider, because they also want to know how customer’s experience was with the service provider. They see the service provider as an extension of their service. Representative 2 from the same company said that the surveys' response rates are low at about 15-20%.

Four representatives mentioned NPS (Net Promoter Score). NPS is the first question that Organisation 1 asks on their survey, namely "How likely are you to recommend this company to your friends, family and colleagues?". Organisation 2 measures customer loyalty and behaviour from an attitude perspective through NPS. Organisation 4 said that they only do the NPS with customers that contact them directly (i.e. not through a broker).

The remaining codes that received one or two mentions are discussed separately for each insurer.

Organisation 1's first representative expressed a concern in terms of customer experience with the following quote: "One of our challenges in-house is we have a long legacy and we have a lot of incumbent staff that are used to doing things a certain way that is not necessarily in the customers best interest. We are trying to change people's way of doing things as well. The biggest challenge is getting people to take ownership. If you commit to do something, do it. If you say you are going to phone the customer back, phone the customer back". The second representative said that the company also has a general line for customers who just want to talk to the business. However, the line is not very active.

Organisation 2 measures customer experience from a transactional or experience level. Internally, the company looks at operational performance in terms of operational controls and whether they are doing a good job delivering for customers operationally. The company also measures customer expectations and behaviour.

Organisation 3 runs management information reports where they link different departments, teams and individuals to a customer's experience. "…we analyse because we want to understand where the service is better and where it is worse and what we should do about that". They do customer sentiment analysis where they go through complaints to assign a specific category to a customer's unhappiness. The company also has performance-based salaries where an employee's salary will depend on customer experience indicators.

Organisation 4 measures the brokers on what they call the NES (Net Effort Score). "…how easy was it to complete a transaction with us…". They also take into account the SACSI (South African Customer Satisfaction Index) results. SACSI is an annual satisfaction survey that is conducted by an independent company. The company also tracks their brand on an annual basis.

5.2.3.2 Plain language practitioners

- **Factors that influence broker/customer's choice of insurer**

The plain language practitioners were asked the following general question: "When a customer or a broker chooses an insurance company, what do you think are the main factors that influence their decision?".

Practitioner 1 indicated that price plays a big role especially in short-term insurance. "…it is not a long relationship that you are going to have with the company like a life insurer". She also referred to a study done by Ipsos Markinor that indicated that the understanding of a policy, i.e. the actual language of policy, was a big driver of customer loyalty. Practitioner 1 said that the understanding of the policy is a key retention element.

Practitioner 2 answered the question by referring to two types of businesses in the insurance industry, namely direct business and broker business. In terms of direct business, Practitioner 2 conducted a focus group for a client with a group of customers. Reputation was important for that group of customers. "They would tend to go to your established companies that have been in the market for a long time and that they trust". She also speculated about the role of price with the following quote: "I am not sure if they would shop around between reputable companies and then decide on one that gives them the best package for the best price".

In terms of broker business, Practitioner 2 said that many customers have a long-term relationship with brokers and rely heavily on the advice of their broker. She has had conversations with brokers regarding the basis on which they would recommend a policy to customers and found the following: “Their preference is based on the service that they get from the insurer. If the insurer is giving them trouble and is not responsive, it is irritating for them and they would rather go with another insurer. I also specifically asked about the attractiveness of a policy document, the ease to navigate through it, how easy it is to get a grip on what it is this policy provides you, or not, and that does play a role for brokers”.

- **Ideal relationship between insurer and customers**

The plain language practitioners were asked how they would describe an ideal relationship between an insurer and customers.

Practitioner 1 described the ideal relationship in terms of a level negotiating plane: “You, the insurer, want my business and I want to know you are going to pay out when something happens. A balance of those two. In terms of the relationship, I understand what you are saying to me, you understand what I am saying to you. My claims get processed quickly, there is no questions”. She also added that the company should be responsive to their customers and that it is very important for companies to have knowledgeable advisers who customers can talk to.

Practitioner 2 said that insurers do not want customers to claim. “The fewer claims the insurer gets the happier they are”. She explained that the opposite is true for customers with the following statement: “Your customer is paying premiums over months, over years, and when they do have a situation when they have to claim, they want the insurer to pay that claim… Also, from a customer point of view, responsiveness on the part of the insurer is very important”.

5.2.4 Objective 3: Approaches to plain language implementation

The representatives were asked specific questions about the implementation of plain language in their companies. The practitioners were asked general questions relating to how they assist their clients with the implementation of plain language. The representatives' coded answers are discussed in the next section.

5.2.4.1 Organisational representatives

- **Understanding of plain language**

The representatives were asked to explain their understanding of the term plain language. Figure 5.13 shows the codes and code frequencies.

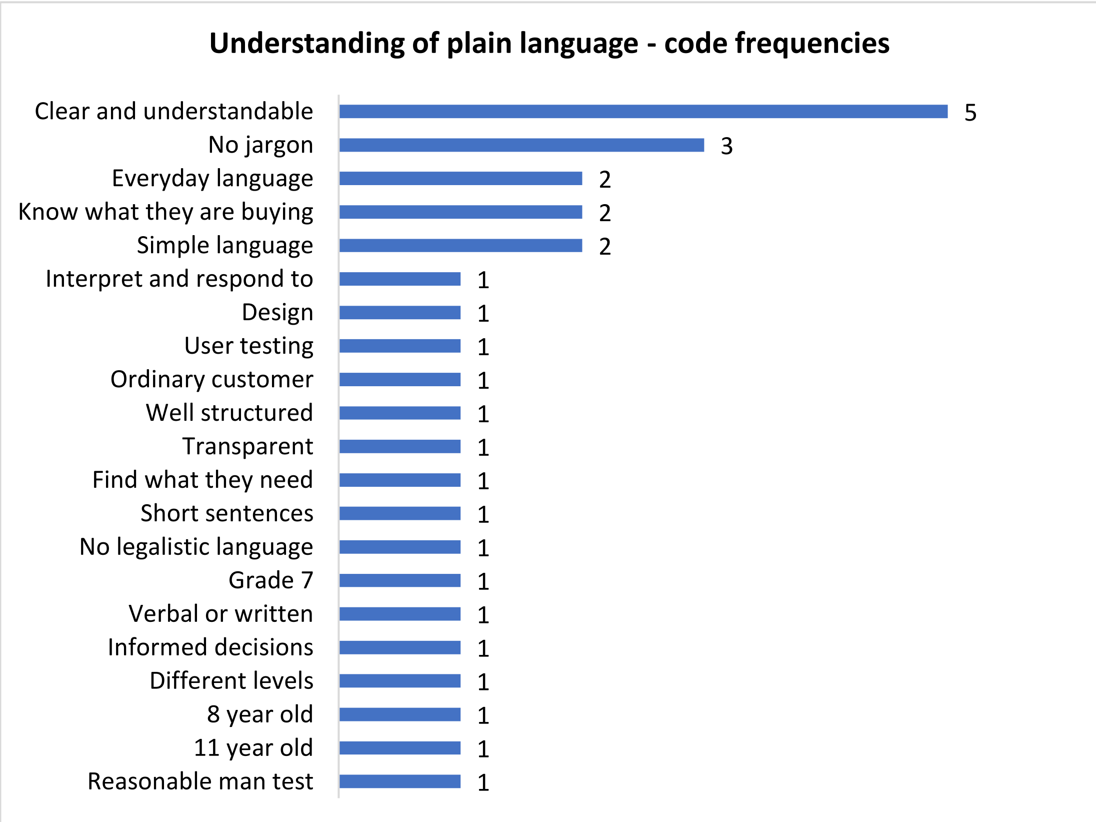

Figure 5.13: Understanding of plain language

The main code, with five mentions, was clear and understandable. One of the representatives explained plain language as making sure that the customer, or person being communicated to, can clearly understand what you are communicating.

The code, no jargon was mentioned three times. According to the representatives, no jargon involves “not using lots of technical jargon that the average man in the street wouldn't understand”, “use ordinary, everyday, commonly understood terms for commonly understood things” and “don’t use formal terminology or formal language”.

The codes that received fewer than two mentions are summarised per insurer and per representative in Table 5.22.

Organisation	Understanding of plain language
1	According to Representative 1, plain language is simple language. It involves simplifying things to make it more understandable and transparent for the customer. Customers should know what they are buying. “It is the reasonable man test. In the UK, in some instances, they have given the policy wording to 11-year-olds and said if a 11-year-old understands it then you have done your job”.
	Representative 2 defines plain language as “simple language, everyday language. Theory says the test is an 8-year-old. If an 8-year-old can understand, it is in simple language”.
2	For Representative 1, plain language is when customers know what they are buying. The outcome of plain language is customers who make informed decisions. Plain language applies to verbal and written communication and plain language takes place at different levels. For example, “if you are speaking to the CEO you are not going to dumb it down to Grade 2 English because it is not necessary, but when you are speaking to the mass emerging market, you can't be speaking academic English because it is not what they understand, it is not the language that they interact with”.
	Representative 2 said that: “We put a rule as part of the plain language principles to drop the level of understanding to a Grade 7. So, when you communicate with that person always think of: ‘do they understand what you are telling them’ ”.
3	Representative 1 defines plain language as everyday language. Plain language means using short sentences and not using any legalistic language. “The moment that you use words that that we normally don't use in conversation, you are stepping on thin ice. You are sounding like a lawyer. If you sound like a lawyer, it is not plain language”.
	For Representative 2. plain language is using everyday language, i.e. “use ordinary, everyday, commonly understood terms for commonly understood things”.
4	Representative 1 explained that plain language is the ability to write something in a manner that an ordinary customer can easily see what you are talking about and if they are looking for something specific in the text, they can easily find what they need. Documents in plain language are well structured and the document is well designed. The only way to know if a document is in plain language is to conduct user testing. “Sometimes we think for ourselves that ‘Okay, great I think that this document looks good. I think it is clear and to the point and it is well structured. People can easily see what you are talking about. They won't really have any more questions afterwards and they will not be confused’. But we can't just think that for ourselves, we need to ask them and test”.
	For Representative 2, plain language is “language that the recipient understands, interprets well and can respond to”.

Table 5.2: Representatives’ understanding of plain language

- **Ensuring plain language compliance**

The following question was put to the representatives: “How does your company ensure compliance with the regulatory requirements of plain language?”. The main codes and other code frequencies are displayed Figure 5.14, but the results are discussed separately for each insurer.

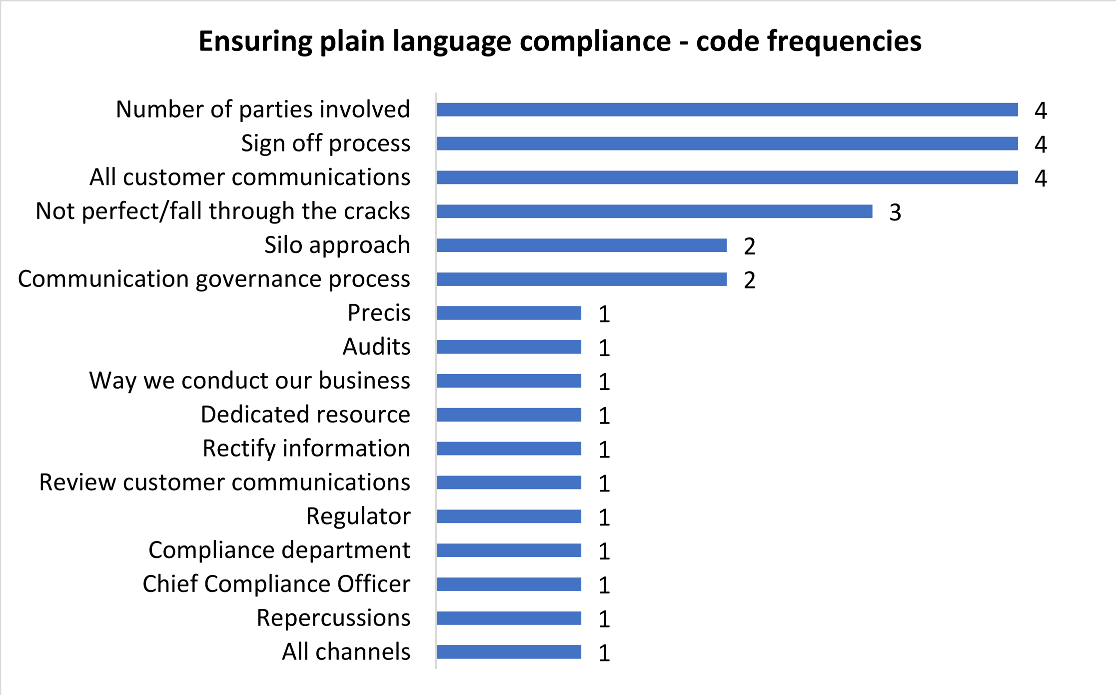

Figure 5.14: Ensuring plain language compliance

Organisation 1 has an aggressive sign off process for all their customer communication such as policy wordings, scripts and marketing material. A number of parties are involved in the sign off process including the business itself, the KI (key individual) for the business, Compliance and Legal. The communication goes through all the channels to ensure that it meets the regulatory requirements. Representative 1 admitted that the company is not perfect and that things fall through the cracks. They have now put a more stringent process in place to make sure there are repercussions if people do not follow the correct procedures.

Representative 2 who is the Chief Customer Officer said that the Customer department is not involved in the implementation of plain language. The company relies on the Chief Compliance Officer and the Compliance department to keep them updated on any changes from the Regulator and in the regulatory environment. They therefore follow a silo approach.

Organisation 2 uses a communication governance process to ensure that the company's communication complies with the regulatory requirements of plain language. The governance team consists of number of parties including a customer experience expert, an operation expert, a legal expert and a product person that is involved in product design. The team will review customer communication to make sure that it is appropriate for the target audiences and that the document does not contain any jargon or information that could be misleading or misunderstood. A sign off process is part of the governance process that is applicable to all customer communication (call scripts, letters, policy schedules and wordings, SMSs and emails).

Representative 1 acknowledged that the company is not perfect. "If we become aware that something has happened or that something seems to be unclear or misleading or vague, we will go back and review it through that same communication governance process, get it signed off and rectify the information to the customers". Representative 1 admitted that the governance process is cumbersome and not accepted by everyone in the company: "We are getting mixed feedback to that type of governance approach, but it is probably the only way to do it to make sure all those role players connect around this communication".

The Compliance department of Organisation 3 has a dedicated resource that looks after all their policy documents, which includes policy contracts and all customer communication. When changes are made to policy wordings, the dedicated resource goes through a process to make sure it complies with plain language requirements. The policy wording then goes through a sign off process where a number of parties are involved in. Representative 1 said that another way for the company to ensure plain language compliance is through the company culture. "We are a relaxed environment… We don't use formal correspondence… The way we conduct our business is by using plain language". Representative 2 added that the company mostly tries to communicate in plain language, but that the company is not perfect and can do better.

Organisation 4 mainly follows a silo approach. Representative 1 explained the silo approach as follows: "Each of the different areas have basically a responsibility to do what they need to do from a legal point of view. There are contracts and all of that in place per area that they must adhere to. It is the key people in each different area's responsibility, from a holistic point of view, to make sure that they comply to whichever Acts or whatever they need to comply to in that area. So, they can use the services they need in the business and all of that to assist them, but it is their responsibility to make sure that they comply". The representatives also mentioned that the company conducts communication audits and that the company writes precis of long documents.

Representative 2 explained the company's attitude towards plain language as follows: "So, the guys here are kind of looking and saying, 'Well, what you want us to do is to precis it. Let's call it a precis, let us not call it plain language. Let us call it what it is, because if we call it plain language, suddenly you want to start changing the meaning of wordings and fixing things that aren't broken. So, let us not do that, maybe we can just precis it a bit' ".

- **Process to develop document in plain language**

The representatives were asked about the process that the company follows to develop a new document in plain language or to convert an existing document into plain language. Figure 5.15 shows that the main codes are review and adjust (seven mentions), sign off (four mentions), meeting (four mentions) and product owner (four mentions).

The detailed results are discussed separately for each insurer.

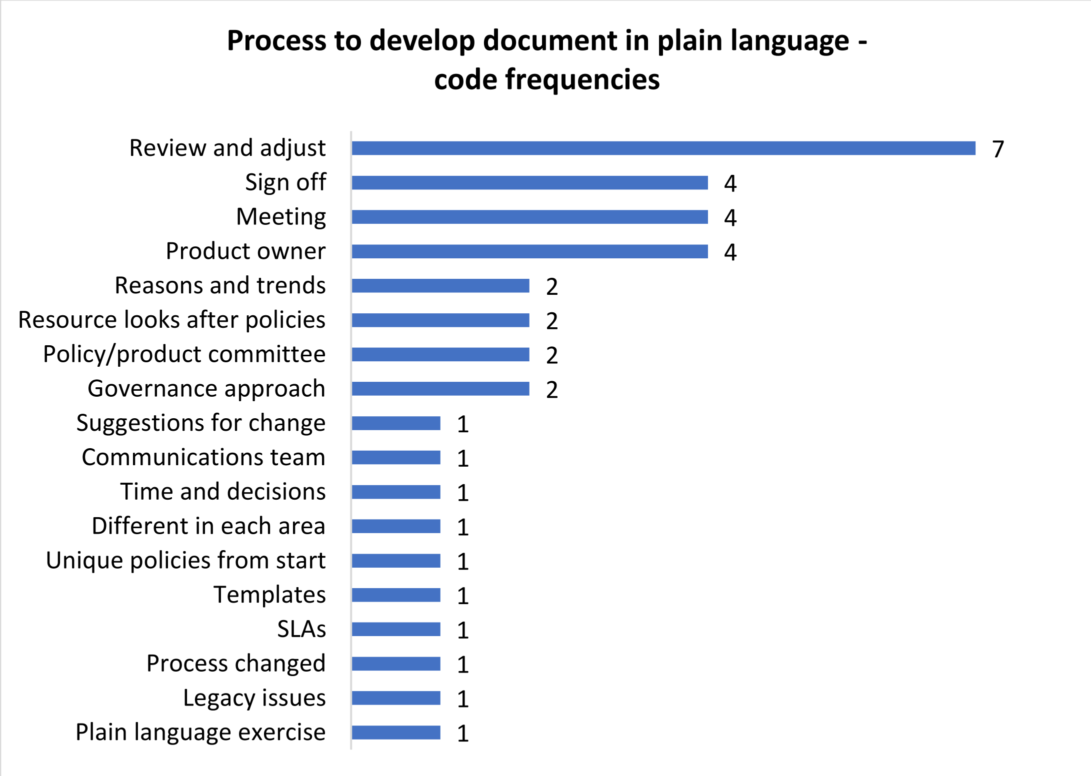

Figure 5.15: Process to develop document in plain language

According to Representative 1, Organisation 1 looks for the reasons and trends why claims are being rejected. "Are there key clauses or are there key things that are not happening in the sales process that is causing those problems?" There are legacy issues in the company. This means that there are old policy wordings and scripting that does not comply with legislation. Where any problems with policy wordings and scripting are identified, the documents are reviewed and adjusted. Representative 2 said that the product owner looks at the document and reviews and adjusts it to simplify it to the best of their ability. The company will only go through a plain language exercise with an external expert when new products are developed. "…if there is a further problem, the product owner just looks at it and does what they think".

Representative 1 from Organisation 2 explains how the process to develop documents in plain language changed over time: "We wanted to use an approach that kind of change the whole landscape and system at the same time and tried to form a foundation and then apply that foundation or thinking to every piece of communication. A very methodical route. We realised that the approach is not very effective, because our business is changing too much and trying to do this big change is ineffective and rather changing it in pockets is more effective over time. So, we did move from this big programme approach to changing communication to very specific projects and also implementing a governance approach that over time actually achieved the objective as oppose to a small group of people that have to take the whole organisation through this change process".

The company has developed templates, based on plain language principles, for customer communication such as welcome letters. If a document is not written on the template basis, the product owner or the person who initiated the communication will send it to the governance team. The governance team reviews and adjusts the communication according to set SLAs (service level agreements). The document is sent back to the product owner for their final input. "When there is no consensus, we would have a meeting, and, in the meeting, we would discuss it". The changes are then implemented, and the document goes through a final sign off process.

Organisation 3 does not have a formal process in place to specifically develop documents in plain language. Representative 1 believes that the company has had unique policies from the start. "As part of that process of designing our own unique policy wordings, we wanted to be different and we wanted to speak to our customers in our written correspondence as normal people. We didn't want to confuse people. We were not scared from the outset to use language that is different with the view that the customer can understand what it is we are talking about". Furthermore, the dedicated resource that looks after policy wordings is an admitted attorney with a passion for language.

If a specific problem is identified in a policy wording, the company will hold a meeting with the relevant stakeholders from the policy committee. The policy committee consists of people from the Marketing department, the Actuarial department, the Chief Operating Officers from the different areas and the Claims department. The stakeholders make suggestions for changes in the meeting. The policy wording is then reviewed and adjusted, and the final version is circulated for sign off.

Representative 1 from Organisation 4 said that “there isn't really a process”. The process is different for the different areas. To change one of the company’s policy wordings takes time and decisions. “In certain areas, even if a policy wording is identified as being difficult to read, it might not even change directly then. It might take some time for it to change or for the decision to be approved for it to be changed”. When a policy wording is changed, the product owner will determine what needs to be changed and why. Sometimes the Communication department is involved in the changes: “…depending on the amount of changes needed, they would then make contact with the Communication team to just assist where necessary…”.

According to Representative 2, each policy is owned by a product owner. If a particular piece of policy wording has had a series of complaints, for example, the reasons and trends for the complaints are tabled with the product owner and their product committee in a meeting. The product committee reviews and adjusts the policy wording. The suggested changes go round-robin through Compliance and Risk, Customer and various areas in the company. Once the changes are accepted and signed off, the changes are implemented on the system and released to the customers.

- **Determining if document is in plain language**

Figure 5.16 depicts the codes that emerged when the representatives were asked how their companies determine if a document is in plain language. The main codes (service provider, test with staff and test with customers) were only mentioned by three representatives each. The representatives gave a range of answers and the results are therefore discussed per insurance company.

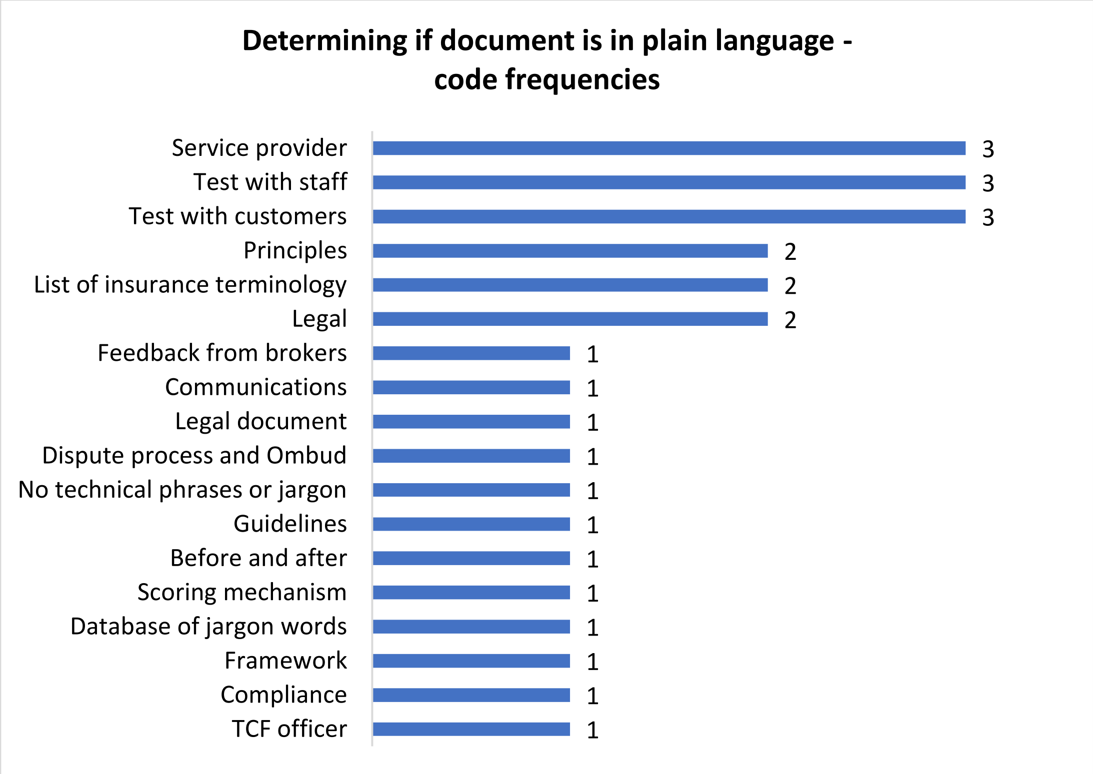

Figure 5.16: Determining if document is in plain language

Representative 1 from Organisation 1 gave the following answer: “To be honest, probably if myself (TCF officer), Legal or Compliance says this is gobbledygook and this needs to be simplified”. The representative furthermore said that when a policy wording undergoes any major changes, the document is formally tested with customers in focus groups or informally tested with staff members.

Organisation 2 has developed, with the help of a service provider, three tools to help them determine if a document is in plain language. Firstly, they have a framework to help them understand what plain language looks like. “It is a little house with a foundation and a roof. And each of those components represent an aspect of plain language”. Secondly, they developed 15 plain language principles that all customer communication has to align with and adhere to. The company uses a scoring mechanism to determine how well a piece of communication complies with the 15 principles. “We literally grade a score when we review a document and we do a before and after”. Thirdly, they have compiled a database of jargon words based on the Financial Sector Conduct

Authority's standardised list of insurance terminology that explains the jargon word and then explains how to use that word in a plain language context. The database of jargon words was tested with staff members. The company has also tested communication with customers to determine how well that piece of communication is understood, but it is not something they do regularly. "We've tested for understanding, we've tested for ease of access, can they easily find a bit of information in a document. We've done most of that through focus groups. Putting a couple of customers round a table giving them the policy wording, or very easily interviewing customers here in our service centre when they are done with a transaction to ask them for feedback on a specific piece of communication. We've even tested it with surveys, our customer experience surveys, to make sure customers understand what we are asking them".

Organisation 3 uses a set of guidelines and plain language principles to determine if a document is in plain language. The company also use a list of insurance terminology as a guide. "…there are certain terms in insurance that if you stick to the standard terminology it actually makes it easier for the customer to understand". Representative 2 said that the company tries to not use any technical phrases or jargon. "You need to try and translate what you think into plain language and really think about what is it that I know and what is it that the customer knows and write it in terms that that person can understand…". The company has not done any formal testing with customers.

Representative 2 perceives their dispute process and the Ombud as informal testing. The representative explained it as follows: "The industry regulatory bodies like the FSB (now FSCA) and the short-term Ombud is mandated to look at customers' complaints. If the customer complaint says that the contract is ambiguous, they would say the contract is ambiguous and give the benefit of the doubt to the customer. It is a legal principle. Where any dispute in a contract is laid out against the party that set the contract that is part of the laws of natural justice and the non-focus test of your policy contract".

To determine if a document is in plain language, Organisation 4's Legal department will look at the document from a legal point of view to make sure that the document would make sense to the normal customer. The Communication department also takes a look at the document. The Communication department will then ask an external service provider to do a basic plain language edit on the document. The company sometimes tests the document informally with customers or with staff members. Representative 1 said that "… we don't test formally". Representative 2 said that they use the feedback from brokers (usually in the form of complaints) to determine in documents are in plain language.

- **Barriers to implementation of plain language**

The following question was asked to the representatives: "Do you experience any barriers to the implementation of plain language in the company?". Figure 5.17 illustrates the codes and code frequencies associated with the representatives' answers.

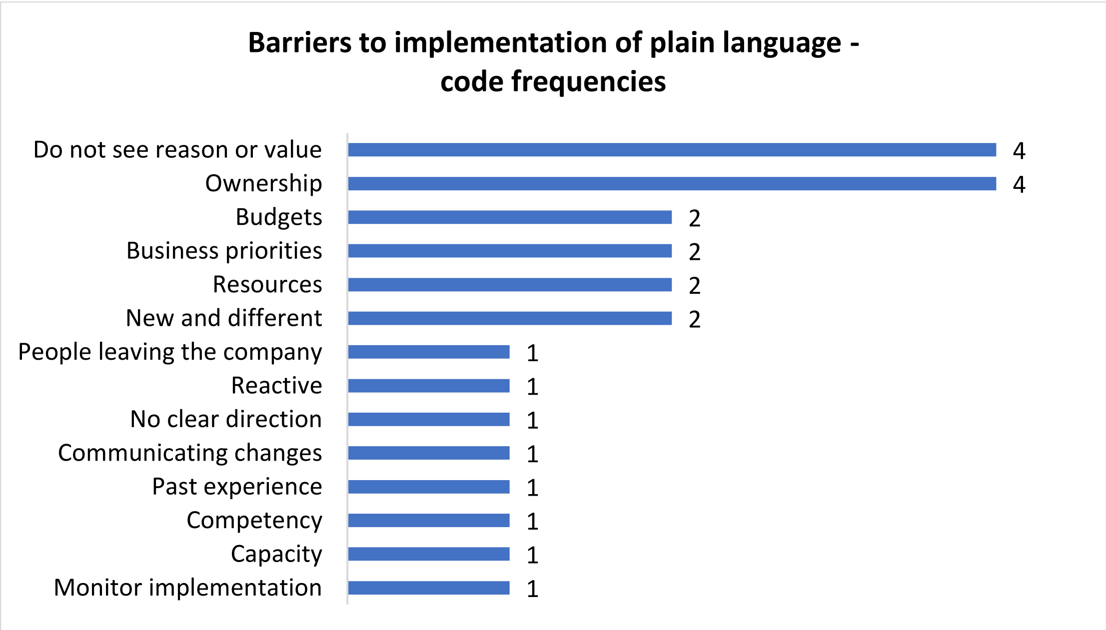

Figure 5.17: Barriers to implementation of plain language

The main codes were do not see reason or value and ownership with four mentions each. The following quote explains the resistance that one of the representatives experienced in their company: "We have always been a company that is concerned with profitability and everybody focus on producing numbers rather than all the other bits that go with it so it has been quite a challenge to change the environment and get them to understand if you do things better, smarter, differently, hopefully the profitability will follow". A representative from another company said that some people do not understand what plain language is even after they have received training.

The representatives had the following points of view in terms of ownership as a barrier:

- People do not want to take ownership of their writing: "…people don't want to own a decision; they would rather let it hang. We have documents where so many stakeholders have to sign off in order for something to be implemented. We love round robins. You hardly have a person that say, 'I am making the decision and let it roll out. I will be accountable for it'."; and
- People are protective of their writing and do not want to change it: "…the previous drafters wanted to hold on to whatever they have written".

The remaining codes that received one or two mentions are discussed separately for each insurer.

Organisation 1 identified resources as a barrier to the implementation of plain language, as well as it being something new and different for the company. One representative said the following about monitoring the implementation of plain language: "I don't think the question is about the barriers, I think it is rather how effective is plain language and how effective is the implementation of plain language. I don't think there are barriers at the forefront, but I think there are barriers in the implementation to make sure everything is sound. I don't think we have gone through all our paperwork, all our policy documents and actually checked if plain language has been implemented. It is typical human behaviour, if it is not broken don't fix it. When it breaks then it is like why isn't plain language here? We are very reactive".

Organisation 2 acknowledged that resources, budgets and capacity are barriers to the implementation of plain language. Furthermore, the representatives said that competency is a barrier, because they have found that “certain people are just not capable of writing in plain language even after they have been trained”. A further barrier is business priorities. “I have seen many examples where business priorities surpass our plain language or customer efforts, where short knee jerk reactions to business priorities put plain language on hold within the organisation”.

Organisation 3 said that the fact that they are now embarking on something new and different, namely translating policy wordings into Zulu and Xhosa, is a barrier for them. “It is something we will have to keep our eyes open for because we don't know what we don't know. It is one thing to get an independent qualified translator to help us with Zulu or Xhosa but how do we make sure that it is plain language for those people who speak that language”.

According to Organisation 4, budgets and business priorities are barriers to the implementation of plain language in the company. Other barriers include: “key stakeholders who would influence people to think negatively about plain language due to past experiences of it” and “the fact that there isn't clear strategic direction in terms of what the business wants to do with regards to plain language and why”. A further barrier is people leaving the company who have been trained in plain language. “You put all of that effort in to help someone and you train them, and you spend money on them and then they leave. They go implement that knowledge somewhere else at a competitor”.

- **Measuring the value of plain language**

None of the companies actively measure the value that plain language holds for the company. However, the respondents were asked if they think there are any metrics or ways in which the value of plain language could be measured. Figure 5.18 summarises the codes assigned to the representatives’ answers.

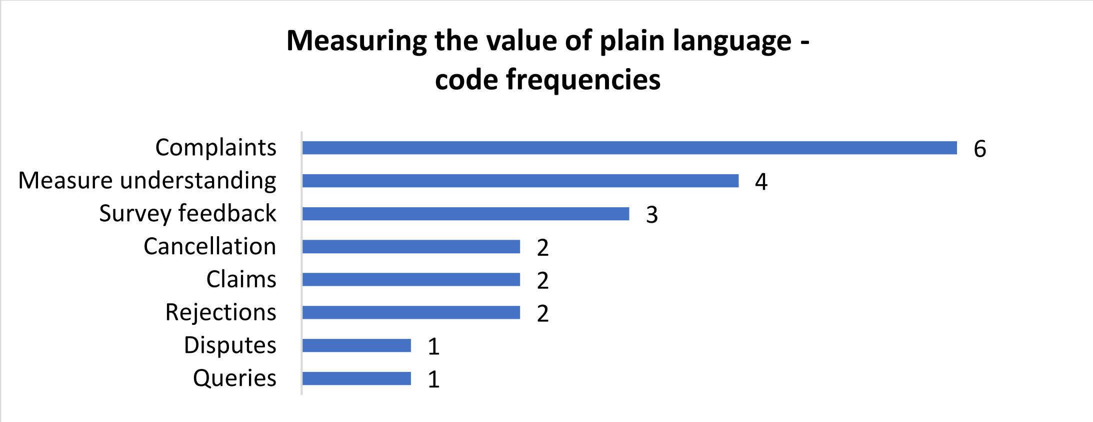

Figure 5.18: Measuring the value of plain language

Six representatives said that the value of plain language could be measured through complaints. The representatives said that the number of complaints before a document is converted to plain language could be compared to the number of complaints after the document has been converted. Another representative said that their company specifically placed on their complaints system a field that relates to the understanding of policy wordings and other communication. “We also put a rule in place with the complaints guys to say if there is anything with regards to that, let us know, and we went in that area and investigated the document, reviewed it and then put it through the governance framework and made changes making sure that nobody else goes through what somebody experienced”.

The code, measure understanding, was mentioned four times. One of the representatives said that their customer experience feedback could be used to measure understanding. “If the customer says I am cancelling because I didn't get the product that I wanted to, that is an indicator of the customer was confused... The customer will never say to you I cancelled because the language was not plain, the language was not clear”. Another representative said that measuring a customer’s understanding is what plain language is all about, “it is not about using a certain word, it is about does my customer understand what they have bought”.

Survey feedback was mentioned by three representatives as a way to measure the value of plain language. One of the representatives explained how the value could be measured with the following statement: “You could have a look at a product that is plain languaged and the experience and the feedback coming out of the surveys as opposed to a product that is not plain languaged, how do the stats differ?”.

The following codes received two mentions:

- Cancellation (“Common sense will tell you that there must be a direct correlation between proper plain language and client retention over time.”);
- Claims (“…you can determine whether or not your communication is in plain language or is understood through stuff like complaints and claims. The expectation at claim stage is x, they get y. Big drama because they thought they were buying something which they didn't get. I think in terms of measurement that is most likely the most accurate way of seeing whether or not the customers understand…”);
- Rejections (“Are we seeing fewer repudiations?”).

One representative explained how disputes could be used as a metric to determine the value of plain language: “You look at disputes on contracts. The numbers and amounts involved in settlements as a proportion of customers. You get a ratio of plain language disputes and then you compare it post-plain language…data in isolation means nothing. You need to compare data to data to actually see are we doing well, are we doing badly… We've got a certain amount of complaints reasons. If you extrapolate from those reasons, which of those reasons are most likely because of a dispute of the contract. Then, you can quantify and cost that and then you can start managing it”.

- **Monitoring implementation of plain language**

The representatives were asked how the implementation of plain language is monitored in their company. The codes and code frequencies are displayed in Figure 5.19.

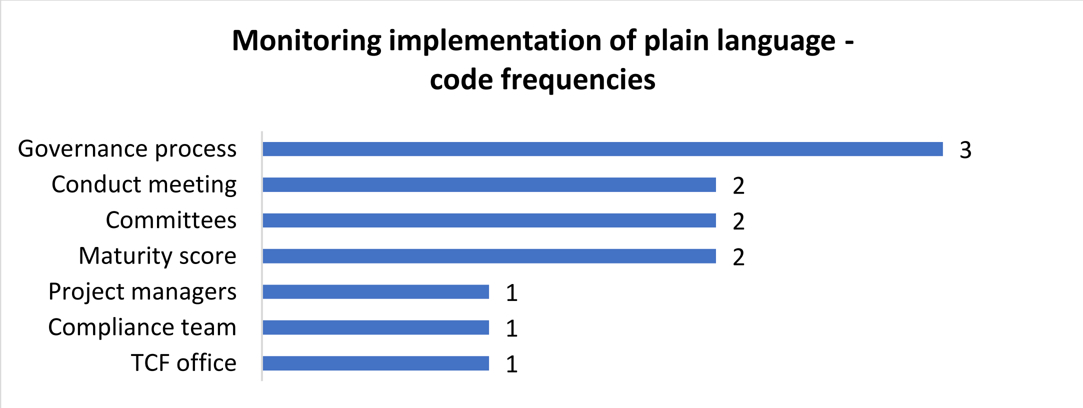

Figure 5.19: Monitoring implementation of plain language

The main code was governance process with three mentions. The codes conduct meetings, committees and maturity score received two mentions. Conduct meetings and committees (such as claims committees, service committees and complaints committees) monitors the implementation of plain language by identifying specific issues with policy wordings and other documents. One company have a maturity model in place, which is functional, to test and compare how different areas in the company implement plain language and their maturity.

The following codes received one mention:

- Project managers ("In the early days of our programme, all of these (plain language) practices were imbedded by our project managers…");
- Compliance team ("Your communication should not go out technically if it hasn't been signed off… by the Compliance team…"); and
- TCF office ("I am not aware of any form of monitoring. I think that it would sit in our TCF office. In my view, it is kind of diluted, because I do feel it needs to be independent").

- **Business benefits of plain language**

The representatives were asked about the benefits of implementing plain language in their companies. The main code with six mentions was less misunderstanding. The representatives said that plain language means less misunderstanding for customers. "The single biggest benefit is clarity so that customers and brokers have peace of mind, trust and confidence…". Another representative said the following: "Plain language, for me, is the glue that binds it all. What we used to do as an insurance industry… we make things so technical that it just goes over the customer's head. When it comes to claims it is hidden, we then repudiate the claim and the customer doesn't understand why it was repudiated…".

One of the representatives said that plain language also means less misunderstanding for employees. "We need to understand what we sell… Also, whenever we have a claim, for the Claims department it is key that they understand, because when a claim comes through, they refer to the policy wording…".

The following codes were mentioned four times:

- Employee engagement ("…ultimately, better the culture of the business");
- Economic benefit ("If we are open and honest and transparent, they would want to buy more from us because then there are no hidden agendas");
- Freeing manpower ("…freeing manpower because of less complaints. Less people to sort out issues" and "…shorten the period that you have to spend explaining things to customers"); and
- Better customer experience ("…improves customer satisfaction, if there is a better customer experience, customers are more satisfied" and "Customers, we found, were more forgiving from a plain language perspective").

The codes customer relationships and less complaints received three mentions. The following quote illustrates how plain language improves customer relationships: "It helped us to focus employees on customers because part of writing or communicating in plain language is understanding who the audience is and in those governance forums, the customer person's role is to ask that question, 'Who are we communicating with? What are their needs and expectations and are we doing this in the right way?' Part of that exercise is to help all the other role players understand that there is an end user who is the most important in the equation and that is our customer". One of the representatives explained the business benefits of having less complaints as follows: "The fewer of these complaints you have, the more efficient you are".

Better reputation was mentioned by two representatives. The remaining codes as displayed in Figure 5.20 received one mention.

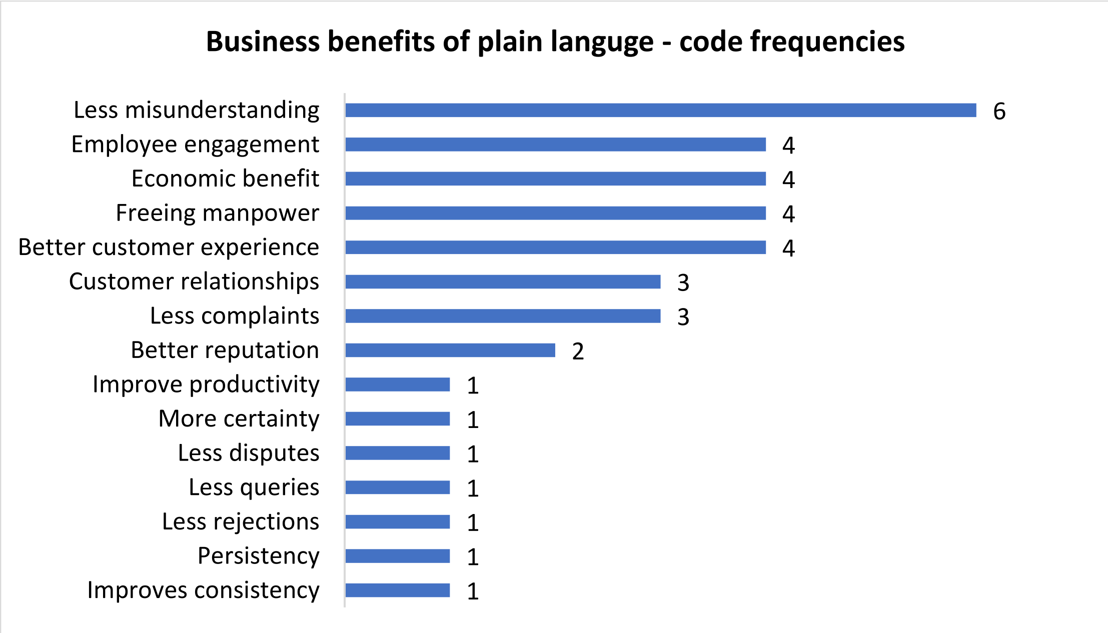

Figure 5.20: Business benefits of plain language

- **General awareness of plain language**

The representatives were asked how informed and aware their companies' employees (e.g. the call centre agents, the legal department and the underwriters) are with regards to plain language. The codes are displayed in Figure 5.21.

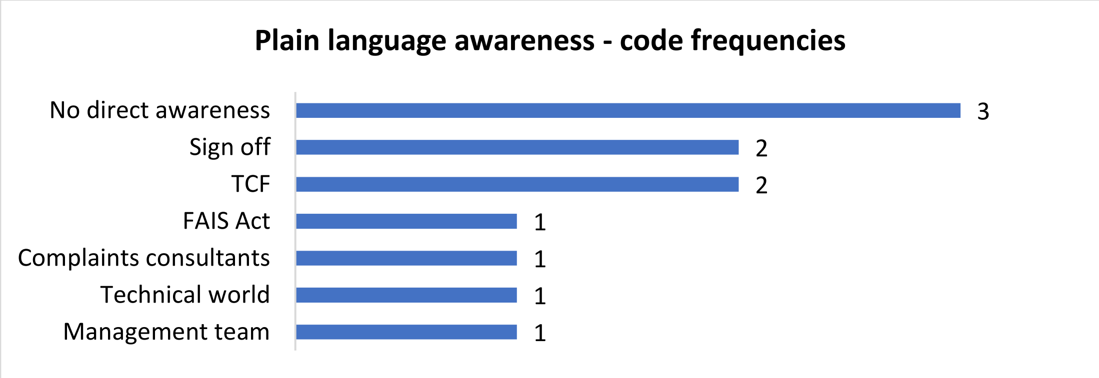

Figure 5.21: Plain language awareness

The main code was no direct awareness with three mentions. Speaking of call centre agents, Representative 2 from Organisation 1 said that they are not informed at all. "If you ask them what plain language is, they would probably say, 'me and you language' or language that we speak. I don't think they are aware at all". Both representatives from Organisation 3 said that their advisers do not have direct awareness of plain language. Representative 1 said "I think if you ask them directly, they would say 'what the hell?', because it is part of who we are". Representative 2 explained that the "scripting that pops up… is in as plain language as I think we can make it".

The codes sign off and TCF were mentioned twice. Representative 1 from Organisation 1 said that their legal department is informed of plain language "to the level that they sat in the meetings that I have discussed and had to sign off stuff and whatever. Sometimes they will come back and pick up things in policy wordings in the old policies and say this doesn't make sense". According to Representative 1 from Organisation 2, the underwriters are aware of plain language and they are part of the sign off and governance process.

The following codes were mentioned once only:

- FAIS Act (The advisers would say "what do you mean", unless you ask them in the context of the FAIS Act");
- Technical world ("The actuaries, no. With the best of intentions, their world is a technical world. It is a world where they need to use complex words");

- Complaints consultants ("I would say, consultants that work in the customer complaints space, I think is much more informed then consultants that work within sales contact centres, claim or admin contact centres because the complaints consultants deal with this every single day, they see the complaints where the customer thought he was buying this but bought that and that is why he is now angry because his claim is not being paid out"); and
- Management team ("Yes to a certain extent. Maybe the claims department's management team would know about it and understand the importance of it. Not too sure about the guys on the ground").

- **Awareness initiatives**

The representatives were asked if the company has any initiatives in place to create awareness for plain language. Figure 5.22 shows the main codes and other code frequencies.

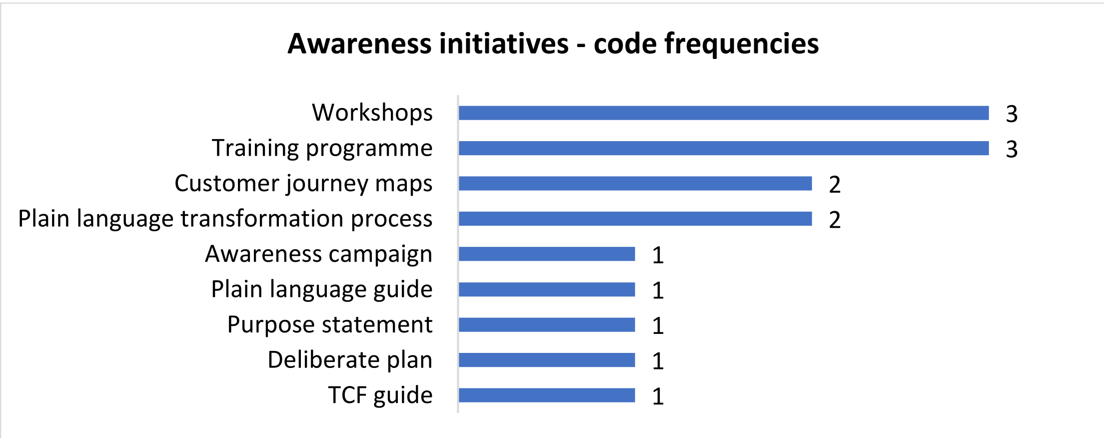

Figure 5.22: Awareness initiatives

The main codes were workshops and training programme with three mentions each. Both representatives from Organisation 2 mentioned a training programme and workshops. "We did a lot of workshops. We did a lot of training, we developed training material, we had interactive pdfs…". The company trained their staff, management, reviewers and the people who form part of the governance team. Representative 1 from Organisation 4 also mentioned workshops and a training programme. The communication department went through a training programme where they learned how to “write better” and how to “write for the audience”.

Customer journey maps and plain language transformation process were each mentioned twice. The second representative from Organisation 2 explained that they “set processes in place that was never there, we did customer journey maps to see where we have to relook our communication objectives and stuff like that. We did a lot of work regarding how to improve our communication. It wasn't just about the content; it was about the processes and looking at our systems”. Representative 2 from Organisation 1 said that awareness was created through the plain language transformation process that the compliance department was responsible for. Organisation 4 created customer journey maps for their frequently used Personal Lines letters. “We nicely tried to plot that on a customer journey to see where what fits in, where is the golden thread so that the customer journey would not be confusing”.

The following five codes were mentioned once:

- Awareness campaign (“At the end of 2016 we did a major internal campaign to generate awareness of plain language”);
- Plain language guide (“We developed a Plain language guide. It is also on the intranet should people want to refer to that. How many people use it, I don't know”);
- Purpose statement (“Recently we started with this purpose statement not only in terms of language. It runs through all aspects of our business. It is in terms of products, policy wordings, distribution channels, any correspondence that must go out to clients. We want to make it easy for people to contact us. Simple and plain must be part of our offering to clients. We try to do that in everything that we offer to clients”);
- Deliberate plan (“So we had a very deliberate plan to create awareness and target specific people”); and
- TCF guide (“I think we do have some sort of guide within the Compliance team. I think TCF also has it because TCF and Compliance have a joint

kind of role to ensure that customers understand what they buy because TCF is part of the regulator and now it is becoming the law”).

- **Service providers**

The representatives were asked if their companies make use plain language service providers and for which services specifically. The findings are discussed separately for each company.

Organisation 1 makes use of the services of the Plain Language Institute. As the company launches new products, they automatically go through a plain language exercise with the Plain language Institute. The plain language exercise involves simplifying the policy wording and testing the final wordings with customers in focus groups.

Simplified acts as a plain language service provider for Organisation 2. The service provider played an important part in shaping their initial approach to plain language. “We sent all our documents to them to do an audit based on their principles…” Simplified developed training material and ran all the initial training sessions. They were responsible for the training of the representatives that form part of the governance process. Furthermore, the company also involves Simplified in the rewriting of complex or large documents when they do not have the capacity to do it themselves.

Organisation 3 does not make use of a plain language service provider.

The Plain Language Institute has assisted Organisation 4 with plain language services. The Plain Language Institute has trained the company’s communication department. They have also assisted with the plain language editing of letters and other documents.

- **Value add/drawbacks of using service providers**

The representatives were asked what the value-add as well as the drawbacks are of using a service provider for plain language services.

Both representatives from Organisation 1 said that it is very important not to lose the intent when putting a document in plain language. Representative 1 said that “We have had some challenges when you look at a pre-existing clause, that you find by the time we have simplified it, it has no longer got the intent to it that it needed to have. So, there is always that bit of back and forth in that you try and keep it simple but still need to have the correct meaning to it that sometimes gets lost if you are not careful”. Representative 2 added that it would help if service providers sit, or have sat, in the industry or have been trained in industry knowledge.

Representative 1 from Organisation 2 said that initially they knew nothing about plain language. “We had no framework or understanding how it is achieved. We didn't know when a document is in plain language or to what extent it is in plain language”. The service providers brought the thought leadership and the approach to help implement plain language in the company. The representative added that the service provider also helps to understand how things evolved in terms of plain language. “…it was about a 3, 4-year relationship. Over that time, she helped us track how things changed, how the legislation has changed and whether we have to tweak certain things in our framework and approach to plain language”. In terms of drawbacks, Representative 1 said that service providers are expensive.

For Representative 2, the value add was “making sure and bringing in the international benchmarking of industries and other companies, because we were so focused on getting started but we didn't know where to start or what to look up”. The representative did not mention any drawbacks.

For Representative 1 from Organisation 4, their service provider especially adds value in the communication department. “There are not a lot of service providers out there that one could really trust, that really know what they are talking about and that really know what they are doing. For the Comms team, specifically, it is an absolute awesome resource to have. Someone you can trust and that you can really give work to and know that you don't have to worry about the end result or have to redo some of it or have to keep your finger on them the whole time to make sure something happens and that you get value for the money that you spend”. The representative said that the service provider also added value to “those areas of the business who are willing to ask for assistance and who are willing to make it a priority and who’s at a stage where they can focus on key things and where they will bring in Legal, Communication and plain language”.

5.2.4.2 Plain language practitioners

The two plain language practitioners were asked questions about the implementation of plain language and how they assist their clients in this regard. The results are discussed separately for the two practitioners.

- **Understanding of plain language**

The following question was posed to the practitioners: “What is your understanding of plain language and what do you base your definition on?”.

Practitioner 1 said that she bases her definition on “the understanding on which we all go by”, i.e. the definition of plain language in the South African law. She added that the International Plain Language Working Group is working towards international standards for plain language. An international definition of plain language was initiated by Martin Cutts who is one of the stalwarts of plain language. The definition is based on the following three points:

- Easily find the information you are looking for in a document (“…that is all your design and navigation tools, indexes, headings, is it standing out, what colours have you used”);

- Understand the information that you have found ("…that is all the typical plain language criteria, all our standard technical criteria, active voice, short sentences, familiar words etc."); and
- Use what you find ("People need to understand that documents are functional in the workplace. They are functional pieces of communication. We need to use them for a specific purpose… and then to me a document is plain…. it can be used for the purpose it is intended.").

Practitioner 2 said that the definition of plain language in the South African law "is a very comprehensive definition and it is defined from the perspective of the end user". She said that it is aligned to the definition of PLAIN and it is a workable definition that sets a good standard.

- **Ensuring plain language compliance**

The practitioners were asked how they would rate organisations like short-term insurers' efforts and success in ensuring compliance with the regulatory requirements of plain language.

Both practitioners said that all the companies are making an effort to comply with the requirements, but that the companies' success is not where it should be. Practitioner 1 added that a reason why success has been lower is because the companies work in a silo approach. "You have different departments responsible for different elements and unless there is cohesion, you are continually going to have these individual pockets where people are not speaking to each other".

Practitioner 2 said that "I think companies find it difficult to know how they should make that effort. Where should they start and how should they implement it (plain language)". She emphasised the role that plain language practitioners play in contributing to the successful implementation of plain language in organisations.

- **Determining if document is in plain language**

The practitioners were asked how their companies determine if one of their client's documents are in plain language.

Practitioner 1's company conducts plain language audits. "It depends again on why the client is running the project. The criteria we have can range anywhere from 10 to almost 40 criteria we have to measure a document for plain language". The company tests the documents against the criteria using a rubric and give individual and overall scores. Practitioner 1 explained it as follows: "You can have perfectly plain language and it hasn't met the user's needs at all. You tell them about carrots, and they wanted to hear about apples. As plainly as you spoke about carrots, it is not going to help them". The audits also have a user testing component. "The user testing will always decide if a document is in plain language". They present the findings of the audits to the clients and also use the audits as a measure of success of a project.

Practitioner 2 believes that the only way to determine if a document is in plain language, is to test it with customers. She explained it as follows: "Clients expect you to give them a score on how good this document is. 'Is this document in plain language?' Strictly speaking, I can't say this to you if I haven't tested it with a customer".

However, the company can give their clients a comparison using readability scores. "I can just give a broad idea and say in terms of your competitors, you are not doing very well or in terms of those tests your documents are very complex". Practitioner 2 said that she does not see much of a point in telling clients they are not performing well; she would rather put them on the road to get better. The company does this in the following manner: "What we would do is we would give you a readability score, but we would also give very high-level comments on your document and point out internal inconsistencies or sentences that we do not think your customers would understand... Structure is particularly problematic, some comments on the structure and how you could improve it. Some guidelines as to how you can start on the road to get better".

- **Process to develop document in plain language**

The practitioners were asked to explain the process that their companies follow to develop or convert a document in plain language for one of their clients.

The first step for Practitioner 1 is to assemble a multidisciplinary team and to get all the stakeholders aligned at the outset of a project to ensure that all the parties involved are on the same page. Secondly, they try not to limit the project to not only one document. "…one document has an impact on a number of documents. Your policy wording needs to align with the quote and the benefit schedule. So, the quote and benefit schedule need to be simplified. Claims letters also need to be. They mustn't see it as a document but as a process. The process needs to be aligned in plain language".

The next step is to conduct an audit of all the communication and to rewrite the communication. "Let's show you where you are falling short of the mark… this is what we found, and this is what we need to do...". The company often trains internal people to rewrite the communication, but if the company does not have the capacity or resources, they would train them in quality assurance. If the company is responsible for rewriting the communication, they follow an iterative process of user testing. Practitioner 1 explained their process with the following statement: "We'll often test version A in an audit, we'll test for understanding, we'll test for the complexities, we find out what the users want from that communication because again no matter how plain the document is I produce, if it isn't meeting the needs, it is not going to be an effective piece of communication. We test, we refine, we test, we refine, it often goes three or four rounds before you have a final document".

Practitioner 2’s company follows the following process to develop or convert a document in plain language for one of their clients:

- Develop a template and a structure for the document;
- Analyse and annotate the original document with comments and questions for the client to respond to in writing or in a meeting;
- Draw the clauses into the new structure and then start rewriting. Cross-referencing is very important;
- Test the document with customers (if the client chooses to do so) and deal with any remaining questions and comments;
- Prepare a final draft; and
- Send the final draft for final proofreading and approvals.

Practitioner 2 emphasised the importance of having a multi-disciplinary team on the client’s side. The team should, for example, consist of the product owner, the underwriter, a person from legal, a person from claims and a person from the communication department.

- **Barriers to implementation of plain language**

The practitioners identified the following barriers to the implementation of plain language:

- Churn (“You put a lot of effort in training a junior person and then after a few months they are no longer with the company”);
- Practice of insurance (“The practice of insurance is cut and paste. All companies, or most of them, when they develop new documents or new policies, they cut and paste… So, you are always working in the reverse, there is seldom in a new policy a process of ‘Okay, what is it we want to offer to this customer segment? What is it that they need?’ and the policy is built from scratch, built on needs and also on the requirements of you as an insurer, you want to cover yourself as well, you still got to make money out of this policy. But that doesn't happen”);
- Value of plain language is not demonstrated (“It is not as easy to demonstrate the value”);

- Lack of buy-in ("…because there has not been a discussion and the value has not been explained. Both the theoretical argument and the demonstrated value. There is that misconception about plain language");
- Do not see value of user testing ("All companies… and it is one of the buzzwords of our age… we are customer-centric. They want to be customer-centric; it is almost as if they want to, but they don't want to, they don't want to listen to customers, they don't really want to engage with customers");
- Lack of resources ("…people who can write");
- Timelines ("What we find often happens is documents are brought to us far too late in the process. They will come and say we have been doing this groundwork in the last year on this new policy and we are going live in a month, now you must simplify it. A month is not a sufficient amount of time to implement a proper framework and grounded project").

- **Misconceptions about plain language**

The practitioners were asked about the common misconceptions people and companies have about plain language.

For Practitioner 1 there are two main misconceptions. The first is that one's job is done after converting the document into plain language and that there "will be no further communication problems or troubles". The second is that plain language is dumbing down the language in the sense that "you are condescending to your readers, you are talking down to them, it is cat sat on the mat language, instead of people perceiving it as a sophisticated means of communication".

For Practitioner 2 a misconception is that people see plain language as a language. "If you just look at the term it is focused on language and focused on being plain or simple. So often you do a whole explanation of what plain language is and then your client comes back and use the term simple language. Just put it in simple language". Furthermore, she said that if that is one's perception about plain language then the engagement with the user of the document falls away.

Both practitioners said that a common misconception is believing that plain language would lead to less call centre calls or less complaints. Practitioner 1 put it as follows: “It is very hard to measure plain language because often what we find companies would say to you that they want to reduce the number of calls in a call centre or they want to reduce the number of queries but what we find, which I actually think is a positive, is once you simplified something sometimes initially the level of engagement is higher. People can finally understand, and they are calling and asking the right questions. You have a higher rate of call centre calls not a drop in the rate of call centre calls. You need to frame the measurable not as fewer calls but what is the content of the calls”.

Practitioner 2 added that “This document is now in plain language for me. It has been revised. Now, it is very clear, I can understand everything. Now for the first time I am actually willing to read it and I see that I don't agree with this clause. Now, I feel comfortable to complain whereas before I wouldn't even have known what I should complain about. Having communication in plain language does not necessarily mean that you will get less complaints especially initially”.

- **Monitoring implementation of plain language**

The practitioners were asked how plain language implementation is monitored in organisations like short-term insurance companies.

Practitioner 1 said that when they have completed a project for a client they try and implement a process for them internally to monitor the implementation of plain language. This involves appointing an internal plain language consultant. Practitioner 1 admitted that “There are just not a lot of them. Some companies have writing departments with actual writers and even them you have to train up to a level of plain language competency”. Furthermore, the process involves having all the tools in place such as terminology guidelines, built-in checklists and audit criteria, user testing and a stakeholder sign off process.

Practitioner 2 said that they developed a maturity model for a client. She emphasised that a monitoring instrument should be part of a company’s implementation plan for plain language. Also, “you need someone or a department who would do the monitoring… and you need to report against the instrument”.

- **Business benefits of plain language**

The plain language practitioners were asked what the business benefits of implementing plain language are for organisations like short-term insurance companies.

Both practitioners said that plain language leads to better understanding. They said that “it would be beneficial to the industry because people won’t claim for things, they know are excluded…” and “it would give you communication that everyone, not only your customers but also your employees, can understand, they can relate to it, they can use it”.

Practitioner 1 also mentioned customer loyalty and better relationships with customers, fewer complaints to the Ombud and a better reputation.

Practitioner 2 said that plain language gives internal consistency to documents and it would be easier for employees to analyse documents and make decisions. It would therefore make employees more productive. From a customer perspective, the benefits are similar. “If you have something that is extremely dense and ugly and difficult to work through, you don't understand what you are supposed to do or how this is relevant for you then you act negatively to it. You can even be at the point where you don't want to or can't read it. Whereas if it is attractive, the structure is clear, the logic is clear, it is relevant, you know exactly what is expected of you, it is ‘Wow’, it is almost like a lightbulb moment, now you can do something with it. I think that is the main benefit of plain language”.

- **General awareness**

The two plain language practitioners were asked what they think is the best way to create plain language awareness in companies.

Both practitioners mentioned plain language style guides and the intranet. Practitioner 1 said that “the plain language style guide needs to be advertised at a company-wide level”. Practitioner 2 said that it is good to have a guide as part of plain language implementation plan. “Something you can put on your intranet, it is there, it is like a dictionary. It is available to everyone. You can combine it with your internal style guide, that is ideal, so it is something that is on your desk, you can use it whenever you need it”.

Practitioner 1 has created awareness by showing clients what their real users have said about how poor their communication has been. Furthermore, she said that “there are competitions, internal quizzes, all sorts of things that are built in internally to make it much more fun” and to create awareness of plain language.

Practitioner 2 said that they “have examples where a client had a very successful awareness campaign. It is expensive of course and the questions is always sustainability. Everyone was very enthusiastic; you have a little blog or weekly examples and then gradually it peters out”.

Practitioner 2 gave the following answer when she was asked when the right time for a company is to run an awareness campaign: “When you have a strategy and implementation plan ready. That could be part of it. So, you have an awareness campaign right there, a big one, but then you got to plan how you are going to sustain it. I always think it is good to involve your employees in that awareness because you almost want them to be your monitors, your watchdogs, if they buy into this is where we are going with our company, this is what we want to do, let them celebrate or point out the examples where plain language has added value. Let them also point out those areas where it is really needed to engage with a target audience to improve”.

- **Training**

The practitioners were asked about the role of training in the implementation of plain language in companies.

Practitioner 1 believes that everybody in a company should be trained on plain language. The training should be top down. “You need to start by training the partners and then move down… Pitch the training at the right level”. Training is also important to create plain language champions in the company.

Practitioner 1’s company offers training with regards to the following plain language aspects:

- Awareness creation (“…we start with shorter awareness sessions”);
- Writing (“…we have mentoring programmes and longer initiatives of training where they have to produce work monthly”);
- Quality assurance (“…they actually take the documents and we see that they are able to do it as objectively as we would do it”); and
- User testing (“The user testing will always decide if a document is in plain language”).

According to Practitioner 2, training can have different objectives. “It could have the objective to get buy-in and get an understanding, address misconceptions… but you also want to develop plain language expertise in your company itself, so you don't always rely on an external service provider”. The practitioner believes that if an internal team is involved in a plain language process with an external service provider it is better training than the service provider coming in and giving the training. “What I have also seen is people that are involved in a plain language process they then become the champions because they understand the process and they see the value of it because they have been part of the value of it… They are partners, but they are trained in that partnership relationship”. Furthermore, Practitioner 2 thinks that “it is good to involve your training department so that you have a basic training module even if it is just to establish the basic understanding and to give some examples of how a process works and what the interests are”.

- **Plain language competency**

The following question was posed to the practitioners: “Do you think everyone is capable of doing plain language?”

Both practitioners said “No”. Practitioner 1 explained that “You can find really good writers that can't write in plain language or you can find really poor writers who have a good grasp of plain language. You have that contradiction; you have to have a passion for clear communication. You have to have all the tools, bricks in place to build your house but you still need to want to build it”.

Practitioner 2 said that it is normal for writers to write from their own perspective with their own needs in mind. “It is a different strategy to communication from the perspective of the end user. It is something you could learn but it is not easy… especially in complex documents, to phrase complex ideas or complex arguments or complex exclusions or conditions in a way that it is clear for a particular target audience, requires very good analytical and logical skills and not all people have that”.

- **Bad experience with client**

The practitioners were asked the following question: “Have you ever had a bad experience with a client where there wasn't buy-in or they didn't get or understand plain language?”.

Practitioner 1 said that they had a bad experience with a client who was implementing plain language purely for compliance. She explained the experience as follows: “What they had was an external project manager. So, it was a person not tied to the company who didn't have a vested interest in the company but only had a vested interest in the project milestones being met. Nothing was aligned in terms of strategic alignment. There was no strategy. There was just a here is 2000 documents put them in plain language in six months. That approach is just not a sustainable approach at all… it felt at the end that we didn't add value to the consumers of that company”.

Practitioner 2 explained her worst experience as follows: “I've done work on a policy in very close cooperation with an underwriter and I enjoyed the process, it was a relatively smooth process and we were quite chuffed with what we achieved and we had the buy-in from the senior person, but then the senior person changed and it was somebody much more conservative whose not been part of the process. Unfortunately, there was no communication… I had no communication with that senior person. There was never the opportunity to take them through the process”. Furthermore, the legal department was understaffed, and they were not involved in the process.

- **Future of plain language**

The practitioners were asked the following question: “How do you see the future of plain language in South Africa?”.

Practitioner 1 answered as follows: “I would like to say that the future of South Africa is where it becomes more the norm, where it is standard practice that something is converted to plain language before it goes out as just a matter of everyday business”, but unfortunately “it is not going anywhere in a hurry”. The practitioner added that it would be beneficial if we start seeing some judgments from the various Ombuds and the regulator. “I think that would also promote and push plain language in the right direction”.

Practitioner 2 emphasised that the value of plain language has to be demonstrated. “The more we can demonstrate the value of it and the more business value that it is having for companies, the more people will be inclined to implement it”. The practitioner added that “the more court cases there are in favour of the customer would also help to drive it and get it implemented”.

5.2.5 Objective 4: Plain language as a strategic priority

The representatives and practitioners were asked questions that relate to the degree to which plain language is considered a strategic priority in organisations such as short-term insurance companies. The short-term insurance representatives’ answers were coded, and the results are discussed in the next section.

5.2.5.1 Organisational representatives

- **Top management’s role in implementation of plain language**

The representatives were asked about the extent to which top management is involved in the implementation of plain language in their companies. Figure 5.23 shows that the representatives gave a number of different answers. The results are therefore discussed separately for each insurance company.

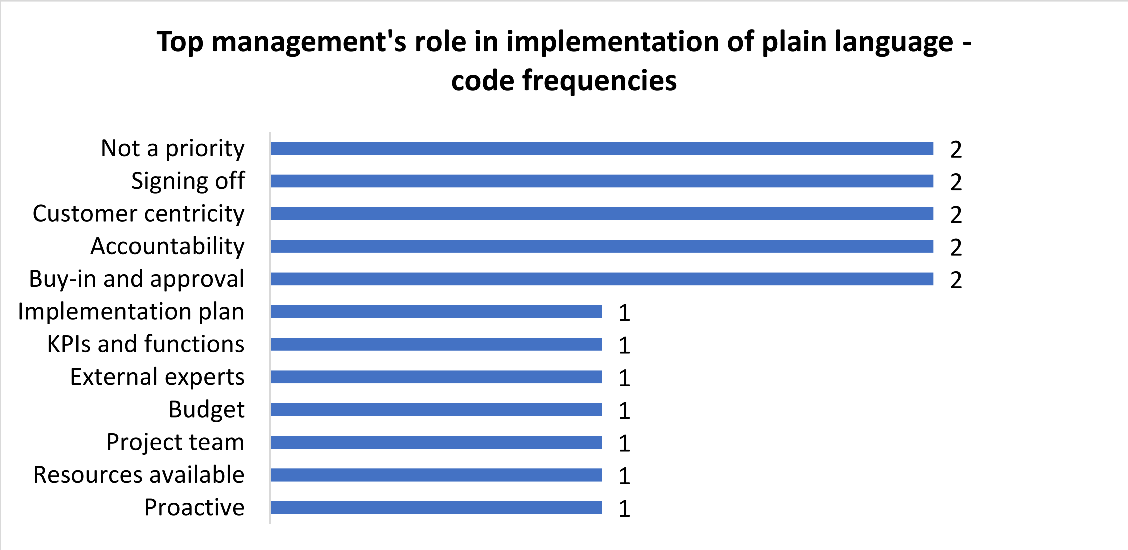

Figure 5.23: Top management’s role in implementation of plain language

Both representatives from Organisation 1 said that top management is held accountable for the implementation of plain language in the company. Representative 2 added the following: “…unfortunately it is always when the fires are burning that is when we really take out the whip and say you've not made this simple… it should be a more proactive role from the top management team's side”. Representative 2 said that from a customer centricity point of view, the entire top management team should play a role in the implementation of plain language.

Representative 1 from Organisation 2 said that top management’s role in the implementation of plain language was to make resources and budget available to establish a project team. “Top management also plays a role in making sure those teams are there, that it is in their KPIs, that they know they are required to fulfil that function”. The top management team also brought in external experts to help with training and the implementation plan. Representative 2 added that top management played a role in signing off anything that needed to be changed, who should be involved and how it should be rolled out. “We always had buy-in and approval from the top. It came before TCF, you couldn't even say this was done as part of TCF, it was before that”.

Representative 1 from Organisation 3 said that top management not only gave their buy-in and approval for plain language, but are also part of the implementation, because they give input into the policy wordings and are involved in the signing off process. Top management “is very focused on making sure that not only customers will understand the policy wording but also our advisers. That is why plain language is also important, you can't have a document that is going to confuse your own people. It must be easy for us as well to understand”. Representative 2 emphasised that for the company to be customer-centric, it has to implement plain language and that top management plays an important role in making plain language an inherent part of the company.

Both representatives from Organisation 4 said that the implementation of plain language is not a priority for the company. Representative 1 made the following comment: “They are not involved in the day-to-day implementation of plain language, but they do have the word plain language in their minds and do say it sometimes, if I can put it like that… every now and again it comes up as a theme in different areas of top management but currently our executive doesn't know about plain language”. Representative 2 added that: “I don't think that top management really believe that plain language is a priority. I don't think that today as we stand, I don't think that anybody believes that plain language is really a thing”.

- **Implementing plain language as a strategic priority**

The representatives were asked the following question: “How is provision made for plain language in the company’s business strategy and strategic priorities?”. The codes and code frequencies are displayed in Figure 5.24. The results are discussed separately for each insurance company.

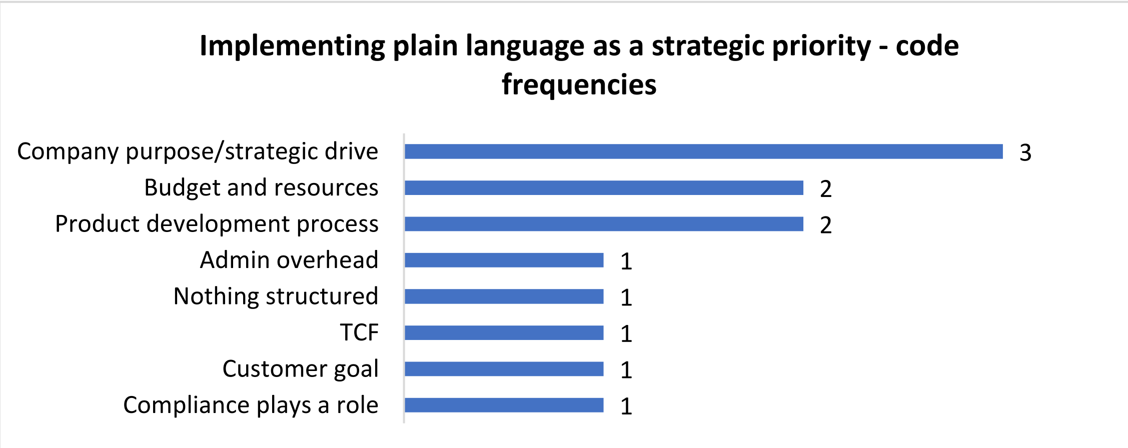

Figure 5.24: Implementing plain language as a strategic priority

For Organisation 1, plain language is part of the product development process in the company’s business strategy. Whenever the company develops a new insurance product, they do a concept document and a full business case. The business case consists of building a product and a financial model (predicted sales and costs). Part of the financial model is the cost to develop a plain language policy wording. Representative 2 said that compliance plays a role in the units of the business, but the representative was not sure that compliance was actively looking at implementing plain language across the company.

Organisation 2 allocated specific budget and resources for the implementation of plain language according to the company's business strategy. Plain language sits under the Trust driver of the company's purpose and customer goal. Representative 1 explained it as follows: "…that customer goal ensures that something like plain language or the way we communicate with customers are presented at least within our business strategy. Because each business is held accountable through the customer goal, there is more traction in our plain language efforts than without it. So, the customer is well represented within the businesses and our businesses are required to show improvement and deliver against their customer goals and obviously plain language is part of the way they communicate with customers". Representative 2 said that the provision for plain language is now part of TCF. "It somehow became part of one of the objectives of TCF. I feel it lost its own identity".

Representative 1 from Organisation 3 said that: "If you look at our annual strategy, you won't find anything that has got to do with plain language". However, the company makes provision for resources and budget. Plain language is also part of the product development process. "…the way that we have designed our policy wording all these years makes provision for plain language. Since our inception, our approach, our philosophy to our core business has been to make it easy". Plain language is therefore part of the company's purpose and strategic intent.

Both representatives from Organisation 4 said that no provision is made for plain language in the company's business strategy. Representative 1 said that the company has nothing structured in their strategy in terms of plain language. "Not from a holistic company point of view, but in each different area there might be in certain ways and forms provision made for plain language…". Representative 2 said that plain language is seen as an admin overhead. "It is a piece of work that sometimes needs to get done, to convert a piece of communication into something that is more understandable. But again, it is seen as a piece of admin overhead. Admin but for very clever people. And we don't have very clever people here. We have people that can do admin but that can only do simple admin tasks. Don't ask them to do complicated admin tasks. You've got to give them to somebody else to do".

5.2.5.2 Plain language practitioners

- **Demonstrating the value of plain language**

The practitioners were asked the following question: "There is often a lack of buy-in from top management, they don't see the value of plain language. Do you think there is a way to show the value of plain language?".

Practitioner 1 said that she thinks it comes down to why the company is implementing plain language. "What are the reasons why you are implementing this? Is it because you want more sales at the end of the day, bottom line, is it wanting to protect reputation, is it wanting to do the right thing by your customers?". She added that all insurance companies talk about being customer-centric. "You can make your products fair; you can meet all the other TCF requirements but without the clarity of the content you are not ever going to meet that consumers' needs".

Top management has to be involved from the outset of a project. "They need to be in that initial stakeholder engagement to define clearly the goals of the project so that they are the ones that are driving resource allocation etc. in the project". They do a lot of awareness sessions to get top management to understand what the strategy is and to get their buy-in. Furthermore, they often propose an audit at the outset of the project so that at the end of the project the company can see a measured improvement of the communication. The measured improvement could be used as a business tool to make a business case for plain language.

Practitioner 2 said that the only way that insurance companies can show value is on the customer's side. "A document or a communication in itself won't demonstrate the value, you have to go back to the definition of plain language, and it is your end users, your target audience, who will demonstrate the value. If you have like a baseline, this is how our customers experience a particular piece of communication at the moment, you can demonstrate value along the line as you improve that".

Practitioner 2 confirmed that there is a place for customer surveys and complaints in showing the value of plain language but added that it is only possible if the company has a baseline customer satisfaction index and if their customer satisfaction questions relate to the clarity, relevance and usefulness of documents. She cautioned that one must be careful with complaints, "because if this is a document and I have no idea what this is saying, what should I complain about except that I can't understand the document. People are very reluctant to say that they don't understand especially in a country like ours where the business language is English, and a very small percentage of our population has English as their home language. So, what does it say about me, am I not educated? Am I stupid?".

- **Top management's role in implementation of plain language**

The following question was presented to the practitioners: "What do you think is top or executive management's role in the implementation of plain language?".

Practitioner 1 stressed the fact that successful plain language projects are top down. "They (top management) have to be brought in from the beginning through the awareness sessions and through the stakeholder engagement". Top management must provide budget and resources and make plain language part of the company's KPIs for the implementation to be successful. "I have seen it work very successfully where they have put plain language as one of the KPIs in a review of one of the employees built into the system". In addition, top management has to be clearer on the consequences of not complying with plain language guidelines.

Practitioner 2 stated that top management plays an important role in developing a plain language strategy and implementation plan that is aligned to the company’s business strategy. She added that “You need buy-in for plain language at the top level, they need to know exactly what it is we want to achieve with plain language, where are we going and how are we going to implement that because they have to allocate and approve the budget. If you don't have a budget, you can't do anything”.

Practitioner 2 thinks it is good for top management to speak to an external expert i.e. a plain language practitioner to “try and address some of the misconceptions and try and show how plain language as a concept speak to a customer-centred company and why it is essential, if you want to be customer-centred of course you have to speak in plain language, you got to implement it”.

- **Driver of plain language implementation**

The practitioners were presented with the following statement and question: “The drive for plain language sit at different departments in different companies. Where do you think should the drive for plain language implementation sit in an organisation?”.

For Practitioner 1 the drive should be according to the company’s strategy. She gave the following example: “If the company has a drive to sell more policies because the more policies you sell the bigger the pool of clients you have, the better benefits you can offer to those same clients. If the drive is there maybe the marketing department should be controlling the documents”.

Practitioner 2 emphasised that companies are structured differently, and one therefore has to look at the overall structure of the company to determine with which department the chances for plain language to be successful is the best. “The power that certain departments have in companies are not the same. A company like Nedbank for example, I know their communication department is central to the company. All their important documents go through their communication department and they have very qualified people that has been there for years, so they have the capacity to do this. Other companies that we have worked with, your communication department does not have that central powerful position, they have a lot of junior people who come and go and to have your plain language driven from such a department could be disastrous".

Both practitioners mentioned that plain language involves different stakeholders from different departments. Practitioner 2 specifically said that "if you have a very strong customer department that have a good relationship with all of the other departments like Claims, your product developers, your marketing department, then you could have it (the drive) in a customer department, but not all companies have an essential customer department. If your product developers are powerful and they have a strong relationship with, and they are prepared to listen to, a customer department or a marketing department and compliance and communication, then you could have it there but if they work in silos and they are not really talking to the others then you also have a problem".

- **Implementing plain language as a strategic priority**

The practitioners were asked how organisation like short-term insurance companies could implement plain language as a strategic priority.

Practitioner 1 proposes that companies look at why they are implementing the plain language initiative. "That is often governed by whether it is aligned or not to the strategy. If a company is merely doing it to align to compliance, you are going to find that the project is not terribly successful. The compliance should be the afterthought. It should be do it for the right reasons, do it because it is going to improve your bottom line, do it because it is the right thing to do by your customers and by the way you also complied".

According to Practitioner 1, the company has to determine the strategic direction and outcomes that they are looking for with the implementation of plain language. It is important to have a deeper understanding of their strategy, what they are trying to achieve and where they are going with their business as a whole. “If you are aligning your strategy and plain language to truly inform and guide and do all the right things, I think you can align it quite easily with your strategy as a company”.

Practitioner 2 said that you must unpack the company’s business strategy. She gave the following example: “Let’s say your business strategy is that you want to become customer-centric, you have to unpack that. What does it mean? As you unpack that, it will, I believe, bring you automatically to a point where you have to engage with your customer, understand what they need and what is relevant and what is useful to them. That brings you to the same starting point where you would be with plain language”. There is a logical alignment between plain language and customer-centricity. “We can't be customer-centric if our communication is not in plain language. To be customer-centric our communication must be in plain language… You need the argument to show that engaging with your customer is the driving force for your implementation”.

Practitioner 2 explained how companies could go about developing a plain language strategy and implementation plan. She agreed with Practitioner 1 that the first step is to understand how the company works and how it is structured, because one of the key decisions would be to determine which department should be the driver and where should the focus be for a start. The practitioner said that “there are questions like what do you want to achieve, what are you working towards, how are you going to engage with your top management and then what are your priorities, where can we demonstrate value, what are the areas that you think would be critical for the business that are really not doing well at the moment”. Once the company has discussed and answered these questions, then the company can decide where it will start with the implementation, who will be responsible and what they will be doing.

Furthermore, the company should also determine how they will monitor progress and how they are going to assess the value that has been demonstrated. “Then you can have almost like an iterative process, you could start somewhere, and you could then expand it into the business. You need to have a clear vision of where you want to go and what you want to achieve in the next five years for example. It is important also that the implementation plan is designed in such a way that you can report against it and you want to report that you are doing well".

Practitioner 2 stressed the importance of including a strategy for user testing in the implementation plan. She said that "It is not enough to say we are going to test with customers from time to time. You need to think about how you are going to do that… You need a user testing strategy as well that keeps in mind that I won't be able to test each and every piece of communication with customers… I think it is very important to engage with the customers about the customer journey and their expectations of that. So, you know at least where you need communication and where you don't need communication or what would be relevant for customers at each point, what are the things that they need to know, and they have to do".

5.3 CONCLUSION

This chapter set out the findings gathered from in-depth, face-to-face interviews with eight representatives from short-term insurance companies and two plain language practitioners. In the next chapter, conclusions of the research findings are drawn in relation to the research objectives. Furthermore, a conceptual framework is recommended for implementing plain language as a strategic priority in organisations.

CHAPTER 6

Conclusions and recommendations

6.1 INTRODUCTION

Based on the literature review in Chapters 2 and 3 and the interpretations of the results in Chapter 5, conclusions in relation to the objectives are drawn in Chapter 6. In addition, a conceptual framework is proposed to address the overall goal of the study. Figure 6.1 depicts the place of this chapter in relation to the entire dissertation.

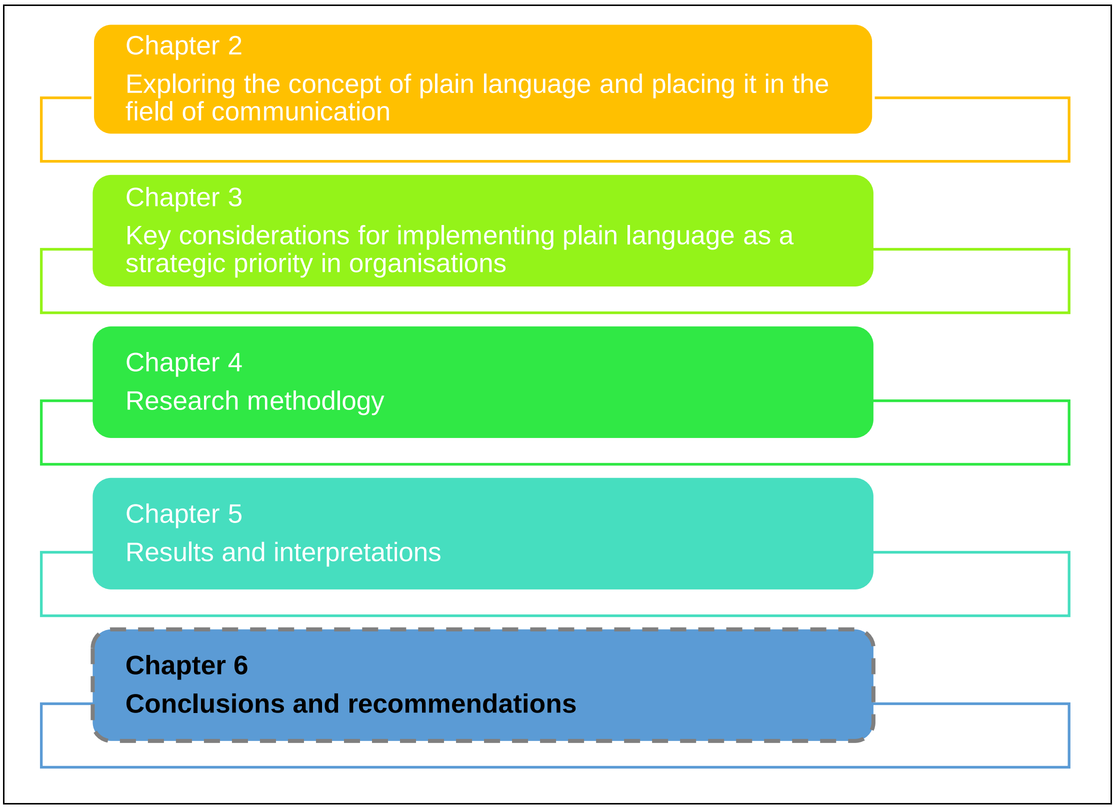

Figure 6.1: Chapter 6 in relation to the entire dissertation

6.2 CONCLUSION OF FINDINGS IN RELATION TO RESEARCH OBJECTIVES

This section draws conclusions on the research findings in relation to the research objectives of the study, thus providing the foundations for a possible solution to the overall goal of the study.

6.2.1 Objective 1: Strategic priorities

The first research objective was to explore the strategic priorities of organisations. To do this a closer look was taken at the companies' business strategy, the extent to which strategic planning takes in the company and how strategic plans are communicated to the different business units. Key strategic stakeholders and how the companies build and maintain their relationships with these stakeholders were also considered.

Three out of the four insurance companies have a business strategy in place. This means that they have a clear strategic direction that they want the organisation to take (Wheelen *et al*., 2015:9). The other company, however, has faced a lot of uncertainty because of organisational and management changes. These changes have left the company without a clear business strategy, and without a clear business strategy the business units of the company are forced to work in silos.

The companies prioritised growth and profitability as key aspects of their business strategy. These aspects could be considered the key values that are important to the success of their organisation, i.e. their strategic priorities (Margolis, 2019a).

In addition to growth and profitability being strategic priorities, the importance of customer-centricity was also emphasised. The companies recognised the changing role of the customer and that it is important to ensure that the products that they offer meet the needs and expectations of their customers. According to Fader (2012:9), customer-centricity is the ideal strategy for an organisation that wants to gain a competitive advantage in the market and remain profitable while seeking to build and maintain healthy customer relationships.

None of the companies directly identified plain language as a strategic priority for their organisation.

Strategic planning is a means to an end with the end being the company's overall business strategy (Bryson, 2004:6). The important role that leadership plays in strategic planning was emphasised. Strategic planning takes place at the top with the executive leadership of the company or its global entity. Top management is responsible for developing the company's overall business strategy. The strategy is translated into customised strategies for the different business units, departments or areas of the organisation. These strategies are communicated to the senior management team (SMT) through leadership conferences, forums and workshops. The SMT then filters the strategy down to the other leadership levels such as the general and team managers who are responsible for communicating the strategy to the employees and putting the strategy into action.

Brokers, customers, employees and the regulator were identified as important strategic stakeholders for the companies. Some of the representatives said that their companies could improve the way they build and maintain their stakeholder relationships. One representative said that their client engagement is very transactional; another said that there is no strategic communication with employees.

There is thus a need for effective communication and stakeholder relationships. This need emphasises the importance of making plain language a strategic priority in organisations. As discussed in the literature chapters, plain language has become the new rhetoric of organisations because it makes business sense for them to use plain language in all communication with stakeholders (Mountain, 2014; Prem, 2014). It is impossible for organisations to communicate effectively if they do not have rhetorical knowledge of their target audiences. This means that the organisation must understand the needs and expectations of their key strategic stakeholders, such as customers and employees. In addition, it is not possible to communicate effectively if messages are not understood, or used, by the target audience (Schriver, 2012:282; Nord, 2018:46).

Communication is much more than a transactional process, but rather a process of establishing and negotiating mutual understanding. Plain language could be considered one of the tangible means of effective two-way symmetrical communication with stakeholders (Doss et al., 2015:298). It is critical for an organisation to adopt plain language as standard business in order to successfully build and maintain stakeholder relationships (Prem, 2014).

Based on the discussion related to Objective 1, the following implications should be emphasised:

- Plain language plays an important part in effective communication and stakeholder relationships, i.e. building and maintaining relationships with stakeholders by means of two-way symmetrical communication. Plain language should therefore be considered the new rhetoric of organisations.
- For plain language to be implemented as a strategic priority in organisations, it must be:
  - initiated at top management level and integrated into the strategic planning of the organisation;
  - articulated as a value that enables an organisation to achieve its goals, i.e. caring for customers that goes beyond mere compliance;
  - clearly aligned to the mission and vision of the organisation - the contribution of plain language to the success of the organisation should be clear for all management levels and employees.

6.2.2 Objective 2: Plain language needs of customers

The second research objective was to explore the plain language needs of customers. To do this the factors that influence one’s choice of insurer was explored as well as what constitutes an ideal relationship between a customer and an organisation like an insurance company. Customer retention and customer and broker understanding were also considered.

According to the representatives, the main factors that influence a customer's choice of insurer are price and confidence in claims. Price plays an important role for entry level customers when they choose an insurance company. More experienced customers would however also consider the company's reputation and claims paying ability. Trust also plays a role.

The practitioners agreed that price plays a role but also mentioned service and the attractiveness and understanding of policy wordings as factors that influence a customer's choice of insurer. Furthermore, there are two types of business in insurance, namely the direct business where customers do not have a broker and the broker business. It is common for direct customers to shop around between reputable insurance companies and decide which company gives the best cover at the best price. In terms of the broker business, customers usually rely heavily on the advice of their brokers. Because brokers deal so closely with the insurance companies, the service that they receive will influence which insurer they choose for their customers.

For the organisational representatives the ideal relationship between an insurance company and customers would be an engaged and trusting relationship. An engaged relationship comprises a servant relationship with the customer helping them to solve their problems and achieve their goals. A trusting relationship involves an insurer that is the preferred brand of customers. It is important that there is no misalignment between what the organisation promises (i.e. its products and services) and what the customer experiences.

The practitioners indicated that the ideal relationship between a customer and an insurer would involve a level negotiating plane and responsiveness on the side of the insurer. It would also involve a positive customer experience where claims are quickly processed and paid out to the customer.

The factors discussed above reflect the need for organisations to implement plain language as a strategic priority. Plain language promotes trust because it is a way to show honesty and humanity (Buckley, 2011). Organisations can develop their credibility (called ethos by Aristotle) and reputation by adopting plain language (Maslansky et al., 2011:11; Patterson, 2014). If customers understand and use an organisation's products and documents, it is more likely that they will also trust them and view them in a reputable light (Maslansky *et al.,* 2011:11).

Furthermore, an engaged relationship means that there is no misalignment between the needs and expectations of customers and what the organisation offers. In order to be in touch with the needs and experiences of customers, an organisation has to engage with them. This can only be achieved through two-way symmetrical communication, and, as was previously established, two-way symmetrical communication can only be achieved through adopting plain language as standard business practice in the organisation (Schriver, 2012:282; Nord, 2018:46).

The companies follow different approaches in terms of customer retention. Some of the companies retain their customers reactively by reducing premiums, downgrading cover or reducing the sum insured. Others do it proactively at the beginning of the relationship by making sure that they deliver good service to the customer and that they sell the right products to the right customers using the right distribution channels. Plain language is central to this type of customer-centric approach to retention.

Customer retention is not only about keeping customers satisfied but also about building and maintaining a positive relationship (Shelford, 2017). Communication, knowledge and service is key to build and maintain relationships with customers. Customers must also feel that they are treated fairly in order for them to remain loyal to an organisation. Transparency and inclusion are characteristics of an organisation that has adopted plain language as standard business practice (Stephens, 2016).

Five out of the eight representatives do not think that customers have a good understanding of their insurance contracts. The representatives emphasised the role that brokers play to explain policy wordings to customers as well as the role of plain language where there is no broker to bridge the gap between the customer and the policy wording. There is thus a definitive need to improve customer and broker understanding through plain language. Lewarne and Britz (2013) state that a policy wording in plain language will ensure that there is no ambiguity in terms of what the policy covers, and the terms and conditions associated with the cover.

It is important for organisations to measure and analyse customer experience especially in the competitive short-term insurance industry (Schreuder, 2018). The short-term insurance companies mainly use surveys and complaints as ways to measure customer experience. The companies send out surveys to their customers and brokers after each transaction, for example after a quotation or a claims experience. Furthermore, all the companies have a complaints line. Customer complaints are analysed through sentiment analysis to determine how the company could improve their customer experience in future.

Based on the discussion related to Objective 2, the following implications should be emphasised:

- A key selling point for plain language is that it leads to credibility and trust and that it improves understanding for stakeholders such as customers and brokers; and
- The value of plain language could be demonstrated through a company's customer experience measures.

6.2.3 Objective 3: Approaches to plain language implementation

The third research objective was to explore the approaches that organisations follow to implement plain language. To do this, the following aspects were considered:

- definitions and understanding of plain language;
- approaches to ensure compliance with the regulatory requirements of plain language, to determine if a document is in plain language and to develop a document in plain language;
- monitoring of plain language implementation;

- measuring the value of plain language implementation;
- barriers to, and misconceptions about, plain language implementation;
- business benefits of plain language implementation; and
- the awareness of plain language in the organisation.

The companies do not have the same understanding of what plain language is and what it entails. The representatives from **Organisation 1** define plain language as simple language. It involves transparency and making sure that customers know what they are buying. The representatives from **Organisation 2** have a similar definition but added that plain language involves written and verbal communication and that it takes place at different levels.

For the representatives from **Organisation 3** plain language involves using everyday language, which means using no jargon or legalistic language. The representatives from **Organisation 4** define plain language in terms of a document that is easily understood by an ordinary customer. The customer can find what they need in the document and respond to it. A document in plain language is also well structured and designed and involves some level of user testing.

The practitioners referred specifically to the outcome-based approach to plain language and the definition in the South African law. Organisation 4 was the only company whose understanding of plain language referred to some of aspects of the outcome-based approach and the definition of plain language in the South African law.

The outcomes-based approach states that a document is in plain language when readers easily find what they need, readily understand what they find, and act appropriately based on that understanding (Viljoen-Smook *et al*., 2017:22). The outcome-based approach does not only focus on the linguistic aspects of a document but also on visual design elements such as navigation tools, headings and other style elements. In turn, the approach also promotes user testing as an important part of plain language (Cheek, 2010:4-6).

A customer focus is central to the definition of plain language in the South African law. According to the definition in the NCA and CPA, a document is in plain language if an ‘ordinary customer’ who has ‘minimal experience’ in the relevant product or service can understand the document’s ‘content’ as well as recognise its ‘significance and importance’ without ‘undue effort’ (Gordon, 2011).

The definition emphasises that the following elements should be focused on when writing a document in plain language (Gordon, 2011):

- The usage of the document;
- The accuracy and comprehensiveness of the document;
- The sentence structure in the document;
- The terminology and jargon used in the document; and
- The use of reading aids such as headings and examples in the document.

In the literature, the elements of the above definition of plain language was compared to Cicero’s five canons of rhetoric. The five canons are invention, arrangement, style, delivery and memory (James, 2009:33). Their plain language equivalents are content, structure, expression, document design and databases. This comparison positions plain language as the new rhetoric of organisations in today’s competitive business environment.

The four companies follow different approaches to ensure compliance with the regulatory requirements of plain language, to determine if a document is in plain language and to develop a document in plain language.

Organisation 1 uses a sign off process. All customer communication (e.g. policy wordings, scripts and marketing material) go through a sign off process to make sure that the document complies with the regulatory requirements of plain language. A number of individuals are involved in the process. The individuals include the product or business owner, the key individual in the business, Legal and Compliance. The parties involved have not been trained in plain language.

The compliance department, specifically the TCF officer and the Chief compliance officer, and the legal department are responsible for the implementation of plain language in the company. The compliance and legal department determine if documents are in plain language and identify any communication that have to be simplified. The customer and communication departments are not involved.

To identify problems with existing policy wordings and scripting, the company looks at the reasons and trends why claims are being rejected. Once the problem has been identified, the owner of the policy will review and adjust the policy wording or scripting. If the wordings undergo any major changes, the changes will be tested formally with customers in focus groups. All new policies are developed in plain language with the help of an external service provider. The policies are tested with customers in formal focus groups before they go live.

Organisation 2 follows a communication governance process with a dedicated governance team. The governance team include product experts, legal experts, customer experience experts, communication experts and operations experts. All the experts have gone through a training programme on plain language. The governance team reviews new and existing customer communication to ensure that the communication is appropriate for the intended target audience and in plain language.

The company has developed, with the help of a service provider, three tools to assist them with determining whether a document is in plain language. The first tool is a framework in the form of a house that illustrates the components that form part of plain language. The second tool is 15 plain language principles. The governance team uses a scoring mechanism to determine how well a document aligns with and adheres to the 15 principles. The third tool is a list of jargon words with plain language explanations.

The company has templates based on the plain language framework and principles that can be used for the development of new documents. If a document is not written on the template basis, the document is sent to the governance team. After the communication has been reviewed and adjusted by the governance team it is sent to the person who initiated the communication for final input. Once these final changes are incorporated in the document, it goes through the final sign off process.

The company has done some user testing with customers in the form of focus groups and individual discussions.

Organisation 3 has a dedicated resource in the compliance department that looks after policy wordings and other customer communication. The company also has a policy committee. The policy committee consists of people from the marketing department, the actuarial department, the Chief Operating Officers from the different areas and the claims department.

When the policy committee reviews and adjusts policy wordings, the dedicated resource uses a set of guidelines and principles to ensure that the policy wordings meet all plain language requirements. The policy wordings also go through a sign off process. The company has not tested its policy wordings with customers.

The company does not have a specific process in place to develop documents in plain language. The representatives from Organisation 3 believe that the nature of their company is, and has always been, to use plain language. Plain language is part of their culture and the way they conduct their business on a day-to-day basis.

Organisation 4 follows a silo approach. Each business area is responsible to comply with the Acts and laws that are relevant to that area including the regulatory requirements of plain language. It is up to each area to determine how they will comply with the relevant requirements and how they will develop documents in plain language.

According to the representatives, the implementation of plain language in their company usually involves communication audits in some areas, precis of long documents and plain language edits by an external service provider.

If there is a problem with a particular policy wording, the reasons for the problem is tabled with the owner of the policy and the product committee. It is up to the product owner and committee to review the policy wording and make the necessary adjustments to the wording. In instances where there is budget available, an external service provider is involved in the process.

The legal department, communication department and compliance department take a look at the policy wordings and accept or reject the suggested changes. Once the policy wording has been signed off by all parties, the changes are implemented on the system and released to the customers.

The company does not test documents formally with customers but do take into account the feedback that they get from brokers.

The practitioners emphasised the importance of a multi-disciplinary team and user testing in the process of implementing plain language in an organisation. A multi-disciplinary team should be part of a plain language project. This ensures that individuals from different areas and departments are on the same page from the start. According to Inslee (2012), the right mix of people must be involved and work together as a team for plain language initiatives to be successful.

The practitioners agreed that user testing is ultimately the only way to determine if a document is in plain language and if the document will work in the real world. User testing should therefore be part of the plain language implementation process (Inslee, 2012).

In addition, the companies use different approaches to monitor the implementation of plain language. For **Organisation 1**, the monitoring of plain language implementation sits in the compliance department and the TCF office.

Furthermore, the company has a claims, service and complaints committee and holds quarterly conduct meetings to discuss any problems with policy wordings or other documents. The TCF officer writes a separate, independent report on the conduct of the business.

In the initial stages of plain language implementation, **Organisation 2** had dedicated project managers for plain language. The company's governance approach is now their monitoring instrument. The governance team determines the maturity of documents in plain language. Furthermore, a document should not go out to customers if it has not been signed off by the governance team.

Organisation 3 monitors the implementation of plain language through the policy wording committee and the management sign off process. No changes can be made to policy wordings without sign off from the committee and Exco.

Organisation 4 has developed a maturity model to track plain language implementation in the different business areas, but the model has not yet been used.

None of the companies actively measure the value that the implementation of plain language holds for their company.

The four companies face similar barriers to the implementation of plain language. In some cases, the barriers are unique to the nature and business practice of the company.

Organisation 1, 2 and 4 face the challenge of people not seeing the value of plain language and therefore not supporting its implementation. The practitioners emphasised that buy-in from top management is critical to the successful implementation of a plain language project. It is important that top management understands what the value of plain language is. The practitioners proposed awareness and training sessions to get top management's buy-in from the start. Inslee (2012) suggests that a company presents plain language as a solution to a specific business problem to get support and buy-in from top management and other employees.

Ownership was also identified as a barrier in these three companies. Individuals in the company are either not willing to take ownership of their writing or they are over-protective of their writing and do not want to change it. Both instances are barriers to the implementation of plain language and shows that plain language is not considered to be a strategic priority in these organisations.

Resources, budget and capacity are barriers for Organisation 1, 2 and 4. Competency was specifically identified as a barrier for Organisation 2. The company has found that not everyone is capable of writing in plain language. The practitioners agreed and stated that a person must have a passion for clear communication and good analytical and logical skills to be able to write in plain language.

The monitoring of plain language implementation is a challenge for Organisation 1. The company has legacy issues and have not gone through all their policy documents to check if plain language has been implemented.

Organisation 2 and 4 identified business priorities as a barrier. For Organisation 4, this barrier is multiplied by the fact that they do not have strategic direction in their company in terms of how the business wants to implement plain language. The representatives from Organisation 3 did not identify any barriers directly related to the implementation of plain language in their company.

The above barriers are in line with the barriers that the practitioners have experienced with their clients, namely churn, lack of buy-in, lack of resources and timelines.

For the practitioners, a further barrier to the implementation of plain language is the practice of insurance. The practice of insurance is not to develop policy wordings from scratch but rather to copy, paste and tweak clauses from existing policies to create new ones. A policy wording is seldom written from the point of view of the customer which makes plain language implementation as a strategic priority very difficult. Another barrier for the practitioners is that companies do not see the value of user testing and engaging with customers.

The organisations identified tangible and intangible benefits that plain language has for their business. The main benefit was that there will be less misunderstanding if policy wordings and other customer documents are in plain language. There will not only be less misunderstanding for customers but also for employees. If policy wordings are in plain language, customers and employees (especially those working in the claims department) would better understand what the policies cover and what they do not cover as well as what the terms and conditions for cover is.

The practitioners agreed that plain language will lead to better understanding for customers and employees. Plain language gives the company communication that one can understand, relate to and use.

According to PLAIN (2018), plain language improves customer service and customer experience because there is less chance that customer communication will be misunderstood. This in turn improves customer satisfaction. A further benefit is better relationships. Plain language enables a company to better understand their customers' needs, wants and expectations.

Plain language has an economic benefit for the insurance business. Plain language does not only save a company time and money but also improve sales (Child, n.d.; Michalsons, 2014; PLAIN, 2018). A policy in plain language is easier to sell than a complex one riddled with jargon and inconsistencies. Plain language also shows openness and transparency, which is favourable attributes for customers choosing an insurance company.

Plain language frees up manpower and saves the business personnel resources because there will be less complaints and less disputes. Sales advisers will also spend less time explaining the policy benefits to customers (Child, n.d.; Michalsons, 2014).

All companies have introduced, to a certain extent, initiatives to create awareness of plain language in their companies.

Organisation 1 has created awareness of plain language through the company's plain language transformation process where plain language is included in the development of all new policies.

The company mainly perceives plain language to be part of the TCF outcomes. The employees have therefore been aggressively trained on TCF but not specifically on plain language. There is also a TCF guide available on the company's intranet.

Organisation 2 had a formal training programme when they started implementing plain language in the company. The training programme involved experiential engagement with specific employees where the concept of plain language was explained through an interactive and fun manner. The company targeted employees from the communication governance space, legal, compliance, product development, claims and admin operations.

Furthermore, the company developed customer journey maps to re-evaluate their customer communication objectives and to set new processes in place to improve their communication.

Organisation 3 has not introduced any initiatives that relate directly to plain language but has recently started with a purpose statement. The purpose statement relates to simplifying the way the company does business with their clients. This includes their policy wordings, distribution channels and any correspondence that must go out to customers.

Organisation 4's communication department was involved in a training and mentoring programme with an external service provider. In 2016, the communication department launched an internal campaign to generate awareness of plain language. The campaign was very visible throughout the company as well as fun and interactive. During the campaign, the company's

Plain language guide was shared with all employees. The Guide is also available on the company's intranet.

One of the practitioners cautioned that the sustainability of awareness campaigns could be problematic. According to Inslee (2012) and Brockman (2004:7-10), an awareness campaign could be launched after the successful completion of a plain language project to market plain language and to give recognition to employees who use plain language in their communication.

Furthermore, the practitioners stressed the importance of training to create awareness of plain language. According to Brockman (2004:8), all employees should be trained on the basic principles of the plain language. Training is also important to create plain language champions in the company. If an internal team is involved in the plain language process, they become plain language champions when they start to understand the value plain language holds for the company.

Based on the discussion related to Objective 3, the following implications should be emphasised:

- Organisations have different definitions of plain language and different views of what it means for them;
- Organisations follow different approaches to the implementation of plain language. It is unlikely that a silo approach to plain language will have a sustainable and lasting effect on plain language implementation;
- The corporate communication function/department does not play an active role in the implementation of plain language in these organisations.
- None of the organisations have a set way to monitor the implementation of plain language;
- User testing should be part of an organisation's plain language implementation process;
- The benefits of plain language should be emphasised to demonstrate the value of plain language across an organisation; and

- Training programmes and awareness initiatives should be included in a company's plain language approach, but for the implementation of the programmes and initiatives to be sustainable it should be timed correctly.

6.2.4 Objective 4: Plain language as a strategic priority

The research objective was to determine the degree to which organisations regard plain language as a strategic priority. To do this a closer look was specifically taken at top management's role in the implementation of plain language as well as if, and how, provision is made for plain language in the organisation's business strategy and strategic priorities.

For plain language to be implemented as a strategic priority in organisations, top management must recognise the value of adopting plain language as standard business practice. The representatives emphasised that top management could be more proactive in implementing plain language by making it an inherent part of their organisation. In some instances, top management is willing to make budget and resources available for plain language projects, but plain language has yet to be prioritised.

In one of the organisations, plain language is included in the Trust driver of the company's purpose and customer goals. This allows for plain language to be presented, to a certain extent, within the organisation's business strategy and be included in the employees' KPIs.

The practitioners agreed that plain language has to become a strategic priority at top management level. Top management should not only provide budget and resources but should also make it part of the core culture of the organisation. Plain language should be clearly aligned to the organisation's business strategy and an implementation plan for plain language should be in place.

In Chapter 3, the potential contributions of different organisational role players in implementing plain language as a strategic priority were discussed. The important role that a communication function that operates at a strategic level could play was emphasised.

The research, however, found that in these organisations, the communication function gives little to no input at a strategic level. In Organisation 1 and 3, the compliance department is solely responsible for implementing plain language. Organisation 2 follows a multidisciplinary approach were a number of departments are involved, but the communication department does not play a leading role. Initially, the communication department of Organisation 4 was actively involved in the implementation of plain language in the organisation, but because the department is not strategically positioned these efforts fizzled out. The organisation now follows a silo approach to plain language, which is not sustainable nor successful.

Based on the discussion related to Objective 4, the following implications should be emphasised:

- Plain language can only be implemented as a strategic priority if there is visible commitment from top management;
- Plain language should be clearly aligned to the organisation's business strategy;
- An implementation plan that sets out the responsibilities of each function in terms of plain language should be in place;
- In many organisations, the corporate communication function does not operate at a strategic level, which makes it difficult for the function to play a leading role in implementation.

6.3 RECOMMENDATIONS REGARDING THE GOAL OF THE STUDY

The following framework reflects the synthesis of theoretical principles from Chapters 2 and 3, as well as the empirical results from this study. The framework rests on three stages, i.e. (i) strategic focus; (ii) alignment; and (iii) implementation. It is meant to both help organisations implement plain language as well as stimulate debate on the matter.

Figure 6.2 displays the conceptual framework for implementing plain language as a strategic priority in organisations.

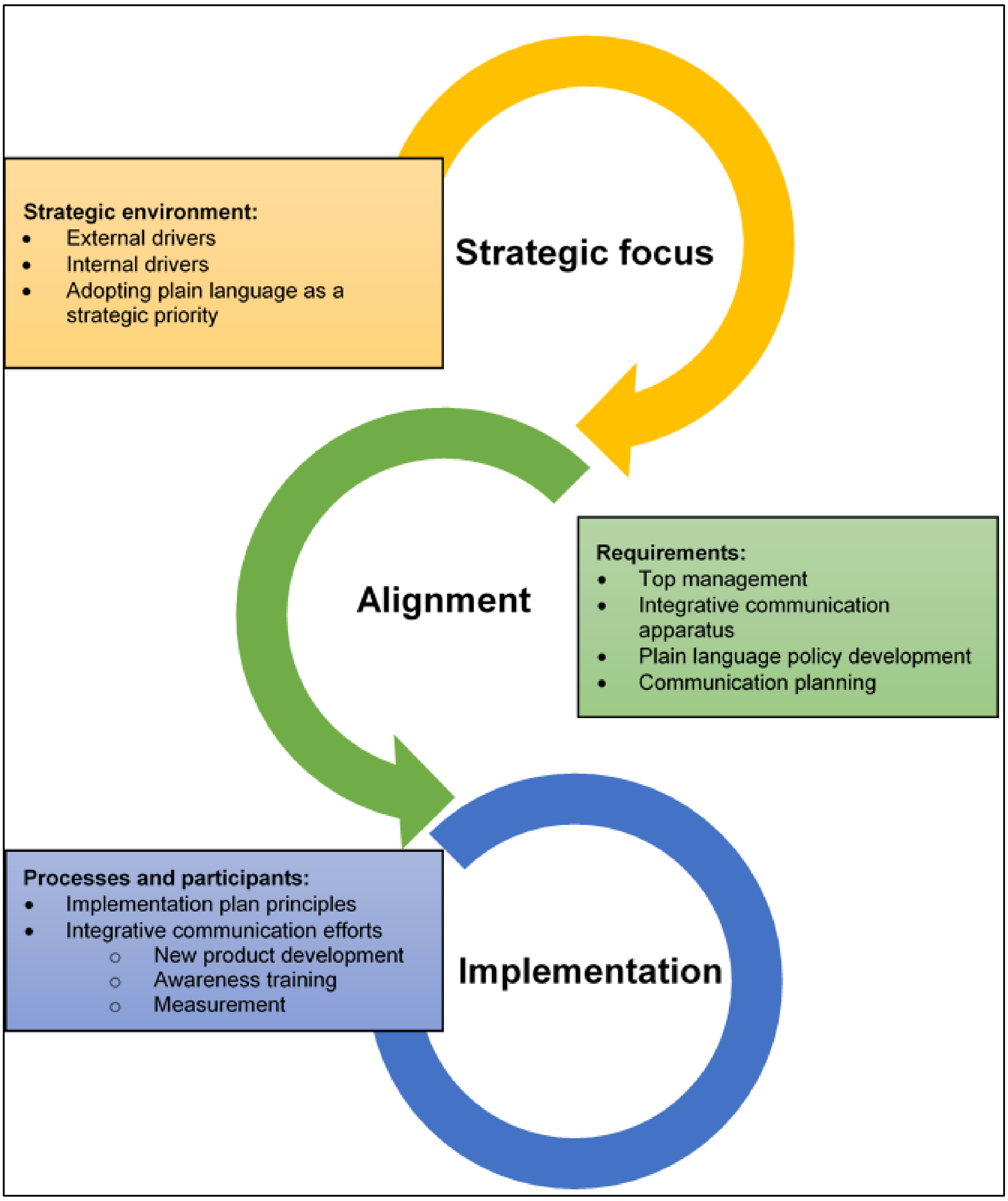

Figure 6.2: Conceptual framework for implementing plain language as a strategic priority

6.3.1 Step 1: Strategic focus

The only way to achieve sustainable implementation of plain language is to approach it from a strategic point of view. The successful implementation of plain language should become a strategic priority for organisations.

Within the strategic environment of an organisation the external drivers for implementing plain language are regulatory policies and customer centricity. The internal drivers are improved employee relations, and effective communication and stakeholder relationships. These drivers act as catalysts for motivating an organisation to adopt plain language as a strategic priority, i.e. part of their standard business practice.

6.3.1.1 External drivers

South Africa is a good example of the many laws and regulations that serve as external forces to emphasise the need to make plain language a strategic priority. Such laws and regulations include the National Credit Act 34 of 2005, the Consumer Protection Act 68 of 2008, the Code of Banking Practice and the Policy Protection Rules for insurance (Burt, 2009:42).

Another external driver is customer centricity, which is critical in a competitive business environment. It aligns a company’s products and services to the wants, needs and expectations of customers (Fader, 2012:9; Consulta, 2018). The use of plain language plays an important role in enabling customer engagement (clear message transfer and facilitating greater symmetry in communication efforts). The use of plain language could thus be viewed as one of the best indicators of an organisations’ customer centricity.

6.3.1.2 Internal drivers

The internal driver for adopting plain language in an organisation is improved employee relations. Plain language leads to transparency, trust and inclusion (Plain Language Institute, 2010; Stephens, 2016). This is likely to have an almost immediate effect on the quality of the relationship between an organisation and internal stakeholders in terms of a better understanding of/easier access to (i) strategic concerns (e.g. values, vision, mission or strategic intent); (ii) operational matters such as policies (e.g. HR issues); and (iii) an organisational culture of transparency.

In addition, mutual understanding, which forms the basis of effective communication and stakeholder relationships, goes hand-in-hand with plain language (Prem, 2014; Nord, 2018:46). These potential advantages would also serve as internal triggers for adopting plain language as a strategic priority.

6.3.1.3 Adopting plain language as a strategic priority

The external and internal drivers mentioned before, would serve as a strong enough motivation for adopting plain language if an organisation really wants to be seen as living the values of transparency and trustworthiness.

Once an organisation has decided to adopt plain language as a strategic priority, it is necessary to determine how plain language implementation would align to the organisation’s current vision and mission, core culture and business strategy. Corporate communication divisions (whether structured more towards the goals of integrative communication or more traditional structures) should assist top management in articulating the strategic fit between plain language and the organisation’s overall business strategy.

To find a logical alignment between plain language and an organisation’s business strategy, the business strategy should be unpacked, e.g. if an organisation’s business strategy is to be more customer-centric it means that the company aims to deliver products and services that meet the needs and expectations of their customers. The only way to determine what customers need and expect from a product or service is to engage with them. The use of plain language plays an important role in enabling customer engagement and it therefore makes sense to implement plain language in an organisation that focuses on customer centricity.

In addition to the logical alignment, the organisation has to develop a clear vision for its plain language implementation. To do this the organisation should ask itself the following questions:

- What does plain language mean for this organisation? How do we define plain language?
- What does this organisation want to achieve with its plain language implementation?

The answers to these questions will serve as a vision and guide the organisation through its plain language implementation. A vision will help the organisation move from where it is currently in terms of plain language to where it wants to be (Bryson, 2004:6).

6.3.2 Step 2: Alignment

Once plain language has been prioritised at the strategic level, top management commitment and communication efforts ought to be aligned. Equal importance is placed on top management commitment and integrative communication, a communication plan for plan language implementation and the development of a plain language policy.

6.3.2.1 Top management commitment

Plain language should be a top down initiative, because it is impossible to implement plain language successfully in an organisation if top management does not demonstrate visible commitment to change (Brockman, 2004:7-10; Block, 2009:8). Top management must therefore make a strong business case for adopting plain language and must set the tone for a culture which will facilitate the implementation of plain language throughout the organisation.

The corporate communication/integrative communication function should further serve as the strategic liaison between stakeholders and the organisation by (i) gathering information on the stakeholders' needs and expectations for plain language; and (ii) transmitting this information to top management.

Without the latter, the alignment between strategic ideals and operational processes cannot be optimal.

6.3.2.2 Integrative communication

Niemann (2005) suggests that a renaissance communicator ought to be in charge of strategic integrated communication efforts. The complimentary nature of corporate communication and marketing needs in a corporate decision such as plain language implementation confirm the relevance of integrative communication. Should organisations not be able to change their structures to support the strategy of plain language and the implementation, they could adopt a temporary role of renaissance communicator to co-ordinate this specific project. This role would oversee the close co-operation between the corporate communication, marketing, customer relations and HR function specialists.

Managerial level integration would focus on (i) including plain language in policies; (ii) developing implementation plans, i.e. plan, research, evaluate and budget for plain language projects as part of the organisation’s integrative communication efforts; and (iii) advising all other organisational functions/departments on the implementation of plain language, e.g. a plain language guide.

At a technical level this type of integration would focus on (i) the development of materials that support plain language, e.g. product and promotional information on different platforms; (ii) employee focused communication; and (iii) working closely with language specialists to ensure consistency.

6.3.2.3 Communication plan for plain language implementation

Communication goals, objectives, messages and implementation activities should be coherent and address the needs of various stakeholders (Steyn & Puth, 2000:60).The focus of any communication planning should be on (i) including plain language in functional strategies; (ii) guiding and supervising employees on adopting plain language in their daily work activities; and (iii) evaluating the organisation's performance in this regard.

Integrative communication efforts to achieve goals and objectives would rely on insights before and during different phases of plain language communication plans from a multitude of internal specialists, i.e. marketing, customer services, compliance, legal and HR. Since plain language implementation requires change at most levels of an organisation, communication efforts will likely be ongoing until research proves that all stakeholders are truly satisfied with an organisation's performance in this regard.

An adequate budget will be critical to achieve these communication goals – a multi-year approach to the issue seems realistic.

6.3.2.4 Plain language policy development

Key decisions that top management should make as part of their annual strategic planning could include the following:

- **Providing budget and personnel resources**

Budget and resources are often identified as barriers to the implementation of plain language in organisations. Therefore, top management has to allocate sufficient budget and resources during the annual strategic planning process.

- **Appointing an external service provider**

It would be beneficial for top management to appoint a plain language practitioner as an external service provider to help guide the organisation through its implementation of plain language.

Plain language practitioners could, for example, assist the organisation with:

- training at different levels and for different objectives;

- converting old documents and developing new documents in plain language;
- developing tools to determine if documents are in plain language; and
- creating awareness of plain language throughout the organisation.

- **Setting KPIs**

Key performance indicators (KPIs) measure how effectively an organisation is achieving its key business objectives. If top management makes plain language part of the organisation's KPIs, plain language becomes a key business objective for the company. To further improve the sustainability of plain language in the organisation, it could also be included in the KPIs and reward structures of individual employees.

- **Deciding on a process for new product development**

Top management must decide how they will approach plain language when the organisation develops new products. It would make sense to include plain language as part of the product development process to ensure that the important product documents such policy wordings and the associated customer communication are developed in plain language from the start.

The organisation should also have a clear process in place to ensure that any new communication that are not specifically linked to a new product are developed in plain language from the start. Templates and a plain language guide could be used as guidelines for the development of letters and other communication in plain language.

- **Establishing a plain language committee/governance structure**

Top management should decide on the best way to ensure the sustainability of plain language implementation in an organisation. A plain language committee or governance structure is the ideal way to do this. The responsibilities of the committee or structure could include the following:

- checking if the organisation's documents comply with the regulatory requirements of plain language;
- signing off on the checked documents that comply the regulatory requirements of plain language; and
- reviewing and adjusting problematic documents that do not comply with the regulatory requirements of plain language.

6.3.3 Step 3: Implementation

Plain language should be implemented consistently throughout the organisation. To do this, the organisation must (i) develop a plan for plain language implementation; (ii) achieve communication integration at a technical level; and (iii) monitor the plain language implementation and measure its success.

6.3.3.1 Implementation plan principles

Any plan should provide a blueprint to ensure the consistent implementation of plain language throughout an organisation. The following principles should govern an implementation plan:

- Specific goals for the implementation of plain language ought to guide and mirror any integrative communication efforts to prepare an organisation for and monitor an organisation on this journey.
- These goals must be based on the key decisions that top management has made as part of the organisation's annual strategic planning process.

6.3.3.2 Integrative communication efforts

To ensure integrative communication efforts, the implementation plan should include a roll-out strategy, awareness training and measurement.

- **Roll-out strategy**

A roll-out strategy sets out the priority areas and the sequence in which plain language will be implemented in these areas, i.e. which communication will be first targeted. A good starting point would be a simple project targeted at solving a business problem (Inslee, 2012). Such a project has a greater chance of success than a large initiative that aims to revise each and every document in the organisation.

The company could for a start take one of their shorter product documents and its associated customer communication through the plain language process with an external service provider who is a plain language expert. This would give them a good idea of what the process entails. If the targeted project is successful, plain language could be extended and further implemented in the organisation.

- **Awareness training**

As was previously explained, top management commitment would be critical and carry a lot of weight in terms of creating organisational awareness regarding the implementation of plain language.

Furthermore, it is important to identify key individuals to be trained and/or mentored before the start of plain language implementation in an organisation. The training and mentoring could be aimed at creating awareness, developing plain language writing capabilities, quality assurance and user testing depending on the needs of the organisation.

External experts like plain language practitioners would play a critical role in this regard.

- **Measurement**

Possible mechanisms to monitor the implementation include a plain language committee or governance team and a sign off process. A maturity model could be used to evaluate the plain language implementation. The organisation could develop plain language tools such frameworks, principles and jargon lists to help them determine if a document is in plain language.

Ultimately, the only way to determine if a document is in plain language is to conduct user testing with the intended target audience (Gordon, 2011). An implementation plan for plain language should include a strategy for user testing. However, it is impossible to test all pieces of communication with customers. Complex documents such as policy wordings and other documents with legal implications should always be formally tested with customers in focus groups. Other communication such letters could be tested informally in discussions with staff or brokers. An organisation could also engage with customers about their expectations of the organisation’s customer journey maps to establish the critical points in the journey where customers require clear communication.

One of the most important, but also the most difficult, aspects of the implementation plan is determining how to assess and demonstrate the value that plain language adds to the organisation. A baseline assessment would focus on how customers experience a particular piece of communication before and after it has gone through a plain language process. Results can then be interpreted in terms of the potential impact on organisational scores for trust, the quality of relationships and/or reputation. In addition, there are a number of mechanisms that could be used to measure customers’ experience of a communication for example complaints, survey feedback, cancellations, rejections of claims and disputes.

6.4 CONTRIBUTION OF THE STUDY

By placing plain language in the rhetorical field of communication, the study attempted to show that plain language has a rightful place as a field of study and that plain language has become the new rhetoric of organisations.

The overall goal of the study was to develop a conceptual framework for implementing plain language as a strategic priority in organisations. The conceptual framework contributes to the academic fields of business management and communication management.

A conceptual framework on this topic did not yet exist in the South African context. The study therefore aims to contribute to how organisations can make plain language part of their standard business practice instead of merely seeking compliance with the regulatory requirements of plain language.

6.5 RECOMMENDATIONS FOR FUTURE RESEARCH

The following topics could be considered for future research:

- The practicality and feasibility of the proposed conceptual framework should be tested with a sample of organisations in the financial sector. The proposed conceptual framework could then be further tested in different industries to refine the framework according to the specific needs of each industry;
- The study focused on the plain language needs of customers as a key strategic stakeholder. The plain language needs of other stakeholders such as employees could be further explored in future studies;
- The findings indicated that user testing is an important, but often neglected, element of plain language implementation. A future research study could investigate and develop an implementation strategy for user testing that is suited for different brand contact points/experiences.

6.6 CONCLUDING REMARKS

The road to successful and sustainable plain language implementation in organisations is not easy. This study investigated the adoption of plain language as standard business practice as a way to achieve sustainable implementation. The investigation led to the development of a conceptual framework for implementing plain language as a strategic priority in organisations. It is envisaged that the conceptual framework will improve the enforceability of plain language and assist companies in making their road to plain language implementation a smoother and thus more sustainable one.

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Appendix A:

Final interview schedule for short-term insurance companies

Introduction and background

The interviewer introduces herself and states the aim of the study – that is to develop a conceptual framework for implementing plain language as a strategic priority in organisations.

The interviewer makes the respondent aware of the following:

- This is an anonymous and confidential interview. You cannot be identified.
- The interview should not take more than 60 minutes to complete.
- The results of the study will be used for academic purposes only and may be published in an academic journal. We will provide you with a summary of our findings on request.

Section 1: Organisational profile

1.1. Please tell me a bit about your company. What percentage of the company's business is:
   a. direct (not sold by brokers)?
   b. personal (not for commercial businesses)?

1.2. What is your position in the company? What are your roles and responsibilities?

Section 2: Strategic management

2.1. Tell me about the company's business strategy and strategic priorities.

2.2. To what extent does strategic planning take place in the company? Is it a formal process?

2.3. Are there different strategic plans for the different business units? How are the plans communicated to the different business units?

2.4. Who do you think is the company's most important (strategic) stakeholders?

2.5. How does the company manage its relationship with these stakeholders?

.

Section 3: Plain language needs of customers

3.1. When a customer chooses an insurance company, what do you think are the main factors that influence their decision? What if pricing and benefits were taken off the table?

3.2. How would you describe an ideal relationship with your customers?

3.3. How does your company retain its customers?

3.4. Do you think your customers have a good understanding of their insurance contract? Why or why not?

3.5. Do you think brokers have a good understanding of their insurance contract? Why or why not?

3.6. Do you have any measures in place to test customer experience?

Section 4: The implementation of plain language

4.1. What is your understanding of plain language?

4.2. How does the company ensure compliance with the regulatory requirements of plain language? Is it a formal process?

4.3. What happens if a document is identified as problematic and difficult to understand? What is the process followed? Who takes the lead and responsibility for changing it?

4.4. How does the company determine if a document (contract, policy wording etc.) is in plain language?

4.5. Did you experience any barriers to the implementation of plain language in the company? What can be done to overcome these barriers?

4.6. Do you measure the value of using plain language? How?

4.7. How is the implementation of plain language monitored in the company?

4.8. What is top or executive management’s role in the implementation of plain language?

4.9. How is provision made for plain language compliance in the company’s business strategy and strategic priorities?

4.10. Do you think the implementation of plain language holds any benefits for the company? And for you? What are these benefits?

Section 5: Awareness of plain language

5.1. On a scale of 1 to 10, how informed are the company’s (1) call centre agents/claims handlers, (2) underwriters and (3) legal department about plain language?

5.2. Does the company have any initiatives in place to create awareness of plain language? Who initiated these initiatives?

5.3. Have any of the employees received training on the principles of plain language? If yes, who did the training and what was taught?

5.4. Does your company have a Plain Language Guide or similar? Who developed it?

Section 6: Service providers

6.1. Do you or the company make use of a service provider for certain plain language services? Which services specifically?

6.2. What is the value-add of using service providers for plain language services in the company? And the drawbacks?

Appendix B:
Final interview schedule for plain language practitioners

Introduction and background

The interviewer introduces herself and states the aim of the study – that is to develop a conceptual framework for implementing plain language as a strategic priority in organisations.

The interviewer makes the respondent aware of the following:

- The interview should not take more than 60 minutes to complete.
- The results of the study will be used for academic purposes only and may be published in an academic journal. We will provide you with a summary of our findings on request.

Section 1: Organisational profile

1.1. Please tell me a bit about yourself and your company. How did you get started in plain language? What plain language services do the company offer?

Section 2: Plain language needs of customers

2.1. When a customer chooses an insurance company, what do you think are the main factors that influence their decision? What if pricing and benefits were taken off the table?

2.2. How would you describe an ideal relationship between an insurer and their customers?

Section 3: The implementation of plain language

3.1. What is your understanding of the term plain language? What do you base your definition on?

3.2. How would you rate organisations like short-term insurers' efforts to comply with the regulatory requirements of plain language?

3.3. What process do you follow to develop/convert a problematic document into plain language?

3.4. How would you determine if one of your clients' documents (a contract, policy wording etc.) is in plain language?

3.5. What barriers do you think companies experience with the implementation of plain language? What can be done to overcome these barriers?

3.6. There is often a lack of buy-in from top management, they don't see the value of plain language. Do you think there is a way to demonstrate the value of plain language?

3.7. What are some of the common misconceptions about plain language and the implementation of plain language?

3.8. Which processes do organisations like short-term insurers follow to monitor their plain language implementation? What advice would you give companies regarding the monitoring of consistency and plain language implementation?

3.9. What is top or executive management's role in the implementation of plain language?

3.10. The drive for plain language sits at different departments in different organisations. Where do you think should the drive for plain language implementation sit in an organisation?

3.11. How can organisations implement plain language as a strategic priority? What advice would you give organisation in this regard?

3.12. What are the benefits of implementing plain language?

Section 4: Awareness of plain language

4.1. What is the role of training in the implementation of plain language? Who should be trained?

4.2. What is the best way to create awareness of plain language throughout an organisation?

4.3. Do you think everyone in an organisation is capable of ‘doing’ plain language?

Section 5: Plain language as a profession

5.1. Have you ever had a bad experience with a client where there wasn’t buy-in or they didn’t get plain language?

5.2. How do you see the future of plain language implementation in South Africa?

Appendix C:
Ethics approval letter

UNIVERSITEIT VAN PRETORIA
UNIVERSITY OF PRETORIA
YUNIBESITHI YA PRETORIA

Faculty of Economic and Management Sciences

RESEARCH ETHICS COMMITTEE

Tel: +27 12 420 3434
E-mail: alewyn.nel@up.ac.za

19 March 2018

Prof AF Grobler
Communication Management Division

Dear Prof Grobler

The application for ethical clearance for the research project described below served before this committee on 9 March 2018.

Protocol No:	EMS071/18
Principal researcher:	**N de Loor**
Research title:	A conceptual framework for the alignment of plain language and strategic management in the short-term insurance industry
Student/Staff No:	11051729
Degree:	MPhil (Communication Management)
Supervisor/Promoter:	Prof AF Grobler / Ms A Leonard
Department:	Communication Management

The decision by the committee is reflected below:

Decision:	Approved
Conditions (if applicable):	
Period of approval:	March 2018 – March 2019

The approval is subject to the researcher abiding by the principles and parameters set out in the application and research proposal in the actual execution of the research. The approval does not imply that the researcher, student or lecturer is relieved of any accountability in terms of the Codes of Research Ethics of the University of Pretoria if action is taken beyond the approved proposal. If during the course of the research it becomes apparent that the nature and/or extent of the research deviates significantly from the original proposal, a new application for ethics clearance must be submitted for review.

We wish you success with the project.

Sincerely

pp **PROF JA NEL**
CHAIR: COMMITTEE FOR RESEARCH ETHICS

cc: Ms A Leonard
Dr E de Beer
Student Administration

Fakulteit Ekonomiese en Bestuurswetenskappe
Lefapha la Disaense tša Ekonomi le Taolo

Appendix D:
Informed consent form

Faculty of Economic and Management Sciences

UNIVERSITEIT VAN PRETORIA
UNIVERSITY OF PRETORIA
YUNIBESITHI YA PRETORIA

Letter of Introduction and Informed Consent
Department of Business Management

Towards a conceptual framework for implementing plain language as a strategic priority in organisations

Research conducted by:

Ms. N. Green (11051729)

Cell: 072 898 3669

Dear Participant

You are invited to participate in an academic research study conducted by Nadja Green, Masters student from the Department of Business Management at the University of Pretoria.

The purpose of the study is to develop a framework for implementing plain language as a strategic priority in organisations.

Please note the following:

- This is an anonymous and confidential interview. You cannot be identified.
- Your participation in this study is very important to me. You may, however, choose not to participate and you may also stop participating at any time without any negative consequences.
- The interview should not take more than 60 minutes to complete.
- The results of the study will be used for academic purposes only and may be published in an academic journal. We will provide you with a summary of our findings on request.
- Please contact my study leader, Dr A. Leonard, at 012 420 3399 or anne.leonard@up.ac.za if you have any questions or comments regarding the study.

Please sign the form to indicate that:

- You have read and understand the information provided above.
- You give your consent to participate in the study on a voluntary basis.

____________________________ ____________________

Participant's signature **Date**