Abstract
Thirty-five years have passed since Chrissie Maher shredded official documents outside the Houses of Parliament in London and began her fight against the use of over-complicated sentences and legalese, thus giving birth to the Plain English Campaign. Since then, the plain English movement has grown especially in English-speaking countries, even if “it took a little longer before plain language principles began to penetrate the legal sphere” (Williams 2005: 169). The present study aims to carry out a comparative analysis to investigate the criteria used in different countries (the UK, the USA and New Zealand) to assess the clarity of language and the usability of institutional and governmental websites which have committed to adopting Plain English and to employing more user-oriented web editing techniques. The evaluative criteria in the three countries, in addition to “people’s choice” surveys, reveal that nonsensical and unintelligible texts justify the presence of booby prizes such as the “Golden Bull”, the “Kick in the Pants” and the “Foot in the Mouth” in the UK, the “WonderMark” in the USA, and the “Worst Brainstrain Communication” award in New Zealand. However, the winning awards and document quality marks now function as controllers and markers of hundreds of documents, multimedia materials and websites, thereby auditing the quality across many large organizations and institutions. In this research, a selection of institutional websites from the three countries will be taken into consideration in order to ascertain whether and to what extent reader-focused uncomplicated communication and user-friendly layout and design succeed in countering gobbledygook and in transforming bureaucratese into clear, intelligible and straightforward texts.

1. Introduction

The American website www.plainlanguage.gov, aiming at “[i]mproving communication from the Federal Government to the public”, provides Bryan Garner’s (2011: xiv) definition for plain English: “robust and direct – the opposite of gaudy, pretentious language. You achieve plain English when you use the simplest, most straightforward way of expressing an idea. You can still choose interesting words. But you’ll avoid fancy ones that have everyday replacements meaning precisely the same thing”. While Garner explains what plain language is and can be, Christopher Balmford (former President of Clarity – the association committed to clarifying legal language – and founder and Managing Director of Cleardocs, which provides plain language online legal company documents in Australia) clarifies what it is not and what it does not do: plain language
is not “mere word substitution”, and does not involve “abandoning legal concepts and replacing them with colloquial expressions” (Balmford 2002: 11-12). The author further explicates (ibid.: 11) that “rewriting a document in plain language involves rethinking the entire document – its content, language, structure, and design – while rigorously focusing on the audience and the purpose of the communication. It is this approach that leads to successful communication”.

This may appear straightforward, direct and uncomplicated. However, when dealing with documents and texts in institutional websites, embedded in a digital framework, things can become more complex. As shown by Denti and Giordano (2010: 27):

[t]he ultimate goal of clarity and comprehensibility can be achieved not only through simplifying written texts in general, avoiding archaic words and passives, nominalization, unnecessary redundant expressions, and reducing sentence length, but also by adopting multimodal tools offered by modern digital communication […]. Therefore, visual and linguistic meaning-making resources, such as colour, use of spatial disposition of objects and texts, blocks arranged horizontally or vertically, all contribute to the text meaning.

The present investigation undertakes a comparative analysis of the criteria used in the UK, the USA and New Zealand to assess the clarity of language and the usability of institutional and governmental websites that have championed plain English as their style of communication and user-oriented techniques for web editing. After giving an outline of the theoretical framework within which the investigation is undertaken, the data of the three countries will be taken into consideration, represented by the three following websites:

1. www.plainenglish.co.uk

The three websites respectively represent three companies in the UK, the USA and New Zealand that provide editing and training services in plain English, along with information on how to apply for the several logos of approval available for official documents or institutional websites, in the public or private sector. They also supply information about the awards which are attributed yearly to various categories of texts, documents and websites for their clarity and accuracy. The three companies’ criteria and guidelines for creating plain language materials on the web will be explored in order to ascertain whether and to what extent reader-focused communication and user-friendly layout succeed in countering gobbledygook, bureaucratese, and legalese, i.e. language containing an excessive amount of discourse-specific terminology and legal jargon. Additionally, some award-winning websites will be considered so as to determine what it is that makes web pages of institutional agencies, public sector and governmental bodies user-oriented and committed to using plain language.

2. Theoretical framework

Over two decades ago Bhatia (1993: 219) had foreseen the necessity of redrafting commercial, administrative and even legal documents “for better accessibility and us-
ability by a larger section of society”. He listed some of the main textual devices that could be exploited in writing documents for public consumption, such as the use of captions, question and answer texts, bulleted lists, logical trees and flowcharts which represent instances of “alternatives to prose” or “non-linear forms”. Bhatia had also foreseen the potential complications of using these kinds of alternative forms in legislative statements or legal proceedings since rewritten versions “can serve the communicative purposes of informing and educating the lay audience but are poor instruments for regulating human behaviour” (1993: 231).

The study by Williams (2005) serves well as the point of departure for the present investigation. His inquiry into the future of legal texts in Tradition and Change in Legal English focuses on verbal constructions in prescriptive texts and provides an account of the Plain Language Movement, from its origins to its later developments in various countries such as the United Kingdom, Eire, the European Union, the United States, Canada, Australia, New Zealand and South Africa. The author underlines that “it is a movement that has taken root, more or less contemporaneously, in all of the major English-speaking countries, from the UK to the United States, Canada, Australia, New Zealand and South Africa” (Williams 2005: 169). Steadman (2013: 41) notes that “Plain English is growing in popularity and application across several fronts, including the legal profession and government legislation” and provides a historical background of the plain English movement in several English-speaking countries. For the purpose of this study, the main and more recent developments in the UK, the USA and New Zealand will be reviewed.

In addition to texts, other elements such as visuals, design and images in general, have to be taken into consideration in dealing with website communication: according to Kress and van Leeuwen (1996: 13) “visual design, like language, indeed like all semiotic modes, fulfils two major functions”. These functions are the ones identified by Halliday, i.e. the ‘ideational’ and the ‘interpersonal’. So both the ‘patterns of representation’ and the ‘patterns of interaction’ are paramount when talking about communication through websites: the ways in which we encode experience visually and we represent the world and the things we do to and for each other through visual communication become essential. Furthermore, the ‘textual function’ is also fulfilled, meaning the way “in which representations and communicative acts cohere into the kind of meaningful whole we call ‘text’” (ibid.: 13-14).

Web pages can thus be analysed as multimodal texts, i.e. texts whose meanings are realized through more than one semiotic code, and where “the parts should be looked upon as interacting with and affecting one another” (ibid.: 183). As will be seen from the analysis below, clear navigation and simple and uncomplicated distribution of text in websites can be accompanied by basic and straightforward design and layout, crucial visuals and background colour and contrast, and all together are deemed to contribute to better accessibility and usability of information and communication.

3. The plain English movement in the UK and the Crystal Mark

From a legislative point of view, a good example of a recent development in the plain English movement in the UK is the ‘Good Law’ initiative, which aims to make legislation more accessible and understandable for British citizens. The Office of the Parliamentary Counsel’s vision statement (https://www.gov.uk/good-law) reads as follows: “The Office
of the Parliamentary Counsel (OPC) would like the user to experience good law – law that is:

- necessary
- clear
- coherent
- effective
- accessible”.

The diagram in Figure 1 sets out criteria for content, language and style, architecture and publication in the form of questions such as “Is this law necessary?”, “Is the language easy to understand?” As regards ‘publication’, the questions asked are: “How will law appear to the online user?”, “What can be done to improve navigation?”, “Should we draft law to be machine-readable?”. This approach reveals the UK Government’s resolution to look at law from the different perspectives of citizens, professional users and legislators.

Figure 1. The Good Law Diagram

The Good Law initiative is in accordance with the UK government’s commitment to openness and transparency and its digital strategy which “sets out how government will redesign its digital services to make them so straightforward and convenient that all those who can use them prefer to do so”, as stated on the web page of the Cabinet Office’s ‘Government Digital Strategy’.

Looking back in history, the UK-based Plain English Campaign started in 1979, and immediately aimed at “removing complicated jargon and language from government documents” (Steadman 2013: 42). Martin Cutts and Chrissie Maher were among the first proponents\(^1\) of a movement which was intended to bring social benefits through the

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\(^1\) Solicitor Anthony Parker’s books, *Modern Conveyancing Precedents* and *Modern Wills Precedents* appeared respectively in 1964 and 1968 and “(w)hen they were published […] they heralded significant changes in drafting style” and “were ahead of their time”, but “the legal profession thought his precedents too radical. They did not catch on. Since the Parker books were published, few precedent books have advocated the same ‘plain’ style” (Butt and Castle 2001: 80).
modification of the communicative function of official texts (Williams 2005: 170). Martin Cutts has worked in the plain English movement since the mid-1970s. He is one of the most experienced plain English editors in the UK. He is the author of Lucid Law (1994 and 2000) and the Oxford Guide to Plain English (2009) and manages the Plain English Commission company providing accreditation of documents with the Clear English Standard and accreditation of websites with the Clear English Standard Winning Website logo (http://www.clearest.co.uk). The Commission was created with “the goal of teaching plain English to governmental and private sector drafters” (Steadman 2013: 42).

Thirty-five years ago, Chrissie Maher shredded official documents in the centre of Parliament Square in London, with her daughter and some other students. Some time later, dressed as the Gobbledygook Monster, she delivered the first copy of the campaign’s magazine ‘Plain English’ to 10 Downing Street and a letter to Margaret Thatcher. As we can read in her biography Born to Crusade, One Woman’s Battle to Wipe out Gobbledygook and Legalese (Plain English Campaign, 1997), by 1980 Chrissie Maher had established the annual Plain English Campaign Awards and “[t]rophies went to those organisations who had tried to communicate clearly and booby prizes went to those who had produced the most baffling public information”. The Plain English Campaign was very active throughout the 1980s and 1990s, and the 1988 leaflet produced by the Cabinet Office and the Office of the Minister for the Civil Service had a foreword by the late Mrs Margaret Thatcher, stating: “If we all wrote in plain English how much easier – and efficient – life would be. It is no exaggeration to describe plain English as a fundamental tool of good Government” (Ager 1996: 133).

Today the Plain English Campaign (PEC) is a commercial editing and training firm, a leader in plain language advocacy. The campaign funds itself through its commercial services to thousands of organizations. Its seal of approval, the Crystal Mark (Fig. 2) was created in 1990, and as the website www.plainenglish.co.uk points out in the “About us” section, it is “firmly established as a guarantee that a document is written in plain English. It appears on more than 21,000 documents”.

The section “How to apply for the Crystal Mark” provides information on how to submit documents for revision and editing. Once the applicant has accepted the estimate of the cost of necessary editing, the document will be amended and reviewed so that it meets the Crystal Mark standard. Another seal of approval is the Honesty Mark, a free logo available to any document displaying a Crystal Mark, which guarantees that everything in the document is true and complete. It can be considered a further certification in that it assures that all advertisements, promotional literature and other documents issued in connection with the edited document bearing a Crystal Mark will not contain misleading information. The Crystal Mark standard expects “each document to

![Figure 2. The Crystal Mark Logo](image)
be as clear as possible for its intended readers” (www.plainenglish.co.uk/services/cryst-
tal-mark/7-the-crystal-mark-standard.html) and fixes some of the rules to be followed
such as the use of ‘everyday’ English, the consistent and correct use of punctuation and
grammar, an average sentence length of 15 to 20 words, explanations of technical terms,
use of lists and headings and a clear typeface.

When it comes to websites, be they institutional or private, the Internet Crystal Mark
logo (Fig. 3) is the ideal way to “prove to the public that you are willing to do everything
practical to make your site crystal clear”, as specified on the website www.plainenglish.
co.uk. The applicant site’s language, accessibility, navigation, design and layout will be
examined, and costs are indicated for joining the scheme. There are also reduced rates
for medium-sized and small websites. Once the review is passed, the application can
be sent in order to be allowed to display the Plain English Campaign’s Internet Crystal
Mark logo on the website.

The starting point is, naturally, plain language and the Plain English Campaign
offers editing services, but not only that. Websites are multimodal texts and, as said
earlier, they deserve particular attention so that the information included is delivered
in the most direct and straightforward manner, avoiding potential misinterpretations
and misunderstandings. The first suggestions of what applicants should do in order to
make sure that visitors to websites can find what they are looking for are given in the
form of questions in a sort of checklist:

- Is your site navigation clear, obvious and simple?
- Have you divided your site into clear sections?
- Can visitors to your site move easily between these sections?
- How easy is it for visitors to your site to work out where they are on it? There are places
  for mazes in this world, but your website is not one of them.
- Is your website ‘easy on the eye’ with crisp, clear text that doesn’t fade into the background
  because of insufficient contrast?
- Are you excluding some of your audience? Have you thought about accessibility?

The list of questions shown above highlights only some of the topics covered by the
plain English website review services. They include topics such as clear and obvious
navigation, distribution of texts in easily reachable sections, design and layout, back-
ground colour and contrast, along with the aspect of accessibility. Advice and instruc-
tional materials are included in the Free Guides section of the www.plainenglish.co.uk
website: general guides such as How to write in Plain English and The A-Z of alternative
words, several specific glossaries, along with Tips for Clear Websites, Design and Lay-
out, updated grammar guides, and even Drivel Defence “a software application which
inspects web pages” (www.plainenglish.co.uk/free-guides.html), “a tool specifically to
help website developers check whether the content of web pages is in plain English” (www.plainenglish.co.uk/drivel-defence.html).

The Internet Crystal Mark holders include the websites of the National Archives (www.nationalarchives.gov.uk), the Scottish Public Services Ombudsman (www.spso.org.uk), the London Borough of Camden (www.camden.gov.uk), Belfast City Council (www.belfastcity.gov.uk), Cancer Research UK (www.cancerhelp.org.uk), the Crime Reduction Centre (Home Office) (www.crimereduction.gov.uk), the Scottish Executive Environment and Rural Affairs Dept (SEERAD) (www.scotland.gov.uk/Topics/farmingrural/Agriculture/grants/Online-Services/18909), among others in a list of about 60, a number which is destined to grow.

The awards, which “are not connected in any way to our Crystal Mark scheme”, as the website explains, include

- **Foot in the Mouth award** (for baffling quotes by public figures)
- **Golden Bull awards** (for the worst examples of written ‘tripe’)
- **Kick in the pants** (draws attention to companies or organizations that need to communicate in plainer English)
- **Media awards** (radio, television and newspapers)
- **Osborne Memorial award** (for a major contribution to the plain English cause)
- **Pat on the back** (celebrates efforts to communicate clearly)
- **Plain English awards** (open category)
- **Plain English communicators** (for clear spoken public communications from an individual or organization)
- **Web award** (for clear and usable websites).

The www.plainenglish.co.uk website further explains that obviously “the contest is open to any website except those that Plain English Campaign’s editing staff have worked on, or those with our Internet Crystal Mark”.

3.1. **Website awards 2013 in the UK: The Woodland Trust website**

One of the 2013 website awards of the British Plain English Campaign went to ‘The Woodland Trust’ for www.woodlandtrust.org.uk. The assessment report recites as follows:

The Woodland Trust is the UK’s leading woodland conservation charity and its website is full of information and images that explain its work. The Trust has just launched this site after consulting with its stakeholders and people within the organisation. Their decision to keep the design and content quite simple has paid off – the site is attractive, easy to use, well written and informative. The content has wide coverage – from ancient woodlands to the proposed HS2 rail link. Information is easy to find so if you don’t know your oak from your ash, this is the place to go. Even the most hardened city dweller will be tempted into the great outdoors after looking at this site.

The website navigation is unquestionably clear and simple, with the information distributed into several sections. The web page opens with a slogan “Enough is enough. Ancient woodland needs full protection”, followed by two boxes through which users can interact with the website. The first box helps users to find Woodland Trust woods, searching by city, town, village or GPS. In the second box, which declares “Our ancient woodland can be saved”, the button **Help us now** guides the users through the several campaigns whilst the **In your community** and **Neighbourhood planning** sections explain...
that “The Localism Act introduced new rights and powers to allow local communities to shape their community by coming together to prepare neighbourhood plans”. Addressing citizens directly and eliciting their collaboration aims at having local communities working together to prevent loss of woods and trees. These pages of the website offer advice and assistance regarding local campaigns. The campaign page reads as follows: “Ancient woodland can’t speak up against the relentless destruction it is currently facing. Please be the voice it so badly needs” and involves users personally asking them to take action and email the Prime Minister and the Forestry Minister directly to urge them to engage in “an open, constructive discussion” on relevant topics.

Scrolling down the home page, under the large introductory image, the core concern of the website is announced by the words “How you can make a difference” (Fig. 4). Then three columns display three further sections, introduced by three phrases in the imperative form, Donate, Become a member, and Plant trees, each of which is endowed with a button, Donate now, Join us and Get started respectively, all of them providing a link to new pages. It must be noted that the use of the pronoun you for the viewer and the imperative verbs create a closer relationship between “the interactive participants” (Kress and van Leeuwen 1996: 119), that is, the producers and the viewers. The How to write in Plain English guide in the www.plainenglish.co.uk website, cited earlier in this paper, explains that imperatives represent “the fastest and most direct way of giving someone instructions”, making interaction direct and immediate.

New information is always distributed in new pages and it is generally subdivided into three sections or columns: three-part items are one of the features of persuasive discourse, for example in politics and advertising, and the subdivision of information into three columns or blocks of text confers a sense of order and organization, given the neat, tidy ordering of the material.

The various sections in the website are easily accessible thus making navigation smooth and straightforward. Natural font colours stand out clearly from a white background while a pale shade is used to distinguish a tree trunk cross-section. A very effective design is achieved with white and a few other colours; the consistent colour scheme throughout the site gives it a more professional look. Pictures and images of trees, woodland animals, landscapes and open air activities all contribute to give a sense of harmony and peacefulness.

Figure 4. The www.woodlandtrust.org.uk home page
Much care and precision is taken with the choice of textual material. Blocks of texts are generally introduced by headings and subheadings and the information is usually distributed into bulleted lists. In the section ‘Plant trees’ for example, users are informed that there are thousands of free tree packs to give away to schools, community and youth groups in autumn and the applications are due to remain open until a certain given date. Information regarding how to get a pack is introduced by the question “Am I eligible for a pack?” which introduces the users to the community plans and makes them reflect on what they themselves can do to participate actively. The criteria to be met by a citizen entitled to receive his or her autumn pack are given in a list. The additional info is provided in the form of a series of questions and answers such as “How do I get a pack?” or “What’s in my pack?”, where first person singular pronouns are used to make all viewers feel they are protagonists in the project. Supplementary data are usually made available to the users through links to other pages or to pdf documents such as the ‘community tree pack guidance document’, downloadable and printable.

Clarity in the language and usability of the several technological tools (links and hyperlinks, downloadable documents, fill-in forms for contact and email) seem to be the most striking features in the various pages of the website under scrutiny. The web page also displays the two buttons ‘Follow us’ and ‘Like us’ for Twitter and Facebook respectively. Additionally, information is easy to reach and locate, making the site user-friendly and instructive, comprehensible and educational at the same time.

As far as accessibility is concerned, an entire page with various sections is dedicated to fonts (text size can be increased or decreased even when using different browsers); colour contrast (wherever possible design and colours are accessible to colour-blind users); navigation aids (a sitemap is provided to assist users); feedback (any comments or suggestions are welcomed especially from those using adaptive technology, i.e. hardware and software which facilitate computer access for people with disabilities).

4. The plain English movement in the USA and the Clear Mark

Williams’ (2005: 174-175) account of the plain English movement in the United States covers the period until the “noteworthy breakthrough” which occurred in 1998 when “President Clinton’s Memorandum on Plain Language was issued requiring all Executive Departments and Agencies to use plain language”. Steadman (2013: 43) reports that the latest development was President Obama’s “Plain Writing Act of 2010”, revised in 2011, according to which the US federal agencies are obliged to write “government documents and notices in plain and clear language that anyone can understand”. The law was signed on 13 October 2010 and by 13 July 2011 the agencies were required to have plans for plain language in place. By 13 October 2011 the documents covered by this law had to be written in plain language. Furthermore, “The Plain Regulations Act” of 2013 (HR 1557 and S 807), whose full title is “To ensure clarity of regulations to improve the effectiveness of Federal regulatory programs while decreasing burdens on the regulated public” is currently under discussion. According to the website http://www.govtrack.us/ which allows American citizens to easily track the activities of the United States Congress, “[t]his bill was assigned to a congressional committee on April 15, 2013, which will consider it before possibly sending it on to the House or Senate as a whole”.

Much of the work on plain language in the United States has been focused on govern-
ment information and 32 states already have a plain language program in at least one agency. Examples include the “Easy-to-Read NYC-Guidelines for Clear and Effective Communication” (http://home2.nyc.gov/html/oath/pdf/Easy-to-Read%20NYC.pdf) created by the Mayor’s Office of Adult Education and the Mayor’s Office of Immigrant Affairs in New York City and the “Plain Language Initiative” campaign promoted by the Los Angeles County’s Quality and Productivity Commission (http://qpc.co.la.ca.us/pl.asp), both complying with the Plain Writing Act of 2010.

Steadman (2013: 42) refers to two private agencies, i.e. the American Plain Language Action and Information Network (PLAIN), made up of federal government employees who have drafted the Federal Plain Language Guidelines to improve communication in federal writing documents; and the Center for Plain Language, a non-profit agency which promotes plain English in the private and public sector. The present study focuses on the latter. The most striking sentence attracting the attention of visitors to the Center for Plain Language’s website (http://centerforplainlanguage.org) is “Plain language is a civil right” on the top right-hand corner of the home page, a concept reiterated in the caption of the picture in the centre of the homepage by the elliptical question “Think that clear information is a right? So do we”. Coping with the difficulties of official and legal documents is compared to looking for a needle in a haystack (Fig. 5) in the blog post “Ever get lost in an official or legal document?” (August 5, 2013) by Don Byrne, formerly Executive Director of the Center for Plain Language, who wrote and reviewed safety regulations and several technical documents for over thirty years.

The “Resources” section includes various links to essential documents such as the “Federal Plain Language Guidelines”, cited earlier in this study, the “Plain English Handbook: How to Create Clear SEC Disclosure Documents”, a comprehensive guide to plain language in financial documents, and the “Plain Language Tools from the Federal Register”, a guide for writing rules and regulations. Additionally, a link to Usability.gov is provided, a source for “government web designers to learn how to make websites more usable, useful, and accessible, including usability guidelines for web content”, focusing on content strategy, project management and visual design of websites. The “Guidelines for creating plain language materials” in the “Resources” page, in the “What is Plain Language?” subsection, include a list of suggestions to follow such as
Identify your audience, Write in active voice, Keep it short, Use personal pronouns, Structure your writing and other suggestions which can be considered general plain language criteria for written documents. This is followed by further criteria which refer to the visual layout of the page and thus take into consideration other semiotic channels. These are criteria that can be applied to websites as well, and incorporate advice such as Use lots of informative headings, Write short sections, and Use vertical lists. Additionally, the Plain Language Checklist in the same “Resources” page considers design important and states that “The Design reinforces meaning and makes it easier for the audience to see, process, and use the information” and suggests using appropriate typography, font size, line spacing, colour, white space, “visuals to make concepts, information, and links easier to see and understand”. Other hints for on-line information include minimizing the number of levels, layering information appropriately, and avoiding too much information on one page.

As the website http://centerforplainlanguage.org states in the Awards page, the Clear Mark awards (Fig. 6), “are given to the best plain language documents and web sites. They are judged by a panel of international experts, following a strict set of criteria. Revised documents were judged on not just the quality of the final document, but also the quality of improvement”.

![Clear Mark Awards logo](image)

Figure 6. The Clear Mark Awards logo

Both the phrases “a panel of international experts” and “criteria” in the quotation above provide a hyperlink to other pages where the list of judges and the judging criteria for documents, multimedia and web can be found. Judges rate each document or multimedia material against several pre-determined criteria. Some of the aspects are considered essential for the three types of texts, i.e. written documents, multimedia and web. In particular, the list of criteria for written documents includes aspects such as “hierarchy” i.e. the distinction between critical and less important information; reduced use of jargon; studied and balanced use of sentence structure, strong verbs, word choice to enhance understanding; and “tone” that ensures reliability, completeness of information and trustworthiness.

The judging criteria for websites are listed as follows:

1. **Purpose** – Is the purpose of the site clear on the home page and does the site stay focused on its purpose throughout?
2. **Design** – Does the design of the website help the user find and use important information easily and quickly?
3. **Structure** – Is content organized in categories that make sense to the user, and is navigation obvious and consistent so it’s easy to find desired information?
4. **Graphics and links** – Are graphics designed and placed to support the content; do links add value to the content?
5. **Language** – Does the entry minimize jargon and use sentence structure, strong verbs,
word choice, and other similar techniques to ensure the audience can read, understand, and use the information?

6. Accessibility – Does the site use best practices to help people who are visually impaired, deaf, or with access only to older equipment which may not handle large files well? (This criterion is especially important for government sites.)

7. Consumer testing – Has the site been tested for usability and does the testing seem appropriate for the intended audience and use of the site? Does the organization track and use performance measures to improve the site?

8. Overall – Is the site successful in fulfilling the purpose for which it was intended?

Once again the criteria for websites cover aspects such as structure, design and graphics and do not disregard other essential factors such as accessibility of files, usability and “obvious and consistent” navigation, which seem to be indispensable and critical for online communication.


Among the 2013 award winners in the website category was AARP, AARP Health Law Guide, http://healthlawanswers.aarp.org/. The American Association of Retired Persons is a non-governmental organization and interest group for people aged 50 and over. The AARP Health Law Answers in particular is a non-profit institutional website providing a simple and fast, seven-step tool that explains how the Affordable Care Act (Obamacare) will affect families and family health insurance.

The home page in Fig. 7 shows a very straightforward layout, simple and user-friendly. The yellow box in the centre of the page invites the users/viewers to use the website through a direct statement “Learn how the health care law works for you and your family”, in a colloquial and informal style. Then the ‘conversation’ continues with “It takes just minutes. Let’s get started”, guiding and leading the users through the various stages.

![Figure 7](http://healthlawanswers.aarp.org/) home page
The seven steps start with the question “What U.S. state or territory do you live in?” which establishes the first stage of a close relationship with the user; knowing the user’s state of origin will help the website to provide the most relevant information. Then the other steps follow, collecting information about gender, age, household (how many people live in the house), estimated yearly household income, tribal status (asking whether the user is a member of a federally recognized American Indian or Alaska Native tribe), insurance (asking what type of current health coverage the user has). The answers to the seven steps generate the report based on what the user said about himself or herself. The seven steps are graphically represented as seven subsequent bus or underground stops leading to the final destination, which is the report: graphics are designed and skilfully placed to support the content.

The content material in the report is reader-friendly: the average sentence length is of about 20 words; the pronoun you is used throughout; information follows a logical order and every paragraph or section is introduced by an informative heading generally preceded by a small icon referring back to the text. The AARP web pages use parallel phrasing as indicated in the Guidelines for creating plain language materials in the Resources pages of the centerforplainlanguage.org website, mentioned above. Examples are:

“You can keep your children on your family plan until they reach age 26 – even if they don’t live at home, are married or attend school” (emphasis added)

and

“There are limits on what your plan can make you pay for your deductible, copayments and coinsurance” (emphasis added).

in which the use of three-part lists helps stating related ideas in similar grammatical form and brings thoughts and concepts together making it easier for readers to understand the document.

The right-hand side of the home page is devoted to additional information which is embedded in a three-line table displaying the various topics at stake, such as a) Factsheets, Tools and More, b) Health Law Facts. Understand the health care law, and c) Health Care Law Timeline. The latter explains the most recent health plans and covers a period which goes from 2010 to 2020. Visuals are crucial; every headline is accompanied and preceded by an icon: the first represents a sheet of paper, the second a scale, and the third a horizontal timeline. The three images reinforce the language iconically. By clicking on each of the links in the table, new pages open up, sometimes providing pdf files to be downloaded with additional relevant information. On top of the table on the right-hand side of the home page, FAQs and a Glossary can be found. The Frequently Asked Questions is a very informative section including questions (and relative answers) on a variety of topics such as “What is the health care law?”, or “How will I know if my coverage is good enough to meet the requirement to have health insurance and avoid the penalty?” or “Is there a tax on real estate sales because of the health care law?”. The Glossary, in alphabetical order, lists the most frequent words used within the field of health care coverage and the introductory sentence is again inviting and reassuring: “Health care is full of terms we don’t use in our everyday lives. Here are some key terms you may come across as you read about health care coverage”.

The design is simple and the colours are kept to the essential, red, yellow and the various nuances of blue. As far as accessibility is concerned, the home page appears very
schematic and straightforward, in consideration of the elderly users who may access it. The website also has a Spanish version; a sitemap is provided; every page can be printed out and all information can be shared on the most common social networks such as Twitter, LinkedIn and Facebook.

5. The plain English movement in New Zealand and the WriteMark

In 1996 the New Zealand Law Commission Manual highlighted the enhanced accessibility and superior cost-effectiveness of plain language legislation (Williams 2005: 176). Recent developments in the plain language campaign are supported by Plain English Power, a network of New Zealand residents promoting the use of plain English in official documents and websites, as explained in their website http://www.plainenglish.org.nz/. Through their slogan “Read it. Get it.”, the Plain English Power network is supporting New Zealand’s Plain Language Bill, sponsored by Chris Hipkins, MP, who champions plain language in Parliament. The Bill was entered in the Members’ Ballot for 2012. Following the American example of The Plain Writing Act of 2010, The Plain Language Bill promotes the use of plain English in official documents and websites and considers “comprehensible information from government” to be “a basic democratic right”. The Plain English Power network states the necessity of legal support for plain language as the standard for all government communications in New Zealand and affirms that “Clear writing from government should not depend on a one-off budget or individual enthusiasts. It should be a permanent, government-wide legal requirement”.

New Zealand’s plain English standard is fixed by the WriteMark, the country’s quality mark awarded to documents and web pages written to a high standard of plain English. The website www.writemark.co.nz explains that a document or web page that carries the WriteMark “is clear and easy to read”, “saves time and money”, “is more likely to win you business” and “builds goodwill between you and the public”. On the page “How the WriteMark came to be”, Lynda Harris, Director of Write Limited, and founder of the WriteMark, explains how New Zealand got its own, internationally recognized document quality mark. After the unsuccessful attempt to introduce the UK Crystal Mark in New Zealand, a document accreditation scheme was created from scratch and the WriteMark was officially launched on 1 March 2005. Various steps are required in order to obtain the WriteMark logo on either a document or web page, including the assessment of the texts against internationally accepted criteria for plain language. If the document does not meet the standard, the feedback provided by WriteMark can be used to make changes and modifications, or WriteMark itself will do the job, and fees will be applied following an accurate estimate of the necessary amendments and revisions.

Sixty-five criteria are used by assessors to evaluate web pages for the WriteMark. The several criteria are split into the nine categories listed as follows:

- Strategic purpose
- Credibility
- Structure
- Content
- Language
- Grammar, proofreading, and style consistency
- Presentation
- Usability
- Links
Aspects such as strategic purpose, structure and navigation are considered as important as the content of the web page. Language is of course a crucial aspect and should guarantee the use of “short, straightforward sentences, familiar words that people use every day, active voice, and appropriate use of ‘you’ and ‘we’”. Punctuation and spelling are also considered, as in any other written document. The visual component is also taken into consideration: elements on the page should be “balanced in relation to their importance and purpose”, information on the page should be unproblematic to read for people with sight difficulties, pages should print easily, and links should be “self-explanatory and not embedded in sentences”, to allow for accessibility and usability.

Many documents are already WriteMark holders, and some of them are worth mentioning such as texts of the Ministry of Justice, including District Court Claim forms in the form of interactive pdfs (Notice of claim, Response by defendant, Plaintiff’s information capsule, Defendant’s information capsule, Application for judgment) and documents of the Jury Service such as “Information for people selected for jury service” and “Information about jury service and being a juror”.

A year after creating a document quality standard, New Zealand’s annual plain English awards scheme was launched. As Lynda Harris, cited earlier, explains, the WriteMark assessment criteria were used as the judging criteria in the first and second annual WriteMark Plain English Awards. The judging process for the 2013 Plain English Awards was completed by the end of the year with the results made public on 3 December at a ceremony in Wellington. Among the plain English criteria for website assessment, the categories Content, Structure, Usability, Sentences and paragraphs, Vocabulary, Layout and presentation are focused on, and the following aspects are given particular consideration:

- The content of the whole page is obvious at the top of the page;
- The structure is clear and logical to the reader;
- Headings are frequent, clear, informative, and easily scanned;
- Sentences and paragraphs are frontloaded, with the important information at the beginning;
- Technical terms are explained;
- Content of pages is visually appealing;
- Body text is in an easy-to-read font;
- Pages use F-design to good effect.

The last point in the list, regarding the F-page layout, relies upon eye-tracking studies showing that web surfers read the screen in an “F” pattern, i.e. seeing the top, upper left corner and left sides of the screen and only occasionally taking glances towards the objects or elements on the right side of the screen. Thus, according to these studies, the most important elements in a website should be placed on the left side of the page.

5.1. The WriteMark Plain English awards winners for 2013: the Accident Compensation Corporation website

The Accident Compensation Corporation web page, www.acc.co.nz/disability, won the New Zealand WriteMark Plain English award in 2013 as the Best Plain English Website in the category of Public Sector/Non-Government Organisation. For the purpose of this study, this web page was analysed as the previous ones from the UK and the USA, i.e. as
an “integrated” text (Kress and van Leeuwen 1996: 183) where different semiotic codes interact and affect one another.

As explained in the introduction to the website (Fig. 8), directly under the large green font headline “Serious injury & disability”, and a green horizontal line, similar to the borders of file folders in a filing cabinet, “New Zealand’s Accident Compensation Corporation (ACC) provides support and services to people with lasting impairments after accidents, like spinal and brain injuries, so they can live everyday lives in their communities”. Then, the text is subdivided into various sections or pages, such as Home, How ACC can help you, Getting involved, Other people’s stories, Support for parents and carers, Useful resources, Common questions and Contact us, each of which can be accessed as opening a file folder in a cabinet file. The home page is subdivided into two main blocks, i.e. the left displaying a picture and the full story of a disability, and the right showing a list of common questions such as “What does ACC pay for?” or “How can I get what I need from ACC?”. The list of questions is followed by a section called “Find information about” where instructions on how “ACC can help you when you return home from hospital or rehabilitation” are provided.

Unlike the home page, the subsequent pages display text on the right-hand side of the screen. The left-hand side is occupied by the two buttons, Scroll up and Scroll down with relative arrows which allow for better navigation and fruition of information. In these informative pages, the text is neatly organized, with short sentences and paragraphs subdivided by headings and subheadings, with the main information or message at the top followed by bulleted lists providing hyperlinks to other pages. Active voice, the pronouns we and you, familiar words and contracted verbal forms such as you’re and you’ll make the linguistic register more informal, even colloquial and conversational.

The layout is extremely simple and light, not overburdened with heavy fonts or graphics. The colour code used is quite simple and straightforward, i.e. green for headlines, black for main text, light blue for hyperlinks and icons. The background is for the most part white. Even images are reduced to a minimum: as a matter of fact, the only pictures are those on the homepage, reinforcing the stories about disabilities of people who resorted to the accident compensation being advertised.
The most interesting aspect on the accessibility side seems to be the attention dedicated to different types of users. Accessibility options range from the possibility to change the background colours (standard, high contrast yellow/black, and black on white) and the text size, the scrolling assistance to view long pages, and a list of access keys to be used instead of a mouse. Additionally, a link is provided to the BBC accessibility website to get suggestions on how to set up a computer to browse websites easily. The BBC website, or My Web My Way, provides a list of ‘how to’ guides, such as “I can’t see very well”, “I’m blind”, “I can’t hear very well”, “I find words difficult”, “I find a keyboard or mouse hard to use”, all of them providing an overview of ways to interact with a computer using different input devices such as switches and touch screens, text-to-speech features, third-party screen readers and talking browsers, screen magnification features, spell-checking software, dictionaries and thesauruses.

6. Conclusions

The present study has tried to investigate, through a comparative analysis, the criteria that three different countries (the UK, the USA and New Zealand) utilize to assess the clarity of language and the accessibility and usability of institutional and governmental websites. Three companies’ websites in particular were considered: www.plainenglish.co.uk for the UK, http://centerforplainlanguage.org for the USA, and www.writemark.co.nz for New Zealand. These companies provide both editing and training services in the plain English context, and a vast array of awards for different categories of texts and documents. The table in Figure 9 summarizes the criteria considered by the three websites: each website uses them to a different degree; i.e. criteria considered central and essential in one website are given less prominence in the others.

<table>
<thead>
<tr>
<th>Summary of judging criteria</th>
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<tbody>
<tr>
<td>• Strategic purpose</td>
</tr>
<tr>
<td>• Accessibility (for visually impaired and deaf; touch-screens; files visible through older equipment; text-to-speech features; talking browsers; screen magnification features; version in a language other than English; sitemap; possibility to share information on social networks; ‘how to’ guides)</td>
</tr>
<tr>
<td>• Design: clear, obvious and simple navigation</td>
</tr>
<tr>
<td>• Structure: division into clear and logical sections/paragraphs/categories</td>
</tr>
<tr>
<td>• Clarity of text, informative and frequent headings, vertical/bulleted lists</td>
</tr>
<tr>
<td>• Grammar, proof-reading and style consistency</td>
</tr>
<tr>
<td>• Language: minimized jargon, technical terms explained, active voice, familiar vocabulary, appropriate use of pronouns</td>
</tr>
<tr>
<td>• Punctuation and spelling, easy-to-read font, spell-checking software</td>
</tr>
<tr>
<td>• Balanced and appealing graphics and visual components</td>
</tr>
<tr>
<td>• Self-explanatory links</td>
</tr>
<tr>
<td>• Frontloading of sentences and paragraphs, important information at the beginning</td>
</tr>
<tr>
<td>• F-design of pages, most important elements placed on the left side</td>
</tr>
<tr>
<td>• Dictionaries and thesauruses</td>
</tr>
<tr>
<td>• FAQ sections</td>
</tr>
</tbody>
</table>

*Figure 9.* Summary of the main judging criteria for plain language in websites in the UK, the USA and New Zealand
The multimodal analysis of the three 2013 award-winner websites, The Woodland Trust for the UK, AARP Health Law Guide for the USA, The Accident Compensation Corporation for New Zealand, has thus shown the great importance given not only to language and content but also to the structure of the text, the page layout, the hierarchies of information, the site maps, and the links and hyperlinks which become crucial elements aiming at a greater usability and easier and trouble-free accessibility, often aided and supported by adaptive technology, to facilitate computer access for people with disabilities.

Obviously, each one of the three companies, www.plainenglish.co.uk for the UK, http://centerforplainlanguage.org for the USA, and www.writemark.co.nz for New Zealand is supporting a more general process of change and evolution in the use and development of plain language in its respective country.

Much work still remains to be done. Despite the evident necessity of further efforts, the work the three companies are conducting in the UK, the USA and New Zealand, as controllers, monitoring bodies and markers of hundreds of documents, multimedia materials and websites and as auditors of quality across many large organizations and institutions, bears testimony to the struggle against complicated communication, gobbledygook and bureaucratese.

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