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The organisation of the plain language movement in Denmark¹

Abstract

I sammenligning med flere af vores nordiske naboer synes klarsprogsindsatsen i Danmark at lade noget tilbage at ønske. Sprognævnene i Sverige, Norge og Finland synes således at spille en langt mere aktiv rolle i arbejdet med at sikre et klart og forståeligt sprog i information fra offentlige myndigheder til borgere. I artiklen argumenterer jeg imidlertid for at klarsprogsindsatsen i Danmark faktisk er ganske betydelig. Den er bare organiseret på en anden måde end i Sverige, Norge og Finland. Jeg identificerer de vigtigste aktører i det danske klarsprogsarbejde: diverse ministerier og styrelser, Dansk Sprognævn, uddannelsesinstitutioner, private konsulentfirmaer der assisterer offentlige institutioner og private firmaer i klarsprogsarbejdet, offentlige institutioner og private firmaer der arbejder for at gøre deres tekster mere forståelige og imødekommende, og (i et vist omfang) NGO'er. En af de centrale pointer i artiklen er at Dansk Sprognævn spiller en mere tilbagetrukket rolle end i de øvrige lande når det drejer sig om det praktiske arbejde med klarsprog i offentlige institutioner og private firmaer. Til gengæld tilbyder en række private firmaer bistand til private firmaer og offentlige institutioners arbejde med klarsprog.

When it comes to the status of plain language, Denmark would appear to be lagging behind some of our closest neighbours. The language councils in Norway, Finland and Sweden all focus much more strongly on plain language than we do in Denmark, and have as one of their main objectives to monitor and improve the written language of public authorities.

The aim of this article is to map the Danish plain language movement by identifying the main players in the field. To some extent, I also provide an outline of how they each contribute to plain language work in Denmark. I will go into some detail in my description of the role of varying ministries and government agencies and the Danish Language Council in the plain language movement. However, my descriptions of the role of educational institutions, private consultants, organisations implementing plain language and NGOs are less detailed. Each of these

¹ In my presentation at the EFNIL conference 2015 in Helsinki, I described the organisation of plain language work in Denmark, and provided an account of the results of my postdoctoral project "Text revisions in practice in the Danish public administration: An investigation of the effect that revising a tax letter has on its readers". In this article, I focus on the organisation of plain language work in Denmark, and hopefully the results from my postdoctoral project will be published elsewhere.

latter groups consists of a number of agencies. For example, the term "educational institutions" covers a number of universities and departments within those universities, as well as other educational institutions. To provide a more thorough overview of how such organisations carry out – and have carried out – plain language work would require individual research, and is beyond the scope of the article.

I will argue that work on plain language in Denmark is not as limited as one might conclude from comparing the plain language work conducted by the Danish Language Council to that of the Swedish, Norwegian and Finnish language councils. To some extent at least, the differences are due to the way plain language work is organised in Denmark.

In Swedish and Norwegian, there is a well-established term for plain language: *klarspråk*, literally *clear language*. However, the corresponding term in Danish, *klarsprog*, is not in common use. It is included in only a couple of Danish dictionaries. Jervelund et al. (2012) define the term as "clear and unambiguous language",² and Jarvad (www.nyeordidansk.dk) defines it as "expressing oneself straightforwardly without beating about the bush." However, both of these dictionaries are edited by employees at the Danish Language Council, and the term is not very common outside the council.

Nevertheless, there is a strong effort in Denmark to make public authorities and private companies write texts that are "good," "understandable," "accessible," "clear" and "accommodating". This effort is often closely linked to a critique of the style of language used by public authorities. As pointed out by Jensen (1998), the critique focuses on two different "stylistic trends." Firstly, the socalled "kancellistil" (literally "chancellery style"3), which is inspired by Latin and German administrative traditions and characterised by long sentences with many subordinate clauses, long adverbials in front of the main clause and a vocabulary inspired by German (cf. Jensen 1998, 36). Secondly, the language that characterises different professional groups, for example psychologists, biologists, economists and architects. Traditionally, employees in Danish public administration have been legal professionals, but over the past few decades, members of other professional groups (such as psychologists, biologists, economists and architects) have become employed in public administration. The language codes of such professional groups have as their primary function to "describe and explain a diverse and concrete reality through generalisation, systematisation and categorisation. This takes place based on underlying professional and theoretical frameworks targeted at receivers of the same background as the sender of the text" (Jensen 1998, 61).

² Unless otherwise indicated, translations are my own.

³ Chancelleries in Danish public administration were abolished in 1848.

In this article, I will refer to the striving towards "good," "understandable," "accessible," "clear" and "accommodating" language and texts as a striving towards plain language. Thus I will assume that the *concept* of plain language is well-established in Denmark, even though there is no well-established *term* in Danish that refers to it.

1. Ministries and Agencies

In 1969, the Danish Ministry of Justice published a set of guidelines on the language of legislation and regulations (Vejledning om sproget i love og andre retsforskrifter). The modern plain language initiative in Denmark began with these guidelines.⁴

The guidelines contain some general views on the language used by Danish public administration. For example, the guidelines begin with the statement that "[w]ith regard to the formulation of the language of legislative texts and regulations, one must keep in mind that everyone the text addresses should easily be able to read and understand it". Alongside such general recommendations, specific wordings and formulations (for example particular phrases and the passive voice) are advised against, and others are recommended. The guidelines are thus more than a general declaration of intent, as they point out particularly problematic features and provide alternatives to these features. Furthermore, these guidelines reject the type of language that was traditionally praised as "the right way" of expressing oneself when writing on behalf of the state administration (the so-called *kancellistil*).

In 1975, the State Information Office (Statens Informationskontor) was established. According to the circular regarding the office, it was to "provide advice and promote exchange of experiences in connection with governmental authorities' information business" (quoted from Hamburger 1988, 153). In 1978, the name of the office was changed to the State Information Service (Statens Informationstjeneste), but the tasks undertaken were basically the same. The circular regarding this service says that it "operates as an adviser to the government authorities with regard to all kinds of information" (quoted from Hamburger 1988, 153).

In 1981, the State Information Service published the closest we have come to a Danish plain language bestseller, the booklet "No beating about the bush, please!" ("og uden omsvøb tak!") (Statens Information 1991). The booklet was first published in 1981 in a style and layout that (at least from a contemporary perspective) is much more inviting than the 1969 guidelines. It was republished seven times, most recently in 1991. The intended audience was employees in the Danish state administration writing all kinds of texts to citizens (rather than just legislation and

⁴ For a historical overview from the time before 1969, see Hamburger (1988) and Jensen (1998, 28-44).

regulations, as was the case in 1969). The sections on words and sentences are inspired by the guidelines from 1969, but are much more detailed. Furthermore, there is a section on how to structure texts aimed at citizens. This means that "No beating about the bush, please!" covers more aspects of texts and the writing process than the 1969 guidelines.

In the Notes of Guidance to the Act on Public Administration (Vejledning om forvaltningsloven) from 1986, the section Drawing Up Notes (Udformning af skrivelser) is clearly inspired by parts of the 1969 guidelines, but is much shorter. Apart from the introductory sentence recommending that "everyone the text addresses should easily be able to read and understand it" (a verbatim repetition of the 1969 guidelines), it says that "[i]n addition to this it [the text] should be phrased in a kind and considerate manner and tone." This addition is quite interesting, as it is explicitly concerned with the tone of the text and the relation that the text creates between sender and receiver. To all appearances, this addition dates back to 1971 when the ombudsman reminded the state administration about the 1969 guidelines. At that time, the ombudsman also added that texts from the state administration to citizens "are likely to be perceived as an expression of governmental attitudes towards complainants, applicants etc.; the text should therefore not only be easy to read and understand, but the linguistic form should also be kind or considerate" (quoted from Karker 1973, 67).

The State Information Service changed its name for the last time in 1991 to State Information (Statens Information), after which it became part of the National IT and Telecom Agency (IT- og Telestyrelsen). Responsibility for the follow-up and development of language in the public sector was then passed to this agency. The National IT and Telecom Agency held a number of seminars on efficient public communication, dealing with issues such as accessibility and language policies in public institutions. The agency also collected a number of language policies from various organisations, compiled advice and guidance for people working with digital communication, and made the materials accessible on the internet. The agency also established the competition Top of the Web (Bedst på nettet), in which the quality of public sector websites was evaluated annually.

The National IT and Telecom Agency was closed in 2011, and the initiatives undertaken by the agency were transferred to the Danish Agency for Digitalisation (Digitaliseringsstyrelsen) who chose to continue the Top of the Web competition until 2013. The competition was then abolished. According to the Agency, they chose to focus on usability and accessibility in the mandatory digital self-service solutions that are being continuously developed in Denmark (cf. www.digst.dk/Moedet-med-borgeren/Bedst-paa-Nettet).

The attempt to ensure usability and accessibility in mandatory digital selfservice solutions is reflected in the guide Good Self-Service (God selvbetjening, accessible at http://arkitekturguiden.digitaliser.dk/godselvbetjening). The guide contains a number of requirements that should be met by mandatory digital selfservice solutions, including a description of the requirements that the language should meet. The requirements are partly a repetition of the content of the 1969 guidelines. For example, writers are recommended to "use a simple and clear language" and to explain "all technical terms". There are, however, also recommendations that are linked specifically to mandatory digital self-service solutions. For example, the solutions are required to "give meaningful feedback on errors," in case a citizen types a piece of information in a field where this piece of information cannot be entered (http://arkitekturguiden.digitaliser.dk/godselvbetjening/ kravbanken/Sprog). Furthermore, text writers are recommended not to use "complicated legal language". They are also recommended to "[e]xplain the law instead of quoting it and provide links to relevant information if there is a need for further elaboration" (http://arkitekturguiden.digitaliser.dk/godselvbetjening/ kravbanken/Sprog). The comments on how to handle legislation are interesting. They seem to indicate that the 1969 attempts to make legislative language easier to understand have not been successful enough to make it possible to actually quote directly from legislative texts.

Plain language has also played a role in the Ministry of Culture over recent years. The Ministry has published two reports about the status of the Danish language, "Language at stake" ("Sprog på spil") in 2003 and "Language in time" ("Sprog til tiden") in 2008. Both reports were written by committees appointed by the Ministry. The intended audience was politicians discussing issues relating to aspects of Danish language, and the reports also aimed to create a public debate about Danish and other languages in Denmark. Both reports included a chapter about language use in the public sector, and they both recommended a continuous effort to improve and monitor the quality of language use in the public sector.

Based on the account above, the story of how plain language has been handled in Danish public administration appears to show an issue that has been dealt with by an impressive number of different ministries and agencies, all characterised by frequent changes of names. One of the most interesting aspects of the story is, however, that plain language - and the related critique of language that is not plain (enough) - has actually played a role in Danish public administration over the last five decades. What is also interesting is how the scope of the task has changed. In the 1969 guidelines, the issue was plain language in legislation and regulations. From 1975, when the State Information Office was established, the scope of the task widened as the focus moved from legislation and regulations to all types of texts sent by the state to citizens. When State Information was closed in 1991, the scope of the task gradually became narrower again, and is currently a question of language use in digital mandatory self-service solutions. (Digital mandatory self-service solutions are indeed increasingly used in the contact between citizens and public institutions in Denmark, although they are certainly not the only channel in use).

2. The Danish Language Council

The Danish Language Council was established in 1955, and is a governmental research institution under the Danish Ministry of Culture. The council has three main functions:

- 1) to monitor the development of the Danish language by, for example, collecting new words;
- 2) to answer questions from public authorities and the general public about the Danish language and language use;
- to investigate the accepted conventions regarding the orthography of the Danish language, and to edit and publish the official dictionary of Danish standard orthography (Retskrivningsordbogen).

Over the years, plain language has received some attention in the Danish Language Council. When drawing up the 1969 guidelines, the Ministry of Justice asked the council for assistance and the guidelines were written in cooperation with the council.

The council has also worked on a number of other plain language issues. In the mid-1970s, the Council made a linguistic revision of a draft for a simplified version of the Danish tax return and its accompanying instructions. This task was undertaken following a request from the State Information Office and the Danish Tax Authority (Statsskattedirektoratet).

In 1973, the Ministry of Housing (Boligministeriet) requested the council to make a linguistic revision of a number of rental contract drafts. An employee from the council returned 48 pages of detailed feedback. In their polite letter of thanks, the Ministry of Housing advised the council that they planned to send future drafts to them for review. The rather exhausted employee who had written the feedback (and who is by now long retired) has added in handwriting on the archived letter "and then we have to start all over again!" This comment suggests that the council did not have the resources to go through the immense number of document drafts from public authorities. Allan Karker, chairman of the Council from 1973-84, decided that the council should not undertake such large and timeconsuming tasks, and left it up to employees to decide if they wished to carry out such tasks in their spare time (personal communication with Pia Jarvad, senior researcher at the Danish Language Council). After this decision was made, the council primarily answered specific questions, for example whether the Patient Insurance agency (Patientforsikringen) should use the formal address De (which is only rarely used in spoken Danish) or the informal form du in their rulings (question from 2008). The council has, however, also accepted larger projects, for example for the Audit Department (Rigsrevisionen) in 2013 and 2015. Out of consideration for the private firms offering advice on plain language (and bearing in mind the resources available at the council), the council restricts itself to larger

tasks that can contribute to the general advice or research carried out by the council. Employees are still free to undertake projects in their spare time.

The council also takes part in the organisation of the plain language conferences held every second year by the language councils of the Nordic countries. The first conference was held in Stockholm in 1998, and the next will be held in Copenhagen in 2017. All the conference reports are accessible at http://ojs. statsbiblioteket.dk/index.php/ksn/issue/archive.

Over recent years, the Council has supplemented its plain language work with an increased focus on research. My PhD thesis (Kjærgaard 2010) reports on two case studies investigating language campaigns in the Municipality of Copenhagen and in the Courts of Denmark, approaching them as organisational change projects. In my postdoctoral project, I tested whether traditional plain-language guidelines actually result in better understanding by readers. This project draws on data from the Danish Tax Authority, which has made an extensive effort to revise its letters to private citizens (Kjærgaard 2015).

3. Educational institutions

To the best of my knowledge, nobody has provided a general overview of the role plain language has played in educational institutions in Denmark – and such an overview would constitute a research project in its own right. In what follows, I present a couple of examples, taking into account both teaching and research conducted at educational institutions.

In 1971, Erik Hansen, professor of modern Danish at Copenhagen University (and chairman of the Danish Language Council 1985-2002), published the book "Ping- og Pampersprog" (the title translates literally into something like "Bigwig and Apparatchik Language") in which he criticises the language of public authorities for being unclear. Since the 1970s, plain language has played a role in the teaching of students studying Danish at Copenhagen University. Currently students at the Department of Nordic Studies and Linguistics (where students of Danish are enrolled) can take an MA degree in language and communication consulting (sprog- og kommunikationsrådgivning). Plain language is not a subject in its own right, but it is touched upon as part of the course Fact Writing and Speaking (Faglig formidling). The aim of this course is to teach students to adapt any text or other communication product to the relevant rhetorical situation and recipient. The goal is to create appropriate and efficient communication using the language, style, composition and genre which most effectively meet the objectives of the communication. The importance of using clear language is dealt with as part of the course (my correspondence with Gitte Gravengaard, associate professor at the Department of Nordic Studies and Linguistics, Copenhagen University).

130 A. Kjærgaard: The organisation of the plain language movement in Denmark

From the 1970s until the beginning of the 1990s, the Danish Language Council contributed to a course about how to write legislative texts ("lovteknik") at the Danish School of Administration (Forvaltningshøjskolen). The Danish School of Administration trains managers and employees with administrative functions in the state administration, regions and municipalities. Accordingly, it was – and is – a teaching institution with significant impact on the training and education of administrative staff. The course was targeted at law graduates who (at least at the time when the course was offered) were not taught to write legislative texts as part of their Danish Language Council). The course lasted approximately a week and the Danish Language Council was in charge of the part of the course dealing with the style and language that should be used in legislative texts. The Danish Language Council contributed to the course until 1993, when the course was discontinued.

At the Faculty of Law, Copenhagen University, students at MA level currently have the option of following a course in Legal Communication and Rhetoric (Juridisk kommunikation og retorik). According to the course description "[t]he course provides a basic understanding of legal text genres and the legal language characteristics and teaches you a critical approach to the traditional legal writing style" (http://kurser.ku.dk/course/jjua55026u/2015-2016). The course is not mandatory, but at least students are being offered an introduction to a critique of traditional legal language use.

As regards research carried out at educational institutions, Kjøller (in press) correctly draws attention to the fact that work on plain language has traditionally been done by linguists from university departments (typically Danish language departments) which had a strong focus on syntax in both teaching and research. In the sense that most plain language work in Denmark is strongly linked to the tradition of syntactic analysis, plain language work in Denmark is based on research. The focus on syntax is, for example, reflected in the recurrent focus on the use of the passive voice as a potentially problematic linguistic feature. In line with this, one of the classic critiques of traditional plain language guidelines (Løj/Wille 1985) argues that advice to avoid the passive voice is highly problematic.

The reach of plain language work was extended dramatically with Jensen (1990, second edition 1998), who emphasises that work on plain language cannot be solely viewed as a stylistic and linguistic problem characterising particular texts. Unclear texts should rather be regarded a symptom of an institutional context that somehow encourages – or at least allows – employees to write in ways that are not appropriate if lay recipients are expected to understand the texts emanating from the particular institution. This perspective is also taken up by Kjøller (1997), Kjærgaard (2010) and Pedersen (2014).

Another line of research that has received some attention is empirical testing of whether texts written in accordance with the traditional guidelines for plain language are actually easier to understand. Wille called for this kind of research as early as 2001. The question is touched upon in Pedersen (2004) and has also been addressed by Danish researchers quite recently: Balling (2013) and Ingemann/Juul (in press) both test whether traditional plain language guidelines make texts easier to understand for actual readers. I have also pursued this topic in my own research, which I conducted at the Danish Language Council (see Kjærgaard 2015).

The examples of research addressing plain language mentioned above are far from an exhaustive overview of plain language research in Denmark. More research has been done, although the amount of research is not exactly overwhelming. However, works published within the last couple of years suggest that the interest in plain language is increasing within the Danish research community.

4. Private companies offering consultancy services

It has been beyond the scope of this article to present an overview of existing private companies offering consultancy services for plain language – not to mention the developments within this field over recent decades. However, as the implementation of plain language in organisations is carried out primarily by private consultants (and not by the Danish Language Council), it would be extremely interesting to subject this area to a closer analysis. Such an analysis could take a quantitative approach by focusing on the number of firms offering consultancy services, the number of employees in the firms, and the amount of time they spend on plain language work as compared with other tasks. The analysis could also take a more qualitative approach and focus on questions such as what different companies consider plain language to be, and how they attempt to implement plain language in organisations. Do they, for example, revise individual texts, or do they plan and carry out language campaigns involving larger parts of the organisation?

5. Organisations implementing plain language

This group of agencies includes at least two subgroups: public institutions and private companies who implement plain language, whether by hiring external consultancy firms or by having employees who are concerned with plain language. Recent research has provided a qualitative analysis of language campaigns carried out in two Danish public institutions, the Courts of Denmark and the Municipality of Copenhagen (Kjærgaard 2010). The focus in Kjærgaard 2010 is on the effects of the language campaigns, both on the texts that were written in

the organisations as well as on the attitudes towards the campaigns among the employees. The text analyses in Kjærgaard (2010) show that the texts written in the two institutions did not change significantly as a result of the language campaign. The results also show that both language campaigns – despite their good intentions – were subject to very strong organisational resistance from some employees. Such individual case studies of public institutions do not do justice to the complexity of the field. For example, the conditions surrounding language campaigns in private organisations are largely unknown. A more quantitative overview of the field could also be useful. For example, it could be interesting to find out how pervasive the striving for plain language is in public institutions and private companies. Is plain language aimed for by most institutions and companies communicating with private citizens, or does the striving towards plain language pertain to particular kinds of institutions and private companies?

6. Non-governmental organisations

Another – at least potentially important – agency in the plain language field is non-governmental organisations. For example, the Danish Consumer Council (Forbrugerrådet Tænk) is an independent organisation responsible for consumers' interests in Denmark. In 2015, they initiated a campaign advocating clearer and more comprehensible language in loan agreements from banks. It has been beyond the scope of this article to explore the extent to which non-governmental organisations promote plain language in Denmark. It is therefore impossible to estimate the significance of such organisations. I am not aware of similar initiatives from other NGOs, but possibly a closer analysis of the field would reveal more NGOs focusing on plain language.

7. Conclusions and implications

The aim of this article has been to map the Danish plain language environment by identifying the main players in the field. In this article, I have demonstrated that particular ministries and agencies, the Danish Language Council, educational institutions, private consultancy firms, organisations implementing plain language and – possibly – NGOs all contribute to the Danish plain language environment. Due to the size of the task, I have not been able to provide a thorough overview of the ways in which educational institutions, private consultancy firms, organisations implementing plain language and NGOs contribute to plain language work in Denmark. Such an overview would constitute one or more separate research projects and accordingly it has been beyond the scope of this article.

The point of departure for this article was the plain language work done in Denmark compared to some of our closest neighbours, that is Sweden, Norway and Finland. In comparison with these countries, the plain language environment in Denmark appears rather lacking in scope. In this article, I have argued that the seemingly smaller and less active plain language environment is due to the fact that plain language work in Denmark is organised in a different way to that in some of our neighbouring countries. The Danish Language Council does not play as active a role when it comes to plain language work in practice as the language councils in Sweden, Norway and Finland. However, much work on plain language is conducted by private consultancy companies and by employees in organisations working with plain language. Unfortunately, this organisation of the plain language effort makes it very difficult to give an overview of the field. For example, it is unclear how many consultancy firms are working with plain language, and it is also unclear how common it is for public institutions and private firms to have employees that are in charge of plain language. This, however, does not change the fact that the Danish plain language environment is richer and more extensive than one could be tempted to conclude by only taking into account the activities undertaken by the Danish Language Council.

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- 134 A. Kjærgaard: The organisation of the plain language movement in Denmark
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