

# Implementing Plain Language as a strategic priority

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# Background

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South Africa is multicultural and has 11 official languages

Business language = English

...but there are only 4,9 million English native speakers out of a population of close to 59 million

# Background

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SA Constitution: access to information is a basic human right

Consumer documents:

- Clear
- Understandable
- Relevant

Especially if English is not the consumer's home language

# Plain Language as a regulatory requirement

The **National Credit Act** (35 of 2005) is part of a comprehensive **legislation** overhaul designed to protect the **Consumer** in the **credit** market and make **credit** and banking services more accessible.

[National Credit Act - The Banking Association South Africa](#)

<https://www.banking.org.za> › [consumer-information-legislation](#) › [national-cr...](#)

To promote a fair, accessible and sustainable marketplace for **consumer** products and services and for that purpose to establish national norms and standards relating to **consumer protection**, to provide for improved standards of **consumer** information, to prohibit certain unfair marketing and business practices, to promote ...

[Consumer Protection Act No. 68 of 2008 - WIPO](#)

<https://www.wipo.int> › [edocs](#) › [lexdocs](#) › [laws](#)

[PDF]

[SCHEDULE POLICYHOLDER PROTECTION RULES \(LONG ...](#)

[www.treasury.gov.za](http://www.treasury.gov.za) › [twinpeaks](#) › [Tranche 2 amendment to the Long-ter...](#) ▼

Dec 15, 2017 - Act; and for purposes of these **Policyholder Protection Rules** ..... of 1 January **2018** and any material change in design of an existing product.

The Financial Advisory and Intermediary Services Act (**37 of 2002**) regulates the activities of all financial services providers (FSP) who give advice or provide intermediary services to Consumers of certain financial products.

[Financial Advisory And Intermediary Services Act - The ...](#)

<https://www.banking.org.za> › [consumer-information-legislation](#) › [financial-a...](#)

Summary of **Treating Customers fairly**

**Treating Customers Fairly** (TCF) is an outcomes based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes financial services **consumers** are delivered by regulated financial firms.

[Treating Customers Fairly \(TCF\) in South Africa](#)

<https://www.banking.org.za> › [consumer-information](#) › [legislation](#) › [treating-...](#)

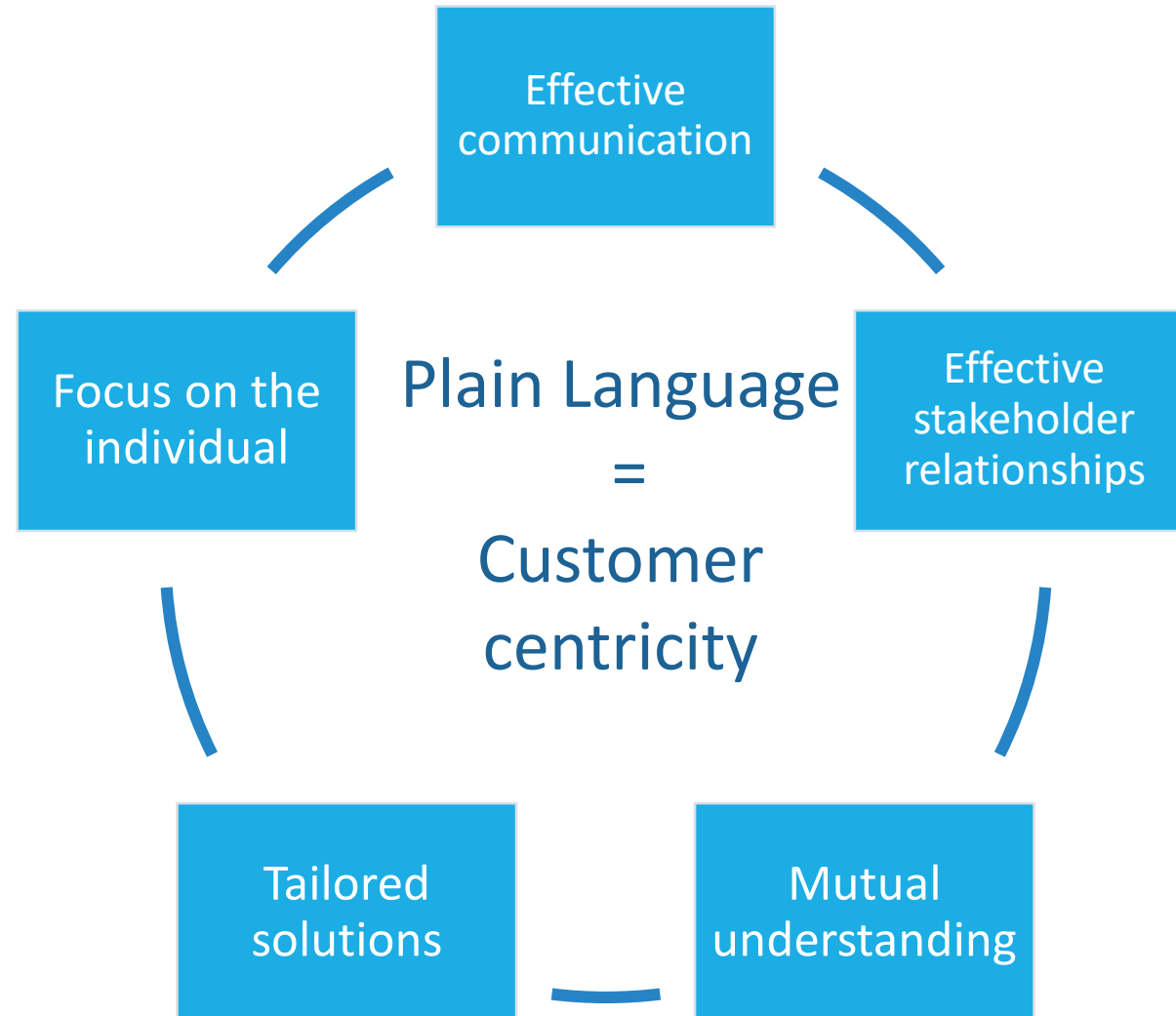
[Code of Banking Practice - The Banking Association South ...](#)

<https://www.banking.org.za> › [banking\\_practice](#) › [code-of-banking-practic...](#) ▼

Search for: Search. **Code of Banking Practice** 2012 - 01/01/2012 - Download. Address. Floor Building D Sunnyside Office Park 32 Princess of Wales Terrace

# Plain Language as a business requirement

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# The problem

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What organisations do:  
Look for quick fixes  
Only want to be compliant  
Superficial concern about  
the customer

Not successful nor  
sustainable  
implementation of  
Plain Language!

# Objectives and goal

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What approaches do organisations follow to implement Plain Language?

How do these align with the strategic priorities of organisations?

Ultimate goal:

Develop a conceptual framework for implementing Plain Language as a strategic priority in organisations

# Sample

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Four insurance companies

(2 representatives involved in the implementation of Plain Language)

Two Plain Language practitioners

(working in the insurance industry)



# Companies

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Insurer 1	Insurer 2	Insurer 3	Insurer 4
Long-term and short-term insurance	Long-term and short-term insurance	Long-term and short-term insurance	Rich heritage in short-term insurance
Large global insurer	SADC countries, China and India	Africa, the UK, Australia and New Zealand	Mostly SADC countries
Partners with large brokering houses and banks that sell their policies	Works with partners and intermediaries; small direct to customer business	Sells products directly to customers	95% broker business, 5% direct business

# Company representatives

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## Insurer 1

- Head of life insurance  
who is also the TCF officer
- Chief customer officer

## Insurer 2

- Head of customer team
- Programme manager

## Insurer 3

- Chief Risk officer
- Head of specialised claims

## Insurer 4

- Communications  
manager
- Programme manager

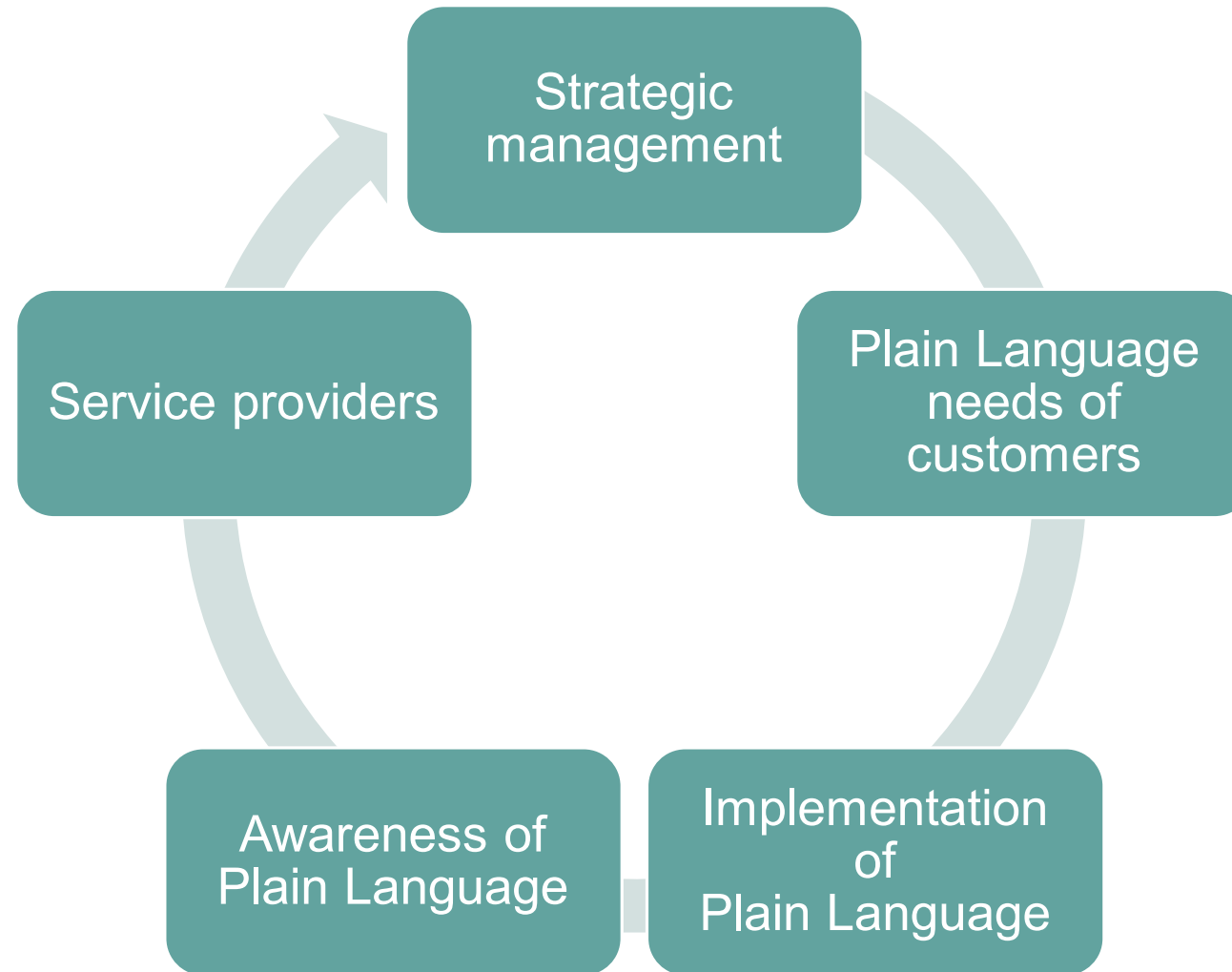
# Plain Language practitioners

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Dr Sarah Slabbert  
Plain Language  
Institute

Candice Burt  
Simplified

# Questions asked to insurers



# Questions asked to practitioners?

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## Insights into implementing Plain Language

Examples:

- How is it implemented and is it considered a strategic priority?
- What is top management's role in the implementation?
- Where should the drive for Plain Language implementation sit?
- How can organisations implement Plain language as a strategic priority?

# Key results: strategic management

Insurer 1	Insurer 2	Insurer 3	Insurer 4
Business strategy in place	Business strategy in place	Business strategy in place	Organisational changes left company without a clear strategy;
Strategic planning takes place annually	Strategic planning takes place annually	Strategic planning takes place annually	forced to work in silos

All the insurers emphasised growth and profitability as important key aspects of their strategy

Also, changing role of customer,  
i.e. customer centricity as an important strategy to remain competitive

# Key results: implementing Plain Language

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Ensuring compliance

Process to develop documents in Plain Language

Monitoring of Plain Language compliance

Strategic alignment:

- Provision made in business strategy and strategic planning
- Top management's role

# How do they ensure compliance?

Insurer 1	Insurer 2	Insurer 3	Insurer 4
Aggressive sign-off process for all customer communication	Communication governance and sign-off process	<ul style="list-style-type: none"><li data-bbox="1319 396 1819 572">• Dedicated resource and sign-off process</li><li data-bbox="1319 586 1819 825">• “The way we conduct our business is by using Plain Language”</li></ul>	Silo approach



# How do they develop documents in Plain Language?

Insurer 1	Insurer 2	Insurer 3	Insurer 4
<p>Process in place:</p> <ul style="list-style-type: none"> <li>• Only for new products</li> <li>• Old policy wordings NOT compliant</li> </ul> <p>For specific problems with wordings:</p> <ul style="list-style-type: none"> <li>• Product owner changes to best of their ability</li> </ul> <p>Active user testing</p>	<p>Process in place:</p> <ul style="list-style-type: none"> <li>• Changed over time</li> <li>• Service provider helped with developing templates, checklists, etc.</li> </ul> <p>For specific problems with wordings:</p> <ul style="list-style-type: none"> <li>• Governance team</li> </ul> <p>Limited user testing</p>	<p>No formal process</p> <ul style="list-style-type: none"> <li>• “Unique” policies</li> </ul> <p>For specific problems with wordings:</p> <ul style="list-style-type: none"> <li>• Stakeholder meeting</li> </ul> <p>No user testing</p>	<p>“There isn’t really a process”</p> <p>For specific problems with wordings:</p> <ul style="list-style-type: none"> <li>• Product owner changes</li> <li>• Sometimes Comm dep and service provider</li> <li>• Takes time and decisions</li> <li>• Budget is also a huge problem.</li> </ul> <p>No user testing</p>

# How do they monitor the implementation of Plain Language?

Insurer 1	Insurer 2	Insurer 3	Insurer 4
No formal monitoring	Formal monitoring: <ul style="list-style-type: none"><li>Initially, external service provider did a communication audit</li><li>Now, the governance team is responsible for determining the maturity of documents</li></ul>	No formal monitoring	Developed a maturity model to track implementation in the different business areas, but the model has not yet been used

# Strategic alignment:

How is provision made for PL in the company's business strategy?

Insurer 1	Insurer 2	Insurer 3	Insurer 4
Not inherently part of business strategy	Sits under Trust driver of company purpose and customer goals	Not inherently part of business strategy	No provision made
Part of TCF and new product development		Company culture, core business has been to make it easy for customers	Plain Language is seen as an "admin overhead", not a priority

# Strategic alignment:

## What is top management's role?

Insurer 1	Insurer 2	Insurer 3	Insurer 4
Held accountable – BUT, not pro-actively involved in implementation	<ul style="list-style-type: none"><li>• Budget and resources</li><li>• Service provider</li><li>• Implementation plan</li><li>• KPIs</li></ul>	Top management gives input into policy wordings	Top management not involved and probably not even aware of Plain Language

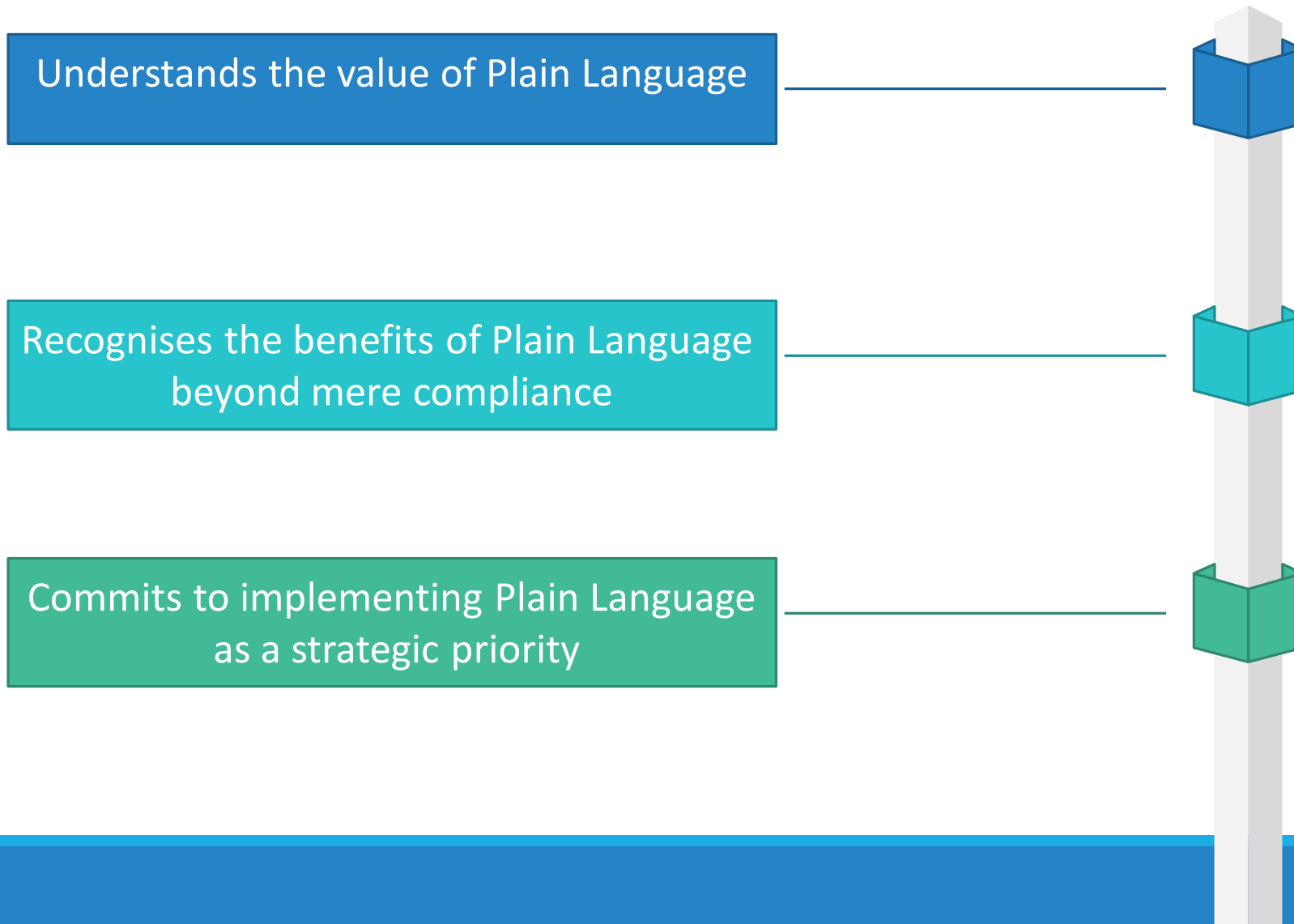
# The framework – three principles

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# Visible commitment from top management

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# Plain Language is prioritised at a strategic level

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Successful and sustainable implementation requires a clear vision for Plain Language



Clear vision

To develop a vision, ask:

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

# Plain Language is prioritised at a strategic level

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Successful and sustainable implementation requires a clear vision for Plain Language



Clear vision

Strategic approach

Successful and sustainable implementation is only possible if it is approached from a strategic point of view

To develop a strategic approach, unpack organisation's business strategy to find a logical alignment with Plain Language

For example, customer centricity



# Plain Language is prioritised at a strategic level

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Successful and sustainable implementation requires a clear vision for Plain Language

Clear vision

Strategic approach

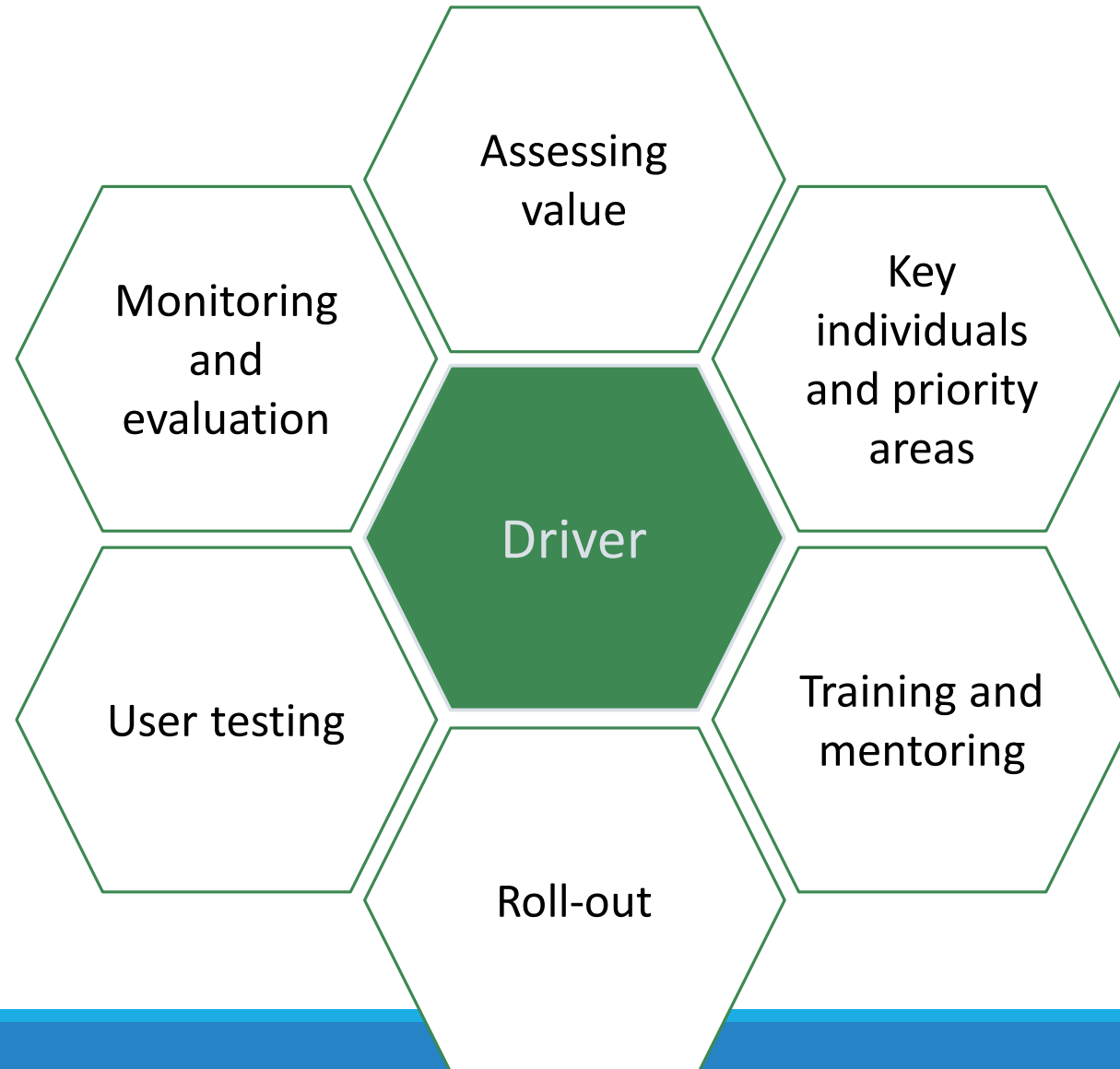
Successful and sustainable implementation is only possible if it is approached from a strategic point of view

Successful and sustainable implementation requires key decisions

Strategic planning



# Plain Language is implemented consistently





The way  
forward

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Thank you!