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## **Working towards clear administrative language in Finland – bilingually**

### **Abstract: Swedish**

Finland har två officiella språk, finska och svenska. Medborgarna har även rätt att välja vilket av de två språken de vill använda i kontakter med statliga myndigheter. De språkliga rättigheterna vid kommunikationen med regionala myndigheter är däremot beroende av om kommunen är enspråkig eller tvåspråkig. På både statlig och kommunal nivå spelar översättningen mellan finska och svenska således en viktig roll för myndighetsutövningen.

Översatta texter är som känt exakt så klara och begripliga som originaltexten är. Därför uppstår frågan om man vid översättning av en text samtidigt kan förbättra kvaliteten på originaltexten. Enligt finländska erfarenheter är svaret ja – vid översättning klarar ofta också ursprungstexten märkbart.

I det handlingsprogram för ett bättre myndighetsspråk som den finländska regeringen lät utarbeta 2014 ingår flera förslag till åtgärder som kan förbättra såväl lagspråket som myndigheternas språk och kommunikation. Här betonas bland annat vikten av att myndigheterna är uppmärksamma på sina textprocesser och den totala textproduktionen. Också översättningen ska ses som en viktig del av produktionskedjan och av kvalitetsarbetet.

### **Abstract: Finnish**

Suomessa on kaksi virallista kieltä, suomi ja ruotsi. Asukkaat voivat käyttää kumpaa tahansa asioidessaan valtion virastoissa. Kunnallisviranomaisten kanssa kielen valinta riippuu siitä, onko kunta yksi- vai kaksikielinen. Jotta viranomaiset voivat antaa palvelut asukkaan kielellä, tarvitaan paljon käännoistyötä.

Käännetyt tekstit ovat tunnetusti juuri niin selkeitä ja ymmärrettäviä kuin lähtötekstinsä. Asiaa voi ajatella toisinkin päin: voiko käänno prosessia käyttää myös alkutekstien laadun parantamiseen? Suomen kokemusten perusteella niin voidaan tehdä: kääntäjien kommentteista on paljon hyötyä virkatekstien selkeyttämisessä.

Hallitus teetti vuonna 2014 Hyvän virkakielen toimintaohjelman, jotta lainsäädännön, asioinnin ja viranomaisten viestinnän kieleen saataisiin parannusta. Ohjelmalla halutaan saada viranomaiset kiinnittämään enemmän huomiota siihen, että kirjoittaminen ja tekstien tuottaminen on prosessi, jonka järjestäminen vaikuttaa merkittävästi tekstin laatuun. Myös kääntäminen on tärkeä osa tätä prosessia.

Over the past few decades, the debate in Finland over clear and effective communication between authorities and the general public has grown increasingly intense. In part, the impetus for this lively debate can be traced to the rise of electronic communication systems and services. At the same time, however,

public authorities in Finland have become increasingly aware of the need to revise their entire text production process. As the amounts of text have continued to grow, so too have the demands for accuracy.

Finland's tradition of producing official, administrative texts in both Finnish and Swedish – the two official languages of Finland – has its roots in the late 19th century. In most cases, one of the two versions of an administrative text is always a translation, and the Finnish and Swedish versions live in symbiosis with each other. Writers who wish to compose clearer administrative texts need to take into account that words and names must work in both official languages. Fortunately, it turns out that using two languages is more than simply a necessary cost – it can also be a clear advantage.

## 1. Intertextuality and power

The main issue affecting plain language use in public communications is the overall responsibility. Who bears responsibility for plain administrative language, and who has the power to implement it? Are all public employees responsible for their own texts? Yes, they are, at least according to an administrative language survey sent out to Finnish political parties in 2011 by the Institute for the Languages of Finland (Piehl 2011).

So politicians seem to think that the best way to work towards plain language is for public employees to be responsible for their own texts. Clearly, politicians are unfamiliar with the conditions under which administrative texts are written. Employees at large agencies and other public organisations, on the other hand, know all too well that the language used in the workplace is a result of more than one person's work. In any given community, the effects of previously produced texts are evident in new texts as well.

Decisions on language use often go beyond the decision-making power of a single agency; linguistic expressions and formats are derived from external sources, such as from legislation, EU regulations or international agreements. Such interlinked and mutually influential texts are known as intertexts, which are capable of forming text chains (cf. Bahtin 1986: 94; Fairclough 1992: 84-85, 103).

Text chains can be seen in cases where terms have drifted from one text to another. For example, the term *SGEI-palvelu* (SGEI services), originally coined in the context of EU regulations, is now in full use in Finland's state and municipal administration. SGEI stands for Services of General Economic Interest. The corresponding Finnish term used in Finnish-language EU regulations, *yleisiin taloudellisiin etuihin liittyvät palvelut*, is too long and unmanageable for anyone to use in Finland. That is why many have turned to the English acronym SGEI. Of course, this is not a good solution, since the acronym may be incomprehensible to Finns.

Intertextuality makes it impossible for each individual public employee to take a decision to improve administrative language. The power lies with those who decide on the texts that are located at the beginning of the text chain. In order to influence the texts, the people involved will often need to make changes in their work arrangements and processes. Many of these changes will require an authority to enact laws, issue administrative decrees and draft guidelines for administrators on how to write and on how to organise the writing process.

## **2. Soft and hard power: adherence to norms and examples**

The power to set norms that dictate how language should be used or written could be likened to hard power, a concept developed by Joseph Nye, an American political scientist (cf. Nye 1990; Piehl 2016). Nye uses hard and soft power as concepts to describe intergovernmental relationships of power and influence. He highlights the potential of soft power compared to hard power. For instance, states can gain influence through means other than coercion, such as through appeal and attraction, or by presenting a persuasive example of a recommended course of action.

This same phenomenon can be observed in the task of improving administrative language. Legislation and regulation are not always the most effective methods. Norms are sometimes followed only formally, which basically undermines their desired impact. Soft power, on the other hand, especially the power of example, can arouse true motivation to really transform established practices.

Through soft power, the language use of just one public employee, one unit or one agency can affect the entire administrative language, provided that people want to follow their example and no norms stand in the way. For example, a few years ago the Social Insurance Institution of Finland started using the informal singular form of address (*sinä*) in its official client letters. The move was met with much appreciation, and many other public agencies in Finland have since followed suit.

Success stories, encouraging feedback, positive publicity and increased operational efficiency can convince other agencies of the benefits of improving their administrative language. And when clear administrative language becomes standard practice, it can eventually be adopted as a binding norm.

## **3. Governments and private organisations tasked with plain language work**

Plain language work is organised in different ways across different countries. Some countries, such as Finland, Sweden, Germany, Switzerland and the United States, have enacted statutes that oblige public authorities to use clear adminis-

trative language. In Anglo-Saxon countries such as the UK, the United States, Australia and New Zealand, the government buys plain language services from private organisations, foundations and companies.

There are also countries where government agencies or national institutions for language (such as EFNIL members) take care of the plain language work. This approach is used in the Nordic countries and Estonia, and in Germany and Switzerland in the case of plain legal language. Of course, these countries also have organisations and companies that provide public authorities with plain language services. It is necessary to have a broad range of plain language service providers, since plain language principles can be designed both top-down and bottom-up, using both hard and soft power.

#### **4. Institute for the Languages of Finland – an expert in administrative language**

The Institute for the Languages of Finland is a public agency responsible for the language planning of Finnish and Swedish, the two official languages of Finland. This responsibility also includes working towards and promoting clear administrative language. The Institute has helped public authorities improve their language use ever since the 1970s, when the movement to improve administrative language really began to spread. The Institute was a member of the Committee on Administrative Language, a state working group appointed in 1979 to explore means to make administrative language in Finland more understandable.

The recommendation by the Committee formed the basis for Finland's first statute concerning the quality of administrative language, that is, the Decision on Administrative Language adopted by the Finnish Government in 1982. The decision effectively appointed the Institute for the Languages of Finland as the official expert organisation for administrative language planning in Finland. Later, in 2003, the obligation stated in the decision was included in section 9 of the Administrative Procedure Act as a "requirement of proper language". It stipulates that "an authority shall use appropriate, clear and comprehensible language" in both Finnish and Swedish.

#### **5. Swedish Language Board**

The Swedish Language Board, established in 1960, is a coordinating body under the Prime Minister's Office with more than 55 years of experience in fostering clarity and comprehensibility in the Swedish used in Finland. At first, the Board had only limited power, because it served for an undefined term without officially set tasks or working methods. It was not until 1988 and a new government resolution that the Board acquired permanent status as a language planning body with prescribed tasks. At the same time, a representative of the Institute for the Lan-

guages of Finland was appointed to serve on the Board. The Board was tasked with drafting guidelines and rules to combat linguistic inaccuracy and poor-quality translation from Finnish into Swedish. The Board was also given responsibility for harmonising Swedish legal language in Finland.

Today, the Swedish Language Board continues its work to coordinate the revision and translation of legal language and to issue recommendations on proper writing, style and terminology. The recommendations are published in a bulletin on language guidelines (*Språkråd*) and above all in a handbook on Swedish legal language (*Svenskt lagspråk i Finland*, or *Slaf*), which has become the most important linguistic aid for anyone who, using Swedish, drafts, writes or translates laws and other decrees in Finland. The recommendations issued in the handbook are applied by, for example, the Finnish Government, the Unit of Legislative Inspection at the Ministry of Justice and the Parliamentary Office. The handbook is essentially the go-to guidance for just about anyone who writes and translates Swedish language texts of a legal and administrative nature in Finland. The first edition of the handbook was published in 1986 and the fourth edition is due in 2016.

## 6. Government Administration Department

The Government Administration Department, a provider of joint administration and specialist services to Finnish ministries, is the latest official body to be established with direct influence over the quality of administrative language in Finland. Among other things, the Department, which was established in 2015, was tasked with overseeing the quality of administrative language at the various ministries.

The Department includes the Translation and Language Division, which is further divided into the Swedish Language Unit, the Foreign Languages Unit and the Language Services Unit. The Swedish Language Unit is the largest of the three units, responsible for functions such as translating government proposals, decrees and documents required in government and ministerial policy-making. The Unit also translates texts into Swedish for the Office of the President of the Republic of Finland.

The Foreign Languages Unit translates texts mainly into English but also into Russian and other languages. Translation of Finnish legal texts into English accounts for an important part of the Unit's work. Taken together, the Swedish Language Unit and the Foreign Languages Unit translate between 60,000 and 90,000 pages each year. Translation into Swedish accounts for 60 per cent, translation into English for 30 per cent and translation into other languages for 10 per cent of the total volume.

The Language Services Unit houses terminologists and language technology specialists. The Unit performs valuable work to compile and develop terminology in several languages within government administration and to build terminology and text databases.

## **7. Action plan for clear administrative language**

The past five years have been exceptionally busy for plain language professionals in Finland. Some time ago, the Institute for the Languages of Finland made the observation that the requirement of proper language, as stated in the Administrative Procedure Act, had not been sufficiently met. The Institute therefore urged the Finnish Government to take action to improve administrative language use. In the run-up to the 2011 parliamentary elections, the Institute launched a campaign to encourage the Government to include clear administrative language in its programme.

The lobbying worked, and the new Government appointed a working group to draw up an action plan with proposals on ways to ensure that administrative language is clear, appropriate and comprehensible. The action plan for clearer administrative language was completed in 2014 (Hyvän virkakielen toimintaohjelma 2014; see also Piehl 2014). The working group behind the plan consisted of representatives of agencies, universities and organisations and was chaired by Professor Pirkko Nuolijärvi, Director of the Institute for the Languages of Finland. One group member, the secretaries and the specialists were also from the Institute.

The action plan was based on a number of surveys carried out in both Finnish and Swedish. The surveys explored the use of administrative language practices in central and local government. They also looked at how language use is taught at higher education institutes. Additionally, the working group carried out a survey of people's views on and experiences of administrative language in Finland.

The objective of the action plan for clear administrative language is to shift the focus from individual texts and language design to the prerequisites and circumstances for writing. The idea is to make public authorities conscious of the fact that language is an essential element of their administrative work. Authorities should set goals for their language use and monitor the progress of those goals, just as with other important operational areas.

In addition, the action plan encourages authorities to be active and to strive for increased collaboration within the framework of language use. In all, the plan lists 28 proposals and recommendations. Ten are aimed at individual agencies, eight at public administration as a whole, five at the Finnish Government and five at educational institutes.

## **8. The recommendations of the action plan**

To improve the prerequisites for good writing, the plan includes a proposal to introduce an act on place names and to build a joint terminology and text database for public authorities. The proposal is targeted at the Finnish Government and government administration, because it cannot be realised without their decisions to support it. Official decisions are also needed to draft common rules of pro-

cedure on the formulation of names, terminology and job titles as well as joint guidelines on clear legal language. The Institute for the Languages of Finland has already teamed up with the Ministry of Justice to draw up instructions for those who draft laws.

The action plan also proposes that the Finnish Government should launch a campaign to increase awareness of the plan's proposals. The Institute for the Languages of Finland ran such a campaign in 2014-2015 in collaboration with the Prime Minister's Office, the Ministry of Finance and the Ministry of Education and Culture. The campaign succeeded in encouraging many agencies to take action for clearer administrative language. During the campaign, a number of agencies were recruited to try out recommendations and disseminate information on their work to improve administrative language. Examples of good practice were collected with a competition that awarded prizes to the best improvements made to administrative language.

## **9. Individual agencies and local government**

The action plan is also aimed at encouraging individual agencies to change their internal procedures and incorporate clear administrative language visibly into their operational planning and evaluation processes. The recommendations have been summarised into a set of house rules for agencies to use. The list of rules can also be viewed as a process that starts with setting goals for language quality and outlining a plan to achieve those goals. This is then added to the same documents that include objectives and measures concerning the agencies' other operations.

Agencies are urged to appoint a coordinator for clear administrative language and set up a clear language team, so that everyone will know who to turn to. The team can then analyse what kind of help the agency's staff will need to produce good texts, add guidelines to the agency's intranet and organise training on clear language use.

## **10. Include text writing in process descriptions, implement routines for feedback**

The action plan also advises government agencies to take into account texts and clear writing in their process descriptions. Most agency functions usually include some drafting of texts. Decisions, evaluations, plans, etc. are all produced in text format, yet process descriptions rarely take account of the stages involved in writing the texts.

Translating texts, coining new terms or names for organisations, collecting feedback on and monitoring the performance of texts, and revising texts are all important and indispensable stages of any operational process. An organisation's

process descriptions should reflect this, but they seldom do. In 2012, the Finnish Ministry of Justice published a process description for law drafting that, following a proposal by the Institute for the Languages of Finland, explicitly mentioned translation and planning of measures concerning the language of translations as stages required in drafting new laws. The agencies that participated in the campaign for better administrative language, in turn, decided to include translators in teams that were tasked with text revision.

The action plan further suggests that individual agencies should implement strategies to make text drafting easier by taking language planning into consideration when acquiring new text production systems. It is important to make sure at an early stage that the texts used in such systems can be easily edited without undue costs or effort.

The plan highlights the importance of monitoring and ensuring the quality and performance of texts. Feedback should also be collected in many different ways from a variety of sources. In multilingual administration, it is well worth utilising the expertise of translators in improving administrative language. A number of Finnish agencies have done so successfully. Agencies could still, however, focus more on making giving and utilising feedback part of their routine processes.

When setting out to improve texts in the workplace, it is often a good idea to consult all members of the organisation. Customer service staff, for example, will know what types of expressions often need to be explained to customers. In particular, new employees should be encouraged to give feedback on old, accustomed linguistic mannerisms. The advantages of feedback should be discussed openly, so that everyone will understand that proposals for improvement are not intended to question the writer's competence.

## **11. Use easy-to-read language and illustrations where necessary**

Sometimes the situation calls for more than just plain language. There are various special groups of people – older people, young people, immigrants and people with disabilities – that may need simplified, easy-to-read language. The action plan for clear administrative language reminds government agencies to consider the need for using easy-to-read language on a case-by-case basis. For example, one of the prize winners in the clear administrative language campaign was a large hospital that had started to use easy-to-read language in all of its patient communications. The hospital had received much positive feedback about its decision.

The action plan also proposes that agencies increase their use of visual means to present and describe complex permit or application processes. Lastly, the plan urges officials and agencies not to produce unnecessary texts. Spending time on



the writing process rather than rushing through it also hugely improves text quality. That is why the action plan suggests that agencies should produce fewer and shorter texts to allow more time for the drafting of important texts and other work.

## 12. Clear communications builds up confidence in authorities

In today's Finland, the public's trust in government authorities rests upon soft rather than hard power. The administrative language traditionally used in Finland is often nothing less than an obstacle to good communication with the general public and even between authorities. Many Finnish authorities now aim at producing understandable and reader-friendly texts so as to make their official communications and work easier. The argument that communicating in a way that can be generally understood somehow chips away at the communicator's authority just doesn't stack up. After all, public administration can only gain its legitimacy by attending to the affairs of the public efficiently and smoothly.

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