

Communicating the Law and Public Information to Vulnerable Audiences: Contexts and Strategies

Editorial

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Abstract. Vulnerable categories are the most affected by legal issues and at the same time the ones who face more barriers in accessing legal and public information. The contributions for this special issue of JOAL deal with this matter presenting reflections, methods and strategies that can help to overcome this situation.

Keyword: Vulnerable audiences, Access to law, Access to public information, Web accessibility, Legal language, Easy-to-read, Visual communication, Legal design.

1. Introduction

Today the law and its consequences impact all citizens and their activities and affect nearly every aspect of our lives, including health, employment, education, housing and entrepreneurship. For this reason, in the course of their lives the majority of people will find themselves faced with problems related to legal and justice issues, or even more commonly dealing with the procedures of the public administration. Legal and administrative matters are ubiquitous, they flow from daily life and are experienced by many every day (OECD, 2019).

As a result of this, the possibility to access legal and administrative information is a fundamental factor in being able to manage legal and justice needs, to know your own rights and duties, and fully participate in society. For this to happen, however, it is not enough to guarantee concrete availability of the law, but it is necessary to ensure that every citizen has access to real knowledge and understanding of legal and administrative information (Tiberi and Ninatti, 2017).

As the promulgator of laws, it is the government that has the primary duty to promote the rule of law (Doherty, 2020). Good legal communication from administrative bodies is therefore essential for public life to function at all levels. Unfortunately, legal texts often lack the clarity that a citizen would need to act upon that information. Its specific jargon marked by grammatical, lexical, and idiomatic characteristics makes official texts hard to comprehend for many people (Nuolijärvi and Stickel, 2016). This issue is a problem common to many countries, so much so that there have been founded international organizations, such as Plain Language Association International (PLAIN), Clarity International and the Center for Plain Language, that for years have been committed to promoting clear communication and plain legal language and which are represented in more than 30 countries.

Even if legal needs are not exclusive to any category of citizen, some categories are disproportionately affected, leading to further disadvantage and inequality such as poor, marginalised and weak populations, including women, youth, disabled people, indigenous and migrant groups. These groups may experience additional legal needs and face extra barriers in accessing legal and justice services based on their socio-economic situation. There is, in fact, increasing evidence that disadvantaged groups are typically those that are most vulnerable to legal problems, resulting from additional burdens caused by these same circumstances. (OECD, 2019). Surveys showed that legal problems cluster and are often the result of other problems. For example, a medical problem can lead to economic, social and legal problems (Currie, 2007).

This vulnerable population could find themselves in situations or conditions that make it more difficult to access traditional communication and information systems or may find it harder than others to read and understand standard legal information.

The objective of this special issue is to gather experiences and reflect on the methods used and the results obtained in the communication of legal and public information to vulnerable categories.

This issue includes both theoretical considerations and insights from practical experiences and on the ground research projects.

2. Who is vulnerable?

There is no universal way to identify the vulnerable part of the population. Vulnerability could be viewed from various perspectives, focusing on health and sickness or hardship and growth as connected to community resources. (Havrilla, 2017)

Vulnerable groups are those with a higher risk of suffering from social and health problems derived from inequalities based on their physical, economic and social conditions with regard to the general population. (Rukmana, 2014)

According to the definition provided by the European Commission¹, vulnerable groups are the ones who experience higher risk of poverty and social exclusion compared to the general population. These marginalised groups include but are not limited to people with disabilities, migrants and ethnic minorities, homeless people, ex-prisoners, drug addicts, people with alcohol problems, isolated older people and children. The problems are often translated into homelessness, unemployment, low education, and subsequently, further exclusion from society.

The definition of "vulnerable" can also be seen from a point of view that mostly takes contextual conditions into account, as underlined by the City of Toronto (Specialized Program for Interdivisional Enhanced Responsiveness, 2015) that sees vulnerability as a gap between the challenges a person faces and the resources they can access when dealing with those challenges. Vulnerability must be considered in context – a person's vulnerability will depend on their circumstances, environment and resources in the broadest sense.

Another interesting definition of vulnerable categories is the one provided by Robert de Rooy², one of the keynote speakers at the international conference "Access for All 2020"³ given during the session "Using Plain Language to protect the rights of vulnerable populations", which also frames vulnerability in a contextual condition.

My feeling is that we are all vulnerable, it just depends on the context and some people are just in situations where they are exposed to circumstances and contexts which increase their vulnerability. [...]. At the same time, a person who doesn't seem to be a classic vulnerable case, can become vulnerable when they suddenly become ill or they are very afraid because they have to do a medical procedure and their ability to understand what's going on gets constrained. For me vulnerability is contextual, and it exists on a spectrum [...], the far end of the spectrum is where vulnerability is more obvious (de Rooy, 2020).

Vulnerability is in fact a universal concept. Everyone is potentially vulnerable and will deal with vulnerability in different ways (Havrilla, 2017)

In relation to the specific issue of understanding written content (like legal information), vulnerability can be connected to cognitive and learning disabilities including long-term, short-term, and permanent difficulties relating to cognitive functions such as perception, memory and attention, learning and orientation and visual, verbal or numerical thinking. Information design, structure and language features can make content inaccessible to people with cognitive and learning disabilities or accessible with great difficulty. These

¹ See https://ec.europa.eu/employment_social/2010againstpoverty/extranet/vulnerable_groups_en.pdf

² Robert de Rooy is an attorney and the developer of the Comic Contract. See <https://creative-contracts.com/>

³ This online conference was hosted by Clarity International, the Center for Plain Language, and Plain Language Association International (PLAIN), 13-15 October 2020. See www.accessforallconference.com

difficulties may sometimes also be experienced by users in the general population due to environmental or situational barriers. However, for users with cognitive and learning disabilities, these difficulties are likely to be persistent and significant. As a result, they could be unable to access content and act upon this information independently (Lee et al., 2020).

Recent immigrants are another group that can be considered vulnerable with regard to understanding written material, particularly of the legal kind. Difficulties stem not only from linguistic obstacles but also from having a different cultural background (Conti et al., 2019).

Vulnerability in accessing written information is then generally connected strictly to literacy. Literacy is the knowledge and skills needed to understand and use information from text and other written formats⁴ (ALL, 2008) and involves a continuum of learning to enable individuals to achieve their goals, develop their knowledge and potential, and participate fully in their community (PIAAC Literacy Expert Group, 2009). Countries differ markedly in the literacy achievement of their adult populations, but none does so well as to claim no literacy problems (OECD, 2000). Literacy skills are in turn connected with legal capacity that is defined as the personal characteristics or competencies needed to resolve legal problems effectively. It generally involves capabilities across a number of domains including sufficient cognitive, communication and literacy skills to successfully seek and obtain legal information (McDonald and People, 2014). Legal capability deficiency cuts across all priority groups and problem types (OECD, 2019).

3. Barriers to access legal and public information and how to overcome them

3.1 Web Accessibility

The first barrier that can be encountered for some vulnerable categories in accessing legal information, which is now almost exclusively communicated via the web, is a digital barrier: technical obstacles that do not allow everyone to access websites regardless of their disability.

The Web is fundamentally designed to work for all people, whatever their hardware, software, language, location, or ability. When the Web meets this goal, it is accessible to people with a diverse range of hearing, movement, sight, and cognitive ability. However, when websites, applications, technologies, or tools are badly designed, they can create barriers that exclude people from using the Web” (Shawn, 2019)

The topic of web accessibility is tackled in this JOAL special issue by O'Neill. In introducing his paper, he highlighted that it should be clear to designers that disability is a multidimensional concept and moreover it is not a static concept because disabilities can be permanent or temporary but also situational.

As also indicated by Nielsen (2005), distinguishing between users with and without disabilities as if that were a dichotomy is an oversimplification. It is actually a continuum of people with more or less severe disabilities. For example, most users over the age of 45 have slightly reduced vision and require resizable fonts, even if they do not qualify under the official definition as "visually impaired". The needs of the elderly are different from those of younger users with disabilities, but there can sometimes be similarities between the two groups.

Unfortunately, although many countries are equipped with Web accessibility laws⁵ that adopt Web Content Accessibility Guidelines (WCAG), public sites are often inaccessible for those with disabilities because they are not compliant with the WCAG and even if content complies with the guidelines it may not be fully accessible to all users (Spina, 2019).

⁴ See <https://nces.ed.gov/surveys/all/>

⁵ A review of Web Accessibility laws in different countries can be consulted at www.w3.org/WAI/policies/

O'Neill explains in his article how the application of three design approaches, Universal Design, Universal Design for Learning, and Inclusive Design (which he collectively referred to as Abilities Design) to the design of websites can help allow all citizens to have access to information without barriers.

The methods and principles of these approaches are then applied to an analysis of the accessibility of two American government sites. Finally, the author highlights how the problem of inaccessibility is not only a technical problem but also and perhaps above all a cultural one.

3.2 Language

One of the greatest barriers to real access to legal and public information, as mentioned at the beginning, is the language complexity of the legal domain.

The law and its language affect the daily lives of virtually anyone in our society. Every time we take a ticket to park in a public garage or use public transportation we come in contact with legal language. Other experiences are less common but far more important like obtaining a credit card from a bank, consenting to a medical procedure, or buying and financing a house. In all these cases the language proposed is all too often incomprehensible or exceedingly difficult to those most interested in it. There is no doubt that legal language is peculiar and often hard to understand, especially from the perspective of lay people (Tiersma, 1999).

While bureaucratic language is tough for most citizens, it is even more difficult for some groups of people with temporary or permanent special communication needs such as people with intellectual disabilities, low literacy, or non-native language speakers such as migrants recently settled in a new country (IFLA, 2010).

In the efforts to improve the clarity of written government information the Plain Language⁶ approach has been developed in many countries for many years⁷. It is a written style centred on the user's goals that aims to make information easily scannable and understandable by avoiding long, complex sentences and jargon. There is no clearly defined target group; Plain Language writing scope is to be understandable for as large an audience as possible. (Vollenwyder et al, 2018).

But sometimes the situation needs more than just plain language. There are various special groups of people that may need a major simplification, through what is identified as Easy-to-Read language or Easy language (Piehl and Sommardahl, 2016).

Easy-to-Read language was specifically designed to meet the needs of people with cognitive and learning disabilities. But this approach of written communication also benefits a potentially larger audience, such as people with low language skills. Easy-to-Read Language tries to make text as simple as possible. Guidelines include for example the use of simple words, short sentences, and clear text structures, making only one statement per sentence⁸ (Vollenwyder et al, 2018).

In their paper for this special issue, Maaß and Rink explore how Easy Language translation can generate target texts in the field of legal communication that are accessible and action-enabling for non-expert users with communication impairments and, more generally, with different needs. This was investigated through the analysis of a corpus of legal text of different types and their Easy language translations within the framework of a project that involved the Research Center for Easy language and the Ministry of Lower Saxony in Germany.

6 As defined by the International Plain Language Federation "A communication is in plain language if its wording, structure, and design are so clear that the intended audience can easily find what they need, understand what they find, and use that information".

7 For a thorough explanation on the Plain language movement history see Adler (2012).

8 For more information on the Easy-to-read guidelines, see IFLA (2010), Guidelines for easy-to-read materials, Professional Reports 120, revision by Misako Nomura, Gyda Skat Nielsen and Bror Tronbacke and Inclusion Europe (2009), Information for all. European standards for making information easy to read and understand.

Luttermann's paper also deals with the topic of the translation of legal texts into Easy language, addressed to people with intellectual disabilities, low level of literacy or learners of a second language, like migrants or refugees. After introducing the concept of "Clear language" as preferable to "Easy language", the author presents the "Comprehensibility Model of Legal Language" that mostly takes in consideration the perspective of lay people and their knowledge. This model emphasizes the importance of considering that expert and lay communication is based on a mutual cooperation, where a lay person is also an active actor in the effort to understand the text through their own resources.

The negative implications of a public language that is too complex and inappropriate for some categories of people can't be seen only from a theoretical perspective but can be observed very concretely in the daily life of many.

This is very clearly stated in Kingsley and Mathai's contribution. The two authors present the case of the US Departments of Motor Vehicles' practices of revoking or suspending a driver's license for failure to pay traffic tickets. This happens after providing notices that are often too complicated for the intended audience to understand how to prevent or contest the suspension if they are unable to pay. The consequences of this could be serious in the US because a suspended license prevents people from getting to work, taking children to school, going to the doctor and accessing needed medical care. The main issue is that there is no government evaluation on if and how comprehensible their notices are to the average intended recipient who are often people with limited literacy levels, and who can't afford professional legal assistance. As showed by the authors this kind of evaluation could be simply performed by applying the Plain language principles that focus on the intended readers' needs and their literacy levels and looking for the best language style and information architecture to make the content easier to grasp.

3.3 Visual communication

Language is not the only tool to work on in order to make legal information content easier and clearer to lay people and especially to vulnerable audiences.

The same Plain language guidelines, in fact, do not rely only on words but include recommendations on the visual aspect of the text and on the use of graphics and images to support its understanding.

The use of visual aids and images is even much more important in the Easy-to-Read approach that is addressed to people with special needs. Here the use of visual communication is highly recommended as a means of describing what a text is about to people who can find it hard reading a complex text.

Visualisation studies show that the most efficient method for enhancing comprehension of complex language like legalese to non-experts is the use of "adjunct aids": visual organizers like structured text, headings, tables, bullet lists, charts, illustrations. These tools allow users to develop an easier understanding of the text that words alone cannot convey so well. (Berger-Walliser, 2016). This can help what is called the legibility of a text that relates to our ability to physically read the words on the page or screen. (Waller, 2011).

Visual support, as indicated by communication experts, helps understanding and learning. Reed underlines how our cognitive abilities to understand, remember, reason, solve problems and make decisions depend on a rich combination of words and images (Reed, 2010).

The use of visual elements played an important part in the project described by Cols's contribution. The aim of the activity illustrated was to redesign the Belgian letter of rights, which is the document informing detainees of their rights when they are arrested. Studies showed that the letters of rights provided to arrested people in EU countries are often unclear and ineffective in delivering information to the intended audience who often have low levels of literacy and are facing a stressful situation. The redesign process of the letter included many phases and involved different professionals and domain stakeholders as well as an overhaul on information structure and visual information.

Visual communication is also the focus of Pope and Treni's contribution. They deal with this topic within the theoretical framework of Community lawyering, whose core theme is “sharing knowledge” especially with marginalized communities so as to produce a social change in their relationship with the law. Co-design is the best method identified to achieve the goal of sharing information and experiences between law and communities and visual communication is a powerful tool to make that concrete. Visual narrative, in particular, is considered greatly compelling in this context because of its capability of involving people and persuading them to act. The narrative form is in fact believed to be the most suitable instrument for acquiring and understanding reality (Bruner,1986). These approaches and methods were applied by the authors in a project dealing with the designing of informational resources about Florida evictions and unemployment benefits during the COVID-19 pandemic.

Conti and Peruginelli too, in their paper, underline the importance of visual design techniques in communicating legal issues to non-experts. In their contribution the authors deal with the collaborative work carried out by the different teams of participants in the European projects. Legal issues involving the final beneficiaries of projects to be taken into consideration are increasing, especially in sensitive issues such as the protection of people's privacy. Visual communication could help make it easier for non-expert participants to understand legal content and overcome language and cultural barriers that may exist among researchers from different countries in this domain.

4. Accessibility and equity: putting people at the center

Communicating the law and public information to vulnerable audiences is strictly linked with the concept of accessibility and how to obtain it, a feature that has emerged from all the different contributions of this special JOAL issue.

Accessibility is a foundation principle to ensure public services meet the needs of individual, families, and communities and it is closely related to the principle of equality and inclusion. (OECD, 2019)

But, as underlined by Dana Chisnel in her keynote talk at Access for All Conference 2020⁹, to obtain accessibility for all you need more than equality, you need equity.

When we start thinking about access through the lens of equity, we now have a design principle that everyone can work toward: ensuring systemic outcomes that are not a result of or predicted by any aspect of a person’s identity.

Equality means proving everyone the same rights, the same status, the same opportunities. Equity, instead, recognizes that each person has different circumstances and allocates the exact resources and opportunities needed to reach an equal outcome (George Washington University, 2020).

Therefore, access through equity by design means making a design that everyone can access in every context of use, assuring that everyone can reach their own goals in the fewest, simplest steps. In legal information design it means that information should be findable (Is it available in the channel and format users have access to?), understandable (Is the language clear, plain and simple enough?) and actionable (Do users know what to do next?) for every kind of user (Chisnel, 2020).

The first step toward ensuring this kind of accessibility is understanding the barriers for vulnerable categories from a people-centric perspective. This approach was extremely clear from all the different contributions: no matter which strategy was most focused on (web accessibility, language or visual communication) all the authors were aware of the importance of understanding the intended audience's needs and involving them in the design or at least in the evaluation phase. In other words, it is necessary to design the contents according

⁹ Dana Chisnell, partner-Founder at Project Redesign and Senior Fellow at National Conference on Citizenship gave the speech titled “Access through equity by design” at the “Access for All Conference 2020” 13-15 October 2020. For further information on the conference see <https://www.accessforallconference.com/>

to the Human-centered design approach (Norman and Spencer, 2019). Specifically, the application of Human-centered design to the world of law is called Legal design. This emerging interdisciplinary approach, that also prioritizes the use of design techniques and visual disciplines, is focused on the point of view of the users of the law¹⁰

Making legal information accessible to anyone means following equality and inclusion as guiding principles and this requires legal and justice service providers to take into account their users' requirements and primarily the specific needs and experiences of vulnerable and marginalised groups (OECD, 2019).

The authors of this special issue have contributed valuably in this regard, sharing experiences and insights into how to communicate the law to the extreme users¹¹ in this domain, the people who face more obstacles in having their right to access information recognized. In addition, designing for extremes can improve the information accessibility for everybody, obtaining stronger outcomes, that serve a wider public and not just the extreme users (Hagan, 2017).

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¹⁰ See The Legal Design Alliance website at www.legaldesignalliance.org

¹¹ According to Hagan, extreme users are users "with an extreme problem, an extreme obsession with a thing, an extreme impairment, or is otherwise at the far end of a spectrum". See www.lawbydesign.com

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