

## Cracking the code of change in EU legal discourse: signifying practices shaping inclusion for the vulnerable in the digital age

FABIOLA NOTARI

Department of Studies on Language and Culture University of  
Modena and Reggio Emilia, Italy

[fabiola.notari@unimore.it](mailto:fabiola.notari@unimore.it)

ORCID: <https://orcid.org/0000-0003-4907-3641>

**Abstract:** The initiative of the Clear Writing Movement (Kimble 1992), targeting the democratization of communication by simplifying legal documents, has influenced the presentation of law globally. By uniting diverse philosophies of Plain Language and Easy-to-Read under the broad umbrella of text clarity and accessibility (Maaß 2020), this movement has particularly influenced the European Union's linguistic policy (Foley 2002; Nerelius 2014; Seracini 2019). Notwithstanding this progress and the accelerated shift towards digital transformation during the COVID-19 pandemic, the European Union's efforts to enhance its communication for vulnerable groups (European Union 2013) remain under-examined. This research, leveraging corpus linguistics and multimodal analysis, aims to systematically uncover foundational values and thematic clusters embedded in EU legal and policy documents related to the social inclusion and rights of vulnerable populations. It explores how these features are dynamically communicated through *Easy-to-Understand* multimedia resources produced



by Inclusion Europe and the European Commission (Bernabé and Orero 2020). Findings underscore the pivotal role of digital technology in revolutionizing the creation and interpretation of legal documents, reflecting the European Union's proactive efforts to forge new avenues for multimodal legal communication marked by innovative signifying practices. The research concludes by highlighting the socio-semiotic and context-specific dimensions of legal discourse. Far from being merely universal and abstract, it can be adapted and reshaped to reflect societal and political stances on regulated issues. This approach can foster a sense of belonging, empowerment, and inclusivity within vulnerable communities, while also nurturing broader societal cooperation and understanding.

**Keywords:** European Union (EU); Easy-to-Read Language (E2R); Vulnerable Populations; Legal Discourse; Digital Transformation; Corpus Linguistics; Multimodal Analysis, Thematic Cluster Analysis.

### **Decifrare il cambiamento nel linguaggio giuridico dell'ue: pratiche significative per un'inclusione digitale delle persone vulnerabili**

**Sinopsi:** Il Movimento globale per la Scrittura Chiara (Kimble 1992), incentrato sulla democratizzazione della comunicazione attraverso la semplificazione dei testi giuridici, ha significativamente influenzato la politica linguistica dell'Unione Europea (Foley 2002; Nerelius 2014; Seracini 2019). Attraverso l'utilizzo di metodi di linguistica dei corpora e di analisi multimodale, questo studio propone un nuovo approccio metodologico misto per esplorare cluster tematici e svelare come i documenti giuridici dell'UE, rivolti alle popolazioni vulnerabili (Unione Europea 2013), vengano tradotti in materiali facilmente accessibili e comprensibili mediante l'adozione del Linguaggio Semplice (Maaß 2020). La ricerca mette in luce il ruolo cruciale della tecnologia digitale e gli sforzi proattivi dell'UE nell'innovare la comunicazione legale visuale, evidenziando una nicchia specifica non ancora pienamente esplorata: l'analisi della comunicazione multimodale del discorso giuridico. Tale esplorazione offre nuove prospettive sulle dinamiche socio-semiotiche e sul contesto specifico della comunicazione istituzionale, proponendo nuove vie per rafforzare l'inclusione e promuovere una cooperazione sociale più ampia. Emergono l'importanza di adattare e plasmare l'articolazione del diritto per rispondere efficacemente alle esigenze delle comunità vulnerabili e la necessità di un continuo impegno nella ricerca per sviluppare strategie comunicative che siano al contempo inclusive, precise e capaci di preservare l'integrità del linguaggio legale, nel rispetto dei valori fondamentali dell'Unione Europea.

**Parole chiave:** Unione Europea (UE); Linguaggio Facile da Leggere; Popolazioni Vulnerabili; Discorso Legale; Trasformazione Digitale; Linguistica dei Corpora; Analisi Multimodale; Analisi dei Cluster Tematici.

## 1. Introduction

### 1.1 Background

In an age where specialization is the norm, we constantly interact with experts who communicate in jargon-rich languages. This creates a landscape where many texts become functionally inaccessible, failing to address users in a manner that allows for clear understanding or application of the information presented. The challenge spans across society, encompassing anyone whose communicative needs are unmet in specific contexts (Ma 2022). Among the most affected are vulnerable groups (European Union 2013), including individuals with disabilities (United Nations 2006), the elderly (European Commission 2017, Principle 15), and children (European Union 2011). This also extends to individuals with limited literacy skills, non-native language speakers, and those experiencing socio-economic disadvantages (European Commission 2017, Principle 3).

Acceptability pertains to presenting content in a manner that is engaging and respectful to all users (Maaß 2020). This involves considering the diverse sensory abilities of the audience by utilizing clear fonts, suitable sizes, and vivid contrasting colors. Additionally, in multimodal contexts, it ensures that auditory information is accessible through means such as subtitles, sign language interpretations, or visual alerts for important audio cues (Bernabé 2020). Beyond sensory considerations, it is crucial to ensure that content is intellectually approachable (Harding 2023) and effortlessly retrievable. Achieving visibility in search engines (SEO) is critical, alongside creating well-organized, user-friendly websites with intuitive navigation tools and layouts (Buehler et al. 2016; Raymaker et al. 2019).

Together, these elements enhance access to information and promote inclusivity and democracy in communication. Ensuring that information is perceptible, comprehensible, and retrievable across diverse cultural and social contexts fosters universal engagement and participation through digital means. The COVID-19 pandemic has further highlighted this necessity, emphasizing the importance of accessible communication across all circumstances.

## **1.2 Statement of the problem**

Historically, the legal profession has epitomized linguistic seclusion more than any other specialized field, with ‘legalese’ being notoriously dense, verbose, and abstract (Mellinkoff 1963; Tiersma 1999). As both a renowned scholar and practitioner, Webster highlighted as early as 1849 the importance of “the power of a clear statement” in effective legal writing (cited in Gerhart 1969: 18).

Yet, despite these ideals, the preference for legal jargon has proven hard to shake off and persists even today (Giampieri 2024; Maksimova and Matsyupa 2022). This tendency, possibly influenced by a desire to impress, a commitment to tradition, or simply a lack of awareness of more transparent alternatives, not only detracts from the content’s meaningfulness but also creates a false impression of precision. Consequently, it can obscure logical fallacies and further complicate effective communication.

Following the mantra “When legalese threatens to strangle your thought processes, pretend you’re saying it to a friend. Then write it down. Then clean it up” (Hurd 1982: 34), the Clear Writing movement has garnered attention in many countries over the last half-century (Kimble 1992). Initially grounded in the concept of Plain Language, this approach has resulted in the development of various guidelines and action plans in both Anglophone and non-Anglophone countries, covering private and public legal domains. It advocates for clear, concise writing with an emphasis on accessible layout and logical organization, thereby enhancing readability and comprehension for both lay audiences and professionals (Williams 2004).

Complementarily, the more recent Easy-to-Read (E2R) and Easy-to-Understand (E2U) initiative (see Bernabé 2020) has further

underscored the need to make texts explicitly accessible to everyone, with a particular focus on vulnerable populations (Arias-Badia and Matamala 2020; Chinn and Buell 2021). It builds on the principles of Plain Language but pushes the boundaries by emphasizing extreme language simplification (Miesenberger and Petz 2014). Specifically, it prioritizes the use of short sentences and the integration of visual aids to enhance intuitive understanding. The primary goal is to make legal information comprehensible to the widest possible audience, particularly individuals with intellectual disabilities or reading challenges (Hansen-Schirra and Maaß 2020; Matamala 2021).

From a research perspective, the interplay of verbal, non-verbal, written, and electronic communication in the legal field offers valuable insights into how societal attitudes, values, and policies converge to shape diverse groups (Mirić 2022). This analysis sheds light on the mechanisms through which society confronts stereotypes and prejudices, advancing objectives such as gender equality, sustainable economic development, and fair employment practices.

Within this spectrum, Easy-to-Read (E2R) language occupies a distinctive place in the continuum of legal communication. It not only empowers vulnerable communities but also enhances their recognition, potential, and contributions. The recent global emphasis on building peaceful, just, and inclusive societies (United Nations 2015, Goal 16) has altered the way we perceive vulnerable communities and individuals with disabilities. Once seen merely as recipients of care, they are now recognized as active rights-holders with capacities for self-determination and societal participation.

The European Union, dedicated to fostering cohesion and equality, leads initiatives to promote inclusive and accessible legal communication through various efforts (European Union 2016; 2020; FRA 2022; JRC 2023). Among these, Inclusion Europe (2009; 2014; 2022; 2024) plays a key role by actively engaging vulnerable groups, particularly individuals with disabilities, in the development and evaluation of inclusive communication materials. This participation not only shapes these resources but also compensates contributors for their insights (Giaconi et al. 2021).

Despite these advancements, a notable gap persists in literature on integrating EU guidelines into digital formats for vulnerable populations. Research focuses on linguistic and translational adaptations within member states (Carrer 2021; Perego and Rocco 2022). This underscores the need to explore how the EU

establishes a cohesive strategy transcending national boundaries to effectively communicate its *acquis Communautaire*, addressing diverse communicative needs.

Delving into this area could yield significant insights, especially as current research on visual design in legal communication mainly focuses on innovations in private law in comic contracts (Andersen 2018; Brunschwig 2019; Haapio, Plewe, and deRooy 2016; Pitkäsalo and Kalliomaa-Puha 2019; Williams 2022). In contrast, multimodality in public law may reveal key variations in iconography, pragmatics, and semiotics crucial for citizen participation.

### **1.3 Study objectives**

Building on the challenges and developments outlined, this study aims to explore how the European Union is addressing the need for accessible legal communication through its legislative actions and digital innovations. The focus is on understanding the adaptation of fundamental norms, principles, and values within EU legal and policy documents on social inclusion and accessibility. This includes examining how these documents are dynamically adapted and pitched to the level of topical and legal sophistication (Xanthaki 2019; 2022) appropriate for their intended audience. The specific objectives of the research are defined through the following key questions, which guide the entire analysis:

- RQ1:** *How are themes of inclusion and the rights of vulnerable communities constructed and articulated within the EU's binding legal documents?*
- RQ2:** *How does the EU translate these themes into Easy-to-Understand resources to assist vulnerable groups in understanding their rights?*
- RQ3:** *What effects do digitalization and simplification strategies have on the clarity and precision of EU legal discourse?*

The rest of the paper is structured as follows: Section 2 outlines the research design, including corpus construction and the methodological approach. Section 3 presents the findings, while

Section 4 discusses their implications. Finally, Section 5 concludes the study with suggestions for future research avenues.

## **2. Research design**

### **2.1 Materials**

This study constructs two distinct corpora: the EU Inclusion Legal Framework Corpus (ILFC) and the EU Accessibility Easy Language Corpus (AELC). The creation of these corpora follows rigorous methodologies to ensure comprehensive and representative datasets for the analysis.

The first corpus, ILFC, comprises 164,985 tokens and serves as the primary dataset for this study. It includes foundational EU charters, legislation, and ratified international laws from 1983 to 2023 on inclusion and accessibility rights. The selection criteria were rigorously defined to capture texts that are “legally binding” and “primarily prescriptive” (Šarčević 1997: 11).

The second corpus, AELC, comprises a comparable amount of multimedia and digital resources developed by Inclusion Europe to enhance the accessibility of legal communication for vulnerable groups. These resources, characterized by a “purely descriptive” function (Šarčević 1997: 11), were selected based on their relevance to the legislative matters addressed by the ILF Corpus and their incorporation of diverse multimodal formats, including Easy-to-Read and Easy-to-Understand multimedia webpages and videos.

### **2.2 Methodology: rationale**

This study employs a novel approach that diverges from traditional methodologies used in visual law and legal design analysis. Previous research has largely concentrated on comic contracts within the

private law context, utilizing qualitative methods. These methods range from monadic descriptive analysis (Andersen and Corner 2022; Botes 2017; Keating and Andersen 2020; Ketola, Pitkäsalo, and de Rooy 2023; Murray 2021c; 2021b) to direct, contrastive comparisons between original legal texts and their visual or simplified counterparts (Canepari 2019; 2023; Doczekalska and Biel 2022; Ketola 2021; Loddo 2022; 2023; Pitkäsalo 2020). While the contrastive approach offers valuable insights into intersemiotic translation mechanisms, this study critically evaluates its broad application to public law. Unlike private law texts, public law documents may not exhibit a direct one-to-one correspondence between the original source texts (STs) and their simplified multimodal (E2R and E2U) target texts<sup>1</sup> (TTs).

Expanding on this understanding, the objective of this research is not to establish a direct correlation between the original legal materials and their non-binding simplified versions in terms of “legal equivalence” (Šarčević 1997:48). Instead, the underlying focus is to delineate “semantic equivalence” (Newmark 2003:46) by thoroughly investigating how core values and themes from the EU’s fundamental acquis on inclusion are communicated through Easy-to-Read and Easy-to-Understand resources. Accordingly, a mixed-method approach is employed, integrating quantitative corpus-driven linguistic research with qualitative multimodal analysis to provide a comprehensive understanding of the data. Thematic clusters are subsequently derived to serve as a *tertium comparationis*, facilitating a deeper exploration of how semantic elements are constructed across original and simplified legal texts. Ultimately, this comparative framework fosters a more thorough and systematic engagement with legal concepts and values.

---

<sup>1</sup> In private law, precise intersemiotic translation is crucial for full understanding at contract signing, as contracts are deemed legally binding (Ketola et al. 2024:1). In contrast, the EU’s Easification goals (Inclusion Europe 2009), unlike the Plain Language strategy, do not require exact legal correspondence (European Commission 2024). These public law documents often rely on intertextuality (Notari 2019), necessitating that simplified materials synthesize information from various sources into a coherent narrative, providing a faithful yet integrative and selective representation of the original texts.



## **2.3 Corpus analysis and thematic cluster validation: ILF Corpus**

The first phase of the mixed-methods approach involved a corpus-driven analysis of the EU Inclusion Legal Framework Corpus (ILFC) to identify thematic clusters and value-laden linguistic cues within the EU's "legally binding" discourse on vulnerability (Šarčević 1997: 11). This phase consisted of three key stages: material preparation, analysis, validation, and visualization of results.

In the material preparation stage, official EU documents were converted into text files using ABBYY FineReader (2021). Subsequently, Part-of-Speech (POS) tagging was performed with TagAnt software (Anthony 2022). During the analysis stage, AntConc (Anthony 2019) was used for frequency analysis to identify keywords and facilitate manual theme identification.

Notably, five provisional themes were identified, including 'Human Rights and Non-Discrimination', 'Inclusion and Accessibility for People with Disabilities', 'Social Protection and Security', 'Legislative and Institutional Framework', and 'Specific Rights' for diverse groups like the Elderly, Women, Children, and the Disabled.

To refine the thematic analysis and deepen insights into the values conveyed in legal texts, the top twenty most frequent adjectives in the ILFC were examined. Generic adjectives such as 'other', 'such', 'particular', and 'present' were excluded due to their broad application and limited research relevance.

Subsequently, the analysis focused on the remaining fifteen terminological adjectives, selected for their potential to highlight value-laden aspects of legal language. This process involved detailed collocate analysis, Keywords in Context (KWIC), and n-gram analysis to explore their semantic relationships and evaluative roles. Despite criticisms regarding clarity (Tiersma 1999), these terminological adjectives can convey a range of nuanced meanings, including "referential, symbolical, indicative, factual, positive, informative, intellectual, representative" (Gény, as cited in Wagner 2003: 54).

In the validation and visualization phase, Orange Data Mining Software (University of Ljubljana 2016) was used to create word clouds, which facilitated thematic cluster validation. The capabilities of the software allowed for interactive data exploration beyond static statistical analysis, while intuitive visualization techniques aided in

the identification of latent relationships and patterns in the data that may not be immediately apparent through numerical or tabular output.

A critical threshold of 0.005% established a cut-off at 8, facilitating the consolidation of the initial five themes into three major thematic clusters and identifying significant adjectives within them. This Python-based method, complemented by manual refinement techniques, was pivotal in confirming that certain elements previously considered in the analysis (“anti-clusters”) were not essential to the research objectives.

Overall, this inductive, corpus-driven approach allowed for the natural emergence of thematic clusters directly from the data, effectively bypassing the constraints of predefined thematic categories based on the researcher’s intuition or legal knowledge. However, it is important to acknowledge that while this approach is rooted in systematic methodologies, the incorporation of manual interpretations and detailed discourse analysis—particularly through adjective examination—introduces a degree of subjectivity that is essential in legal studies, a field deeply intertwined with humanistic interpretation.

## **2.4 Multimodal analysis: AEL Corpus**

The second phase of the mixed-methods approach involved a qualitative multimodal analysis of the Accessibility Easy Language Corpus (AELC). This phase aimed to examine how the themes and values identified in the EU Inclusion Legal Framework Corpus (ILFC) are conveyed to the public through Easy-to-Understand resources with a “purely descriptive” function (Šarčević 1997: 11).

During the pre-processing phase, documents were converted to PDFs, and the audio from videos was transcribed. The multimodal analysis was inspired by Murray’s “Methodology for Analysis of Visuals in Legal Works” (2021a), originally developed for comic contracts. Given the digital and multimodal nature of the AEL Corpus, this framework was adapted to include two new dimensions: ‘Analysis of Auditory Elements’ and ‘Digital Interactivity and Accessibility’. Furthermore, the dimension “Visual Rhetoric and Ethical and Professional Propriety of the Work” was redefined as ‘Ethical and Inclusive Representation’ to better address the specific sensitivity needs of vulnerable groups. This revised approach, detailed in Table

1, establishes a new standard for analyzing digital multimodal legal content for vulnerable communities.

Step	Description	Analytical Criteria
A. Immediate Visual Context	Examines how visual elements like icons and symbols convey themes and concepts.	Icons, symbols, characters, diagrams.
B. Immediate Verbal Context	Analyzes how text supports and clarifies visual elements.	Legalese vs. plain language.
C. Visual Cultural Context	Assesses how cultural factors affect the interpretation and representation of visuals.	Cultural symbols, diversity.
D. Mise en Scène and Rhetorical Arrangement	Evaluates how information is organized and presented to support messages about rights and inclusion.	Structured vs. unstructured layout.
E. Ethical and Inclusive Representation	Reviews the ethical and inclusive quality of visual and textual content.	Ethical, inclusive, non-stereotypical representation.
F. Analysis of Auditory Elements	Examines how audio elements enhance the multimedia content.	Spoken language, music, sound effects.
G. Digital Interactivity and Accessibility	Analyzes digital features that improve interaction and accessibility.	Hyperlinks, format variety, feedback mechanisms.

Table 1. Framework for Analyzing Digital Multimodal Legal Works.

### 3. Results

This section presents findings across three thematic clusters: (i) Rights and Social Inclusion Cluster; (ii) Legal Framework and Institutional Aspects; and (iii) Public Services and Wider Accessibility. Each cluster is analyzed by first presenting the results from the corpus analysis and thematic visualization of the ILF Corpus, followed by a case study approach to illustrate representative examples from the multimodal analysis of the AEL Corpus. This approach ensures a coherent exploration of how key legally binding themes are translated into accessible Easy-to-Read and Easy-to-Understand resources.

3.1 Rights and Social Inclusion Cluster

The ‘Rights and Social Inclusion’ cluster collects the European Union’s discourse on rights and social inclusion in the ILFC, with a particular emphasis on terminological adjectives ‘social’, ‘equal’, and ‘full’ (Table 2). These adjectives, along with their most frequent collocates, strategically outline the European Union’s thematic priorities. At the same time, they subtly reflect the Union’s core values of inclusivity, equality, and comprehensive participation in regulated matters.

Adjective (#Rank) (Frequency)	Notable N-Grams
Social (# 2) (#426)	Social protection and social security; social and cultural rights; social and economic development; social and cultural life.
Equal (#7) (#220)	Equal basis with others; equal access to health; equal terms with men; equal remuneration for work.
Full (#14) (#146)	Full participation and equality; full and effective participation; full and equal enjoyment; full integration into society.

Table 2. Key Adjectives in the ILFC within the Rights and Social Inclusion Cluster.

The adjective ‘social’ is prominently featured and often appears alongside verbs that underscore the EU’s commitment to actionable policies and community engagement. When collocating with ‘promote’, the adjective ‘social’ prioritizes the EU’s proactive endeavors to cultivate communal integration (“...*promoting **social** progress and better standards of life in larger freedom...*”) and cohesion (“...*fostering actions of solidarity between generations and thus promoting **social** cohesion...*”).

Such linguistic choices underscore a sense of advocacy for progress and ambition to elevate awareness on issues of inclusion. They convey an expectation for diverse entities—including governmental bodies and individuals—to partake in nurturing

valuable transformations (“...*To promote positive perceptions and greater **social** awareness towards persons with disabilities...*”).

Moreover, the coupling of ‘social’ with development and assurance verbs like ‘develop’ and ‘ensure’ reveals a multifaceted approach to social welfare. ‘Develop’ suggests a forward-looking ambition to enhance social and economic infrastructures, indicating a process of continual improvement (“...*to further develop **social** action multiplies the impact...*”).

Conversely, ‘ensure’ implies a duty to uphold essential living conditions, carrying an obligation to maintain standards where progress and protection are mutually reinforcing (“...*ensure gender equality in **social** protection...*”).

Suggesting implicit value judgments about the desired state of society, the strategic pairing of ‘social’ with ‘inclusion’ articulates an EU policy goal. This goal is dedicated to guaranteeing that all citizens, especially those from marginalized backgrounds, have not only the physical and legal capacity to participate but also live in a society where diversity is both acknowledged and valued (“...*achieving the fullest possible **social** inclusion highlights the EU’s goal of creating an environment where everyone can participate fully in society...*”).

In its varied nuances, ‘social’ in combination with ‘integration’ suggests a more reciprocal and mutual communal adaptation. It highlights the EU’s vision beyond initial access to inclusion, ensuring that disadvantaged groups become active and integral members of the community across all its facets. This represents a dynamic, holistic, and reciprocal adaptation process between individuals and society, requiring shifts in both policy and cultural paradigms to embrace a complex societal change (“...*the integration of older migrants into the **social**, cultural, political, and economic life of destination countries and encouraging respect for those migrants...*”).

Against this backdrop of inclusivity and community engagement, ‘equal’ enriches the narrative established by ‘social’, adding a dimension of justice and parity to the discourse. This spans from conditions of employment (“...*Recommendations on quality of employment and fair and **equal** wages...*”) to the universal entitlement to rights (“...*all human beings are born free and **equal** in dignity and rights...*”). Furthermore, it extends to the very mechanisms of decision-making and participation (“...*equal right of all persons with disabilities to live in the community, with choices **equal to** others...*”).

In EU discourse, the adjective ‘full’ amplifies themes of rights and social inclusion. It further enriches initiatives and principles already underscored by the adjectives ‘social’ and ‘equal’, lending greater depth and a sense of completeness to the Union’s actions and policies (“...to enable the **full** and equal participation of older persons...”). This adjective emphasizes the aim of complete and unrestricted participation but also indicates a commitment to the gradual and sustainable realization of rights (“...progressively the **full** realization of the right...”).

Unlike in private law, where ‘full’ often refers to quantifiable obligations or benefits (e.g., ‘full payment’), in EU public law, ‘full’ takes on a broader meaning. It suggests a deeper realization of policies and rights aligned with principles of equality and non-discrimination (“...ensuring the **full** enjoyment of economic, social, and cultural rights...”). In this context, ‘full’ becomes a powerful indicator of the EU’s ambition and scope of policies, not only in terms of aspirations but also expectations (“...a spouse and to enter into marriage only with their free and **full** consent...”; “...disabled child should enjoy a **full** and decent life...”).



















The word cloud (Figure 1) visually underscores the core nodes of the Rights and Social Inclusion Cluster. Highlighted terms such as ‘Community’, ‘Principles’, and ‘Persons’ illuminate the significance of fostering societal cohesion, upholding shared ethical standards, and valuing individual dignity. It emphasizes ‘Inclusion’, ‘Integration’, ‘Equality’ and ‘Participation’ as central tenets in the pursuit of an integrated and equitable society. Moreover, terms like ‘Protection’, ‘Security’, and ‘Benefits’ underscore a commitment to social welfare, where ‘Children’, ‘Women’, ‘Ageing’, and ‘Disabilities’ represent the groups at the core of the EU’s policies for inclusion for all, regardless of age, gender, or abilities. ‘Need’, ‘Poverty’, ‘Discrimination’, and ‘Exclusion’ highlight the obstacles to inclusion and equality.



Figure 1. Word Cloud from the Rights and Social Inclusion Cluster.

The multimodal analysis (Table 3) reveals how the European Union condenses its commitment to diversity, equality, and inclusion into Easy-to-Understand webpages (Figure 2). These values of the ‘Rights and Social Inclusion’ cluster are visually represented through diverse ethnicities, ages, and genders, with a deliberate avoidance of explicit cultural symbols to resonate ethically across the EU’s diverse audiences. These depictions of vulnerable communities emphasize full inclusion and active participation in everyday scenarios such as workplaces, educational settings, and healthcare facilities. Positive visual cues, such as thumbs-up gestures, joyful expressions, and handshakes, effectively convey the EU’s active commitment to promoting integration. They also emphasize community cohesion through collaboration and support. Scenes of isolation, discomfort, and marginalization are reimagined as representations of active societal participation, where everyone is valued and supported.

Figure 2. Case Study 1: What are the 20 Principles of the European Pillar of Social Rights?

 <p>The European Pillar has 20 parts, called 'principles'.</p>  <p><b>1. Education, training and life-long learning</b> Everyone has the right to good education and training throughout their life.</p>  <p><b>2. Equal treatment between women and men</b> Women and men must be treated in the same fair way in all aspects of their life.</p>  <p>That includes being treated in the same fair way:</p> <ul style="list-style-type: none"> <li>when you are looking for work;</li> </ul>  <ul style="list-style-type: none"> <li>when you are in work;</li> </ul>	 <ul style="list-style-type: none"> <li>when getting paid for the work you do.</li> </ul>  <p><b>3. Equal opportunities</b> Equal opportunities means that everyone has the same fair chance to take part in the world around them.</p>  <p><b>4. Help to get a job</b> Everyone has the right to be supported to get work or set up their own business.</p>  <p><b>5. Work that is flexible and lasts for a long time</b> All workers have the right to:</p> <ul style="list-style-type: none"> <li>fair and equal treatment at work;</li> <li>get support and training;</li> <li>feel safe and secure in their job.</li> </ul> 
 <p><b>6. Pay</b> All workers have the right to fair pay, for a decent standard of living.</p>  <p><b>7. Clear information about your job</b> All workers have the right to clear information about their work. Workers also have the right to clear information about the reasons why they lost their job.</p>  <p><b>8. Listening to workers</b> All workers have the right to speak up about decisions that affect them at work.</p>  <p><b>9. Work-life and home-life</b> All workers who are parents or carers have the right to take time off work to help the people they look after.</p>	 <p><b>10. Health and safety</b> All workers have the right to be protected at work.</p>  <p>Workplaces should be safe and healthy for everyone. Personal information must stay private.</p>  <p><b>11. Childcare and support to children</b> All children have the right to get good care and education.</p>  <p>All children have the right to protection from poverty.</p>  <p><b>12. Protection from being very poor</b> Everyone has the right to the basic things they need to live.</p>
 <p><b>13. Unemployment benefits</b> Everyone without a job has a right to unemployment benefits. This is money to help you afford the basic things you need to live.</p>  <p><b>14. People who don't have enough money</b> People who cannot afford basic services have the right to extra help from the government.</p>  <p><b>15. Old-age pensions</b> Women and men have equal rights to a pension. A pension is money for you to live on when you retire.</p>  <p><b>16. Healthcare</b> Everyone has the right to affordable, good-quality healthcare.</p>	 <p><b>17. People with disabilities</b> People with disabilities have the right to support to:</p> <ul style="list-style-type: none"> <li>live with dignity;</li> <li>take part in the world around them.</li> </ul>  <p><b>18. Long-term care</b> Everyone has the right to affordable long-term care. That is care for people who have a health condition or serious disability.</p>  <p><b>19. Housing</b> Everyone has the right to a good-quality, affordable place to live.</p>  <p><b>20. Basic services</b> Everyone has the right to basic services. Basic services include getting access to things like water, electricity, banking and internet.</p>



Step	Description
	<p><b>A. Immediate Visual Context:</b> Infographics vividly represent the EU’s holistic approach to integration rights across domains including work, education, and healthcare. The use of engaging visuals, stylized characters, and universal symbols contributes to the illustration of the EU’s envisioned principles of societal engagement. Depictions, such as a caregiver aiding an elderly person, effectively link abstract notions and principles of social support and protection to tangible situations. These visuals depict complete participation, a sense of security, and equity within a fair community setting.</p>
	<p><b>B. Immediate Verbal Context:</b> The use of straightforward and understandable language avoids complex jargon. Phrases such as “have the right”, “getting paid”, and “feel safe” render rights more approachable, fostering understanding and engagement. Descriptive adjectives (“fair”, “clear”), evaluative (“affordable”, “good-quality”, “good”), relational (“equal”, “basic”), and temporal (“long-term”) subtly incorporate principles and ethical standards. Although not all are strictly legal terminological adjectives, they reflect the policies’ objectives and values in accessibility, sustainability, equality, and justice.</p>
	<p><b>C. Visual Cultural Context:</b> The use of universal icons (e.g., a house for housing and a medical cross for healthcare), along with contemporary symbols (e.g., WiFi for basic services) promotes mutual recognition and understanding among the EU’s varied population, reflecting inclusion principles.</p>
	<p><b>D. Mise en Scène and Rhetorical Topic Arrangement:</b> A structured top-down presentation is used to navigate the EU’s social rights. A clear vertical layout sequentially introduces each principle, creating a dynamic sense of social integration across all life stages and among various vulnerable groups. Topic arrangement suggests adaptability in policy and strategy to ensure that disadvantaged groups become active and integral members of the community.</p>
	<p><b>E. Ethical and Inclusive Representation:</b> The emphasis on comprehensive participation is visually represented through a broad and balanced spectrum of gender, race, and age. It avoids stereotypes to promote a culture of inclusive communication. Depictions range from work to family life, underscoring the universality of social rights and highlighting the EU’s commitment to diversity and ethical portrayal.</p>
	<p><b>F. Analysis of Auditory Elements:</b> Not applicable in this context.</p>

<b>G. Digital Interactivity and Accessibility:</b> Webpage hyperlinks, social network sharing, and feedback mechanisms enhance engagement. Information is accessible, navigable, and shareable, with FAQs for support.
--

Table 3. Multimodal Analysis of Case Study 1.

### 3.2 Legal Framework and Institutional Aspects

The ‘Legal Framework and Institutional Aspects’ Cluster encompasses the EU’s discourse on developing policies and strategies that transform principles of inclusion into actionable and enforceable laws. The frequently used adjectives ‘legal’, ‘national’, and ‘international’ in the ILFC serve as value-laden indicators, illustrating the scope and scale at which the EU aims to operationalize its commitment to inclusion (Table 4).

<b>Adjective (#Rank) (Frequency)</b>	<b>Notable N-Grams</b>
Legal (# 15) (131)	Legal barrier to; legal and political inclusion; legal and administrative measure.
National (#6) (271)	National law and practice, national effort to; national and international level; national and local.
International (#9) (178)	International human right; international cooperation in; international assistance to; international obligation to ensure.

Table 4. Key Adjectives in the ILFC within the Legal Framework and Institutional Aspects Cluster.

In EU public law discourse, the term ‘legal’ attains a significant depth, surpassing the conventional and basic understanding of compliance with laws and regulations typical of various legal branches. It evolves into a dynamic concept capable of shaping implicit meanings of judicial frameworks, intertwining them with profound ethical connotations. ‘Legal guardian’ epitomizes this integration, highlighting the EU’s holistic approach to social welfare and legal duties. This concept reflects a dual commitment to legal obligations and moral imperatives, aiming to enhance the social,

economic, and cultural well-being of vulnerable individuals (“...**legal** guardians have the primary responsibility for the upbringing and development of the child...”).

Similarly, ‘legal capacity’ frequently collocates with active, experiential verbs such as ‘enjoy’ and ‘exercise’. It stresses the EU’s focus on enabling every individual, except in extreme cases, to fully exercise their rights without impediments. This stance showcases a substantial commitment to civil liberties and human rights (“...provide persons with disabilities the support they may require in exercising their **legal** capacity...”). Concurrently, the use of the binomial ‘null and void’ firmly underscores the EU’s zero-tolerance policy towards discrimination. It specifically addresses and invalidates any unjustified restriction in recognizing and assigning legal capacity (“...restricting the **legal** capacity of women shall be deemed null and void...”).


The evolution of the concept of ‘legal’ from strict adherence to law to a broader societal role imbued with values to achieve the EU’s goals becomes even clearer when examining its association with ‘barriers’. This reveals that some legal norms, even when officially sanctioned, are not necessarily aligned with the principles of justice and inclusivity the EU aspires to uphold. The transitive verbs ‘remove’ and ‘eliminate’ indicate the EU’s intent to critically assess and reform legal frameworks within member states for ethical and integrated European governance (“...Older persons can experience financial, physical, psychological, and **legal** barriers to health-care services...”).

This proactive aspect is further evidenced by the collocations of ‘legal’ with legislative terms such as ‘act’, ‘draft’, and ‘citizen-proposed’, highlighting the importance of citizen engagement in the legislative process. Through empowerment and participatory democracy, passive constructions such as ‘granted the right’ illustrate the EU’s role in bestowing privileges upon its citizens (“...citizens are granted the right to approach the Commission directly with a **legal** request...”). Such an approach blends top-down legislative directives with grassroots advocacy, further exemplified by the use of procedural verbs such as ‘submit’ (“...submit any proposal on matters where citizens consider that a **legal** act of the Union is required...”).

This value-laden dimension of ‘legal’ then extends beyond the EU’s supra-national dimension. ‘National’ often modifies abstract nouns within the legal and organizational context (‘law’, ‘framework’, ‘legislation’, ‘institution’), collective nouns related to official power



The multimodal analyses (Tables 5 and 6) illustrate how the EU uses icons, symbols, and visual narratives to convey the legal framework of ‘deinstitutionalization’. Unlike the broader focus of the previous case study, which featured more cartoon-like characters (Figure 2), these examples—presented through webpages (Figure 4) and videos (Figure 5)—specifically emphasize intuitive communication tailored for individuals with cognitive disabilities.




**The United Nations Convention (UN CRPD)**

The United Nations Convention on the Rights of Persons with Disabilities (**UN CRPD**) says that every person with disability has rights.

Rights to live **independently** and to be included in community.


Rights to have access to education, health, work and employment.

Rights to fully participate in **political** and public life.




If people with disabilities don't have legal capacity they cannot sign working contracts.

Only with legal capacity people can do things that are fine with the law of a country.




People without legal capacity are not free to use their own money.








This means that people with disabilities very often can't open a bank account. It also means that if they create an organisation, this organisation cannot get any money from the state. This is because they don't have legal capacity.

**Good examples**




Some countries are making the right to vote more easy for people living under guardianship and more people can now vote.


From the right to make decisions come also other rights, for example:

-  the right to vote and be elected
-  the right to choose where and who you live with
-  the right to make decisions regarding health
-  the right to marry and have a family
-  the right to have a bank account and manage your own money

**The right to vote and to stand for elections**




The right to vote is the right to elect people who represent us.



The right to stand for elections is also important.

If people with disabilities cannot vote or stand for elections they are not treated equal with the rest of the people. In some countries, people who are under guardianship can't serve in a jury at a court.

**Political participation**



People living in institutions or under guardianship are often excluded from studies and discussions about politics.

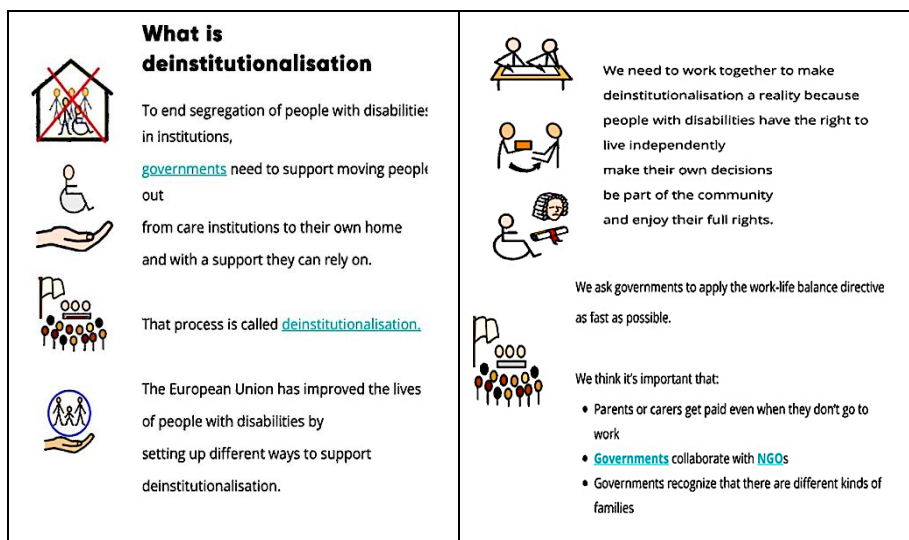


Figure 4. Case Study 2: Role of the European Union in Deinstitutionalisation and Independent Living.

Step	Description
A.	<b>Immediate Visual Context:</b> Visuals highlight UN CRPD principles within the EU’s policy. Using clear symbols (e.g., ballot boxes and medical crosses), these illustrations demonstrate how individuals with disabilities can actualize principles of equality and fairness through legal frameworks. ‘Legal capacity’ is depicted as a fundamental gateway. Legal feasibility is intertwined with ethical considerations, aligning with the EU’s aspirations. It is represented by an open hand supporting individuals with disabilities within a protective blue circle, reminiscent of the EU emblem. This fosters their autonomy in the context of deinstitutionalization, aligning the need for legal permissibility with ethical and humanitarian imperatives.
B.	<b>Immediate Verbal Context:</b> The language used is straightforward. Features highlighted in bold function as hyperlinks to an Easy-to-Read glossary. Rights are concisely listed in bullet points for ease of understanding, employing direct, jargon-free language. Adverbs such as “independently” and “fully” used in positive sentences, underscore the unimpeded exercise of rights. Meanwhile, value-laden adjectives like “equal” and “full”, when used with verbs in the negative form, vividly illustrate the concept of legal barriers.
C.	<b>Visual Cultural Context:</b> The infographic uses universal symbols—such as prohibition signs, icons, and the UN logo—to communicate inclusivity and rights in a culturally transcendent and easily understandable manner.



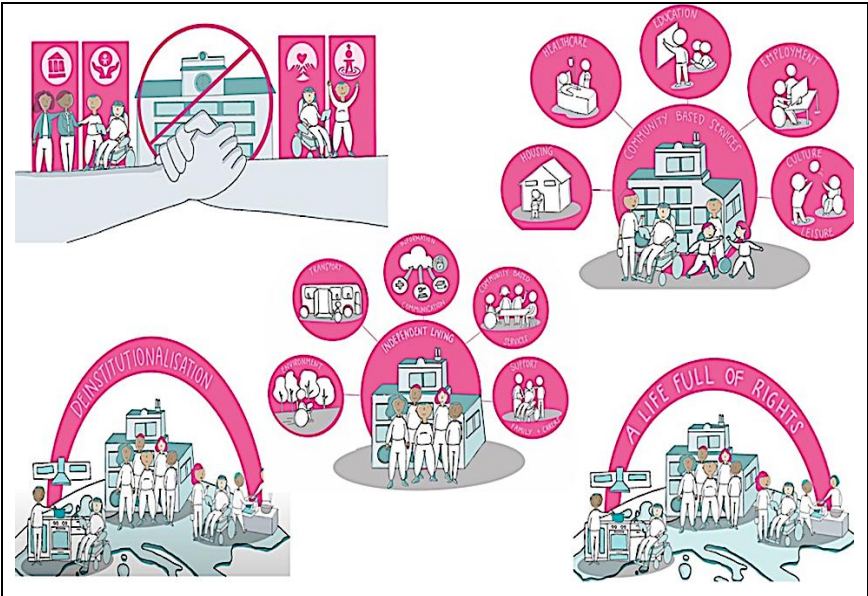


Figure 5. Case Study 3: What is Deinstitutionalisation and Independent Living?

Step	Description
A. <b>Immediate Visual Context:</b>	The visuals illustrate a shift from institutional environments to community involvement for those with cognitive disabilities. They utilize universal symbols and reference significant legal frameworks, such as the UN CRPD and EU directives, to bridge various levels of institutional discourse on a top-down approach. Illustrative cartoons simplify the legal norms composing the frameworks of “independent living” and “community-based services”, seen as concepts in their practical applications in everyday life.
B. <b>Immediate Verbal Context:</b>	The audio narrative enriches the visuals by emphasizing keywords (e.g. “rights”, “independence”), inclusive language (e.g., “we”) for shared responsibility and integration across society. The pairing of adjectives with nouns (e.g., “skillful individuals” and “independent living”), underlines legal frameworks that views individuals with disabilities as capable.
C. <b>Visual Cultural Context:</b>	The video showcases stylized characters, varied in ethnicity and abilities yet depicted in a consistent style. This reflects the EU’s commitment to inclusivity and cultural diversity, stressing unity within diversity.



<b>D. Mise en Scène and Rhetorical Topic of Arrangement:</b> The visuals strikingly contrast the legal frameworks of institutional life and community inclusion, symbolizing the shift from isolation to vibrant social participation. Expressively portrayed characters demonstrate a journey toward freedom and autonomy, breaking down ‘legal barriers’ to inclusivity, as framed by UN and EU legal documents. These documents are represented as booklets, narrating inclusion’s progress through cartoon sequences, avoiding speech bubbles. Handshake symbols signal community commitment to inclusivity, and buildings with crosses mark the removal of past barriers. A rainbow over the EU map signifies the journey toward integration and equality. It portrays the move from deinstitutionalization to a society that actualizes ethical and humanitarian principles through significant legal frameworks (e.g. the transition from guardianship legal frameworks to supported decision-making models).
<b>E. Ethical and Inclusive Representation:</b> Stereotypes and bias are prevented by focusing on what individuals with disabilities can achieve, supported by legal frameworks, rather than on their physical or cognitive limitations.
<b>F. Analysis of Auditory Elements:</b> Background music and synchronized narration enhance the message, aligning with visual storytelling.
<b>G. Digital Interactivity and Accessibility:</b> Webpage hyperlinks, social network sharing, and feedback mechanisms enhance engagement. Information is accessible, navigable, and shareable, with FAQs for support.

Table 6. Multimodal Analysis of Case Study 3.

3.3 Public Services and Wider Accessibility

The ‘Public Services and Accessibility’ Cluster delves into the EU’s discussions on ensuring accessibility in public services and beyond. Adjectives like ‘public’, ‘appropriate’, and ‘reasonable’ emphasize a commitment to ensuring fairness and practicality (Table 7).

Adjective (#Rank) (Frequency)	Notable N-Grams
Public (# 13) (173)	Public website on; public housing for older individuals; public and political life; public awareness about; public authorities and

	institutions.
Appropriate (#5) (284)	Appropriate measures to ensure; appropriate measures to eliminate; appropriate modifications and adjustments; appropriate steps to safeguard.
Reasonable (#17) (#115)	Reasonable accommodation measures; reasonable time.

Table 7. Key Adjectives in the ILFC within the Public Services and Wider Accessibility Cluster.

‘Public’ is a central adjective in the ILFC, reflecting a dedication to creating a community that is inclusive, accessible, and focused on welfare. It is frequently paired with action-oriented verbs such as ‘ensure’, ‘support’, and ‘assist’, highlighting the EU’s proactive efforts to diminish isolation and nurture a sense of belonging among all citizens (“...*Assist older persons in making their homes free of barriers to **public** transport ...*”). Beyond physical accessibility, public also underscores the importance of digital access and information sharing (“...*European policies promote a digital transformation and digital **public** services that are inclusive of and accessible for persons with disabilities...*”). Additionally, it strongly ties into fostering civic engagement through initiatives and campaigns aimed at raising awareness, thereby enhancing transparency within the governance framework (“...*the Commission should raise **public** awareness about the European citizens’ initiative ...*”).

Leveraging on the foundation of making public services widely accessible, the term ‘appropriate’ assumes a strategic meaning within the EU’s discussions on accessibility and inclusivity. Unlike its use in private law branches, where ‘appropriate’ might refer to the adequacy or compliance of actions and agreements, in the EU context, it carries a weightier implication. Here, ‘appropriate’ is about making sure actions and policies not only meet standards but also align with the EU’s values on human rights and democracy (“...*inclusive employment in the open labour market is the only **appropriate** means to fulfil the right of persons with disabilities...*”). The frequent pairing of ‘appropriate’ with binomials enriches the understanding. These include “appropriate and adequate”, “appropriate and beneficial”, “appropriate and individually desired”, and “appropriate and necessary”. They suggest that policies need to be robust, yield tangible

benefits, cater to individual needs, and ensure desired outcomes (“...*the exercise of legal capacity provide for appropriate and effective safeguards to prevent abuse...*”).

Complementarily, ‘reasonable’ serves as a key intermediary, bridging appropriate values and practical feasibility. It signifies a balance of fairness and proportionality, a meaning common across legal branches and jurisdictions. When paired with legal or operational terms such as ‘accommodation’ and ‘adjustments’, it aims to prevent exacerbating community tensions in a diverse and complex society. Balancing justice and equity in society, it ensures that modifications for disability access do not place undue burdens on implementers, especially private entities (“...**Reasonable** accommodation must be negotiated with the individual’s preferred solution unless it imposes undue burden...”).

The word cloud (Figure 6) encapsulates the EU’s dialogue on public services and broader accessibility efforts, with a pronounced focus on ‘Disability’ and ‘Support’. This visualization underscores the EU’s dedication to not only formulating policies and regulations but also to their effective implementation, ensuring real-life impact and improved social integration for individuals with disabilities and vulnerable groups. The prominent presence of ‘Employment’ indicates a significant focus on integrating these individuals into the workforce, reflecting the EU’s commitment to their empowerment. ‘Housing’ suggests the importance of accessible living spaces, essential for a dignified and independent lifestyle. ‘Health’ and ‘Rehabilitation’ underscore the commitment to holistic well-being and the importance of recovery processes. On the other hand, ‘Personal’ and ‘Effective’ highlight a tailored approach in service delivery, ensuring that support is not only available but also specifically suited to individual needs. Lastly, the inclusion of ‘Digital’ and ‘Online’ reflects the growing importance of technology in fostering inclusivity.



Figure 6. Word Cloud from Public Services and Accessibility Cluster.

The case study depicted in Figure 7 and discussed in Table 5 highlights a communication strategy tailored for individuals with physical disabilities. This strategy broadens the concept of accessibility to include not only legal rights but also various domains of social life, such as leisure, education, and employment. It effectively showcases an array of physical, administrative, and digital tools, providing explanations to support full engagement in these areas.

Unlike other content analyzed in this study, the imagery in this case avoids the iconographic simplification typically used for cognitive impairments (as seen in Figure 4). Rather than using emotionally resonant, stylized characters (depicted in Figure 2 and 3), these visuals opt for a more formal, infographic-style presentation. This method prioritizes clear depictions of actions and factual information, addressing the practical needs and concerns of the target audience. This aligns with the thematic focus of this cluster, which aims to explain how services are practically accessible.

Linguistically, despite being designated by the European Commission as Easy-to-Read (E2R) these materials display a range of discourse ergonomics that leans more towards plain language compared to other case studies explored in this research (as observed in Figures 2 and 4). This strategy ensures that the text's importance is preserved and not overshadowed by imagery. Although complex legal concepts like 'reasonableness' or 'appropriateness' are not explicitly detailed, this approach prioritizes concrete information over the mere depiction of ethical or legal principles.












<p><b>Work outside Europe</b></p>  <p><b>European Disability Card</b></p>  <p><b>Access to health care</b></p> 	<p><b>Access to education</b></p>  <p><b>European Accessibility Act</b></p> <p><b>Accessible</b></p> 	<p><b>Free movement</b></p> 
<p><b>Accessible</b></p> <p>Things are accessible when they are possible to use by persons with disabilities and all people. If things are not accessible, persons with disabilities can be left out. For example:</p> <ul style="list-style-type: none"><li>• If buildings do not have ramps, people in wheelchairs could not get in.</li><li>• If telephones are not accessible, blind people will not be able to use them to communicate like everyone else.</li></ul>		<p><b>European Accessibility Act</b></p> <p>This is a law that the European Union made to make more things and services in Europe accessible for persons with disabilities. For example:</p> <ul style="list-style-type: none"><li>• Cash machines</li><li>• Computers</li><li>• Televisions</li><li>• Ticket machines</li></ul> 
<p><b>European Disability Card</b></p> <p>The European Disability Card could make things easier for persons with disabilities when they visit or live in another country of the European Union. Thanks to this card, countries can recognise their disability and give them some advantages in culture, sports and other activities. For example, persons with disabilities can use this card to pay less when they buy tickets for museums or football matches. Or persons with intellectual disabilities can use this card and get information that is easy to read and understand.</p>		<p><b>3. Free movement</b></p> <p>Free movement means that all people in the European Union have the right to move, work, study and live in any country of the European Union. For example, a German person can move to France to study or work.</p> 
<p><b>7. Access to justice</b></p> <p>Access to justice means that people have the right to go to court when they feel they are treated badly or unfairly. The court will hear their story and act to protect them.</p> 		

Figure 7. Case Study 4: Union of equality. Strategy on the Rights of Persons with Disabilities.

Step	Description
A. <b>Immediate Visual Context:</b>	The images illustrate a commitment to ensuring the accessibility of services and environments for everyone, especially those with physical disabilities. Depictions of barrier-free access, from ATMs to public spaces, underscore the dedication to eliminating physical barriers. Meanwhile, images showcasing the freedom of movement highlight opportunities for barrier-free access to services.
B. <b>Immediate Verbal Context:</b>	Clear language simplifies policies and laws. Introductory explanations (e.g. “access to justice means that” or “this is a law that”) make complex concepts more comprehensible. Collocations like “thanks to this card” effectively underscore the real-world impact of EU initiatives, linking legislative actions to practical benefits for citizens. This connection is further emphasized by the qualitative adjectives “accessible” and “easier”.
C. <b>Visual Cultural Context:</b>	Universal symbols convey the EU’s inclusivity, such as the European Disability Card and the European Accessibility Act icons. This approach transcends cultural differences, promoting a unified vision of accessibility across member states.
D. <b>Mise en Scène and Rhetorical Topic Arrangement:</b>	The strategic arrangement of topics systematically unfolds the narrative, showcasing the practical application of accessibility laws. The principle of appropriateness, though not explicitly named, is implied through depictions of individuals with disabilities participating in activities such as work and education. This indicates that the tools and measures depicted are thoughtfully designed and effective for their needs. Additionally, the progression from simple to complex modifications across everyday scenarios—from work and health to banking and travel—subtly conveys the concept of reasonableness. This indirect presentation suggests a range of sensible adaptations. The inclusion of people with and without disabilities in daily scenes highlights that the accommodations made are prudent and beneficial for all, emphasizing a balanced and equitable approach to inclusivity.
E. <b>Ethical and Inclusive Representation:</b>	The visuals consciously avoid depicting individuals with disabilities as isolated or using empathetic icons. Instead, they showcase a cohesive social setting where diversity is seamlessly integrated into the fabric of the community.
F. <b>Analysis of Auditory Elements:</b>	Not applicable in this context.
G. <b>Digital Interactivity and Accessibility:</b>	Webpage hyperlinks, social

network sharing, and feedback mechanisms enhance engagement. Information is accessible, navigable, and shareable, with FAQs for support.
--

Table 8. Multimodal Analysis of Case Study 4.

4. Discussion

The study delved into the ongoing evolution and challenges that define the landscape of transparent and accessible communication. The findings reveal the socio-semiotic and context-specific dimensions of legal discourse. Far from being universal and abstract, it can be adapted and reshaped to reflect societal and political stances on regulated issues.

The ergonomic nature of legal discourse allows it to seamlessly integrate into the fabric of societal values, cultural contexts, and technological advancements. Through various modes and mediums, the EU employs it to foster a sense of belonging, empowerment, and inclusivity among vulnerable communities. This, in turn, can promote broader societal cooperation and understanding.

Upon investigating the first research question, which concerns the identification of thematic clusters in EU binding documents, three primary interlinked areas have emerged. This study designates them innovatively as ‘Rights and Social Inclusion’, ‘Legal Framework and Institutional Aspects’, and ‘Public Services and Accessibility’, highlighting the core themes found within the European *acquis* on the rights of vulnerable groups.

Moving to the second research question, which investigates how prevalent clusters in prescriptive EU documents are translated into Easy-to-Understand (E2U) resources for dissemination to vulnerable groups, the multimodal analysis reveals a holistic approach. This strategy integrates visual elements, such as universally recognizable icons and stylized characters, with clear, jargon-free language to emphasize inclusivity, accessibility, and equity.

In exploring the third research question, which assesses the impact of digitalization and simplification strategies on EU legal discourse, a sophisticated approach emerges within this supranational organization that seamlessly merges innovation with tradition.

On one hand, the use of various web formats, hyperlinks, videos, FAQs, feedback options, and social media sharing

significantly enhances accessibility and engagement. On the other hand, a strictly institutional and asymmetrical approach remains evident through the use of a hierarchical layout. This traditional narrative structure begins with formal symbols (See Figure 1), such as the EU flag and UN emblem, and often concludes with acknowledgments of rights and appeals for advocacy (See Figure 4 and 5). This method fosters institutional continuity and credibility, contrasting with the horizontal visuals of private law innovations, like comic contracts with speech bubbles.

From a content-focused perspective, further examination of the potential of digitalization to empower vulnerable communities reveals that significant challenges remain despite considerable progress. This aligns with Yi's (2023) findings, which highlight the importance of ensuring equality and achieving substantive equity, especially within increasingly multicultural communities where ethical and diverse communication poses additional challenges.

Consequently, the analysis of two functionally different corpora using a mixed-methods approach reveals that complex concepts such as 'reasonableness' or 'appropriateness' (refer to Section 3.3) are often subtly implied in Easy-to-Understand documents. This oversimplification risks diminishing the richness and depth of legal ideas, potentially leading to the loss of crucial subtleties and causing misrepresentation.

These insights underscore the need for a sustained, research-driven approach to refine easy language and accessibility strategies. This effort will ensure that these methods effectively represent and convey complex legal concepts in ways that genuinely empower and engage vulnerable communities. This sentiment is echoed by Inclusion Europe, which calls for continuous research and development: "We need easy language [...] To have good enough easy language and good enough accessible communication, we need research to create *the best possible* easy language" (2022, emphasis added).

## **5. Implications for further studies**

This study has significant implications for future research in the digital humanities, particularly for scholars focusing on legal



communication through the lens of discourse ergonomics (Beaudet 2001). It underscores how legal discourse, as a specialized form of communication, can be effectively tailored to engage various reader groups, including vulnerable communities, while still upholding the institutional ethos.

Importantly, the innovative methodology employed in this study provides a robust framework for navigating the evolving landscape of multimodal legal communication. This methodology is pivotal as it highlights the importance of thematic cluster analysis as a *tertium comparationis* within a mixed-methods approach. By integrating quantitative corpus-driven research with qualitative multimodal analysis, this approach offers a comprehensive tool for exploring dimensions of semantic values that are often overlooked by traditional linguistic methods.

These promising developments underscore the urgent need for increased engagement from policymakers and institutional stakeholders. The integration of big data analysis, computational techniques, and Smart Governance principles (Furtado et al. 2023) provides a viable solution to the enduring challenge of developing Easy-to-Understand (E2U) resources.

Conventional methods, which rely solely on human intuition to support intersemiotic translation, often prove costly and time-consuming, struggling to keep pace with the rapid release and large volume of binding legal documents. Utilizing data-driven approaches and digital visualization tools could facilitate a more precise and innovative synthesis of diverse legal sources, potentially offering significant assistance to legal translators and linguists in their work.

While this study is confined to Easy-to-Read (E2R) and Easy-to-Understand (E2U) texts within the European Union, it suggests opportunities for broader exploration. Future research could extend the study's framework to similar legal texts across various national, supranational, and international contexts. One key area of investigation could be whether the identified thematic clusters—'Rights and Social Inclusion', 'Legal Framework and Institutional Aspects', and 'Public Services and Accessibility'—are consistent across different jurisdictions. Exploring this could illuminate the uniformity and diversity within legal discourse and inform the adaptation of simplified (E2R and E2U) formats across different jurisdictions.

Ensuring that no one is left without access to their rights, while preserving the distinct characteristics inherent in fundamental

legal principles, requires ongoing commitment and careful refinement. This objective should also align with the need to create materials that enable vulnerable groups to perceive the law not merely as a set of rules, but as part of a broader, value-driven, and ethical framework that is essential for societal governance and protection.

## **Conflict of interest**

The author declares that there is no conflict of interest.

## **AI Use statement**

The author confirms that artificial intelligence (AI) tools were not used in any aspects of this research.

## **Bibliography**

- ABBY. 2021. FineReader PDF 15 (Software). <https://www.abby.com/finereader/>.
- Andersen, Camilla. 2018. Comic Contracts and Other Ways to Make the Law Understandable. *The Conversation*. Retrieved from: <https://theconversation.com/comic-contracts-and-other-ways-to-make-the-law-understandable-90313> (accessed January 8, 2024).
- Andersen, Camilla Baasch, and Peter Corner. 2022. Making Contracts Readable - Developing Contracts in Comic Book Form. *Transnational Commercial Law Review* 1 (2): 1–24. DOI: <https://doi.org/10.26494/tclr220226>.

- Anthony, Laurence. 2019. AntConc, version 3.5.8 (Computer Software). Tokyo, Japan: Waseda University, <http://www.laurenceanthony.net/software/antconc>.
- Anthony, Laurence. 2022. TagAnt, version 2.0.4 (Computer Software). Tokyo: Waseda University, <http://www.laurenceanthony.net/software/tagant>.
- Arias-Badia, Blanca, and Anna Matamala. 2020. Audio Description Meets Easy-to-Read and Plain Language: Results from a Questionnaire and a Focus Group in Catalonia. *Zeitschrift Für Katalanistik* 33: 251–70, DOI: <https://doi.org/10.46586/ZfK.2020.251-270>.
- Beaudet, Céline. 2001. Clarté, Lisibilité, Intelligibilité Des Textes: Un État de La Question et Une Proposition Pédagogique. *Recherches En Rédaction Professionnelle* 1 (1): 1–19.
- Bernabé, Rocío. 2020. *Easy Audiovisual Content for All: Easy-to-Read as an Enabler of Easy, Multimode Access Services*. PhD diss., Universitat Autònoma de Barcelona.
- Bernabé, Rocío, and Pilar Orero. 2020. Easy to Read as Multimode Accessibility Service. *Hermeneus* 21: 53–74. DOI: <https://doi.org/10.24197/her.21.2019.53-74>.
- Botes, Marietjie. 2017. Using Comics to Communicate Legal Contract Cancellation. *The Comics Grid: Journal of Comics Scholarship* 7 (1): 1–21. DOI: <https://doi.org/10.16995/cg.100>.
- Brunschwig, Colette R. 2019. Contract Comics and the Visualization, Audio-Visualization, and Multisensorization of Law. *University of Western Australia Law Review* 46: 191–217.
- Buehler, Erin, William Easley, Amy Poole, and Amy Hurst. 2016. Accessibility Barriers to Online Education for Young Adults with Intellectual Disabilities. In *Proceedings of the 13th International Web for All Conference*, 1–10. Montreal Canada: ACM. DOI: <http://doi.acm.org/10.1145/2899475.2899481> (accessed January 8, 2024).
- Canepari, Michela. 2019. Different Texts for Different (Legal) Languages: In Search of a New Approach. *International Journal of Linguistics* 11 (6): 111–34. <https://doi.org/10.5296/ijl.v11i6.15787>.
- Canepari, Michela. 2023. Intralingual and Intersemiotic Translation for Accessibility in Educational and Social Environments-

- Focus on Legal Language. *Comparative Legilinguistics* 56: 147–70. DOI: <https://doi.org/10.14746/cl.56.2023.1>.
- Carrer, Luisa. 2021. The Case for Easy Italian: An Empirical Study on the Impact of Translators Strategies on Text Comprehensibility. In *3rd Swiss Conference on Barrier-Free Communication* (BfC 2020), 141–222.
- Chinn, Deborah, and Susan Buell. 2021. Easy Language in the UK. In *Handbook of Easy Languages in Europe*, eds. Camilla Lindholm and Ulla Vanhatalo, 623–657. Berlin: Frank & Timme. DOI: <https://doi.org/10.26530/20.500.12657/52628>.
- Doczekalska, Agnieszka, and Łucja Biel. 2022. Interlingual, Intralingual and Intersemiotic Translation in Law. *Translation Beyond Translation Studies*: 99–118. DOI: <https://doi.org/10.5040/9781350192140.ch-6>.
- European Commission. 2017. European Pillar of Social Rights. <https://ec.europa.eu/social/main.jsp?catId=1311&langId=en> (accessed January 8, 2024).
- European Commission. 2024. Translation and Drafting Resources. [https://commission.europa.eu/resources-partners/translation-and-drafting-resources\\_en](https://commission.europa.eu/resources-partners/translation-and-drafting-resources_en) (accessed January 8, 2024).
- European Union. 2011. Directive 2011/93/EU on combating the sexual use and sexual exploitation of children and child pornography, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011L0093> (accessed January 8, 2024).
- European Union. 2013. Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013L0033> (accessed January 8, 2024).
- European Union. 2016. Directive 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016L2102> (accessed January 8, 2024).
- European Union. 2020. EU Action Plan for Digital Accessibility. <https://education.ec.europa.eu/focus-topics/digitaleducation/action-plan> (accessed January 8, 2024).

- Foley, Richard. 2002. Legislative Language in the EU: The Crucible. *International Journal for the Semiotics of Law* 15 (4): 361–74. DOI: <https://doi.org/10.1023/A:1021203529151>.
- FRA, Fundamental Rights Agency 2022. Report on Digital Accessibility, <https://fra.europa.eu/en/publication/2022/fundamental-rights-report-2022> (accessed January 8, 2024).
- Furtado, Lara Sucupira, Ticiana Linhares Coelho da Silva, Marianna Gonçalves Fontenele Ferreira, José Antônio Fernandes de Macedo, and Jessika Kantnila de Melo Lima Cavalcanti. 2023. A Framework for Digital Transformation towards Smart Governance: Using Big Data Tools to Target SDGs in Ceará, Brazil. *Journal of Urban Management* 12 (1): 74–87. DOI: <https://doi.org/10.1016/j.jum.2023.01.003>.
- Gerhart, Eugene C. 1969. *Quote It!: Memorable Legal Quotations: Data, Epigrams, Wit, and Wisdom from Legal and Literary Sources*. New York, N.Y.: Clark Boardman Co.
- Giaconi, Catia, Noemi Del Bianco, Ilaria D'Angelo, Samah Halwany, and Simone Aparecida Capellini. 2021. Cultural Accessibility of People with Intellectual Disabilities. A Pilot Study in Italy. *JESET* 7: 16–26. DOI: <https://doi.org/10.18844/jeset.v7i1.7013>.
- Giamperri, Patrizia. 2024. Key N-Grams in EU Directives and in the UK National Legislation on Consumer Contracts. *International Journal for the Semiotics of Law - Revue Internationale de Sémiotique Juridique* 37 (1): 59–75. <https://doi.org/10.1007/s11196-023-10087-y>.
- Haapio, Helena, Daniela Plewe, and Robert deRooy. 2016. Next Generation Deal Design: Comics and Visual Platforms for Contracting. In *Networks. Proceedings of the 19th International Legal Informatics Symposium IRIS*, 373–80.
- Hansen-Schirra, Silvia, and Christiane Maaß. 2020. Easy Language, Plain Language, Easy Language plus: Perspectives on Comprehensibility and Stigmatisation. *Easy Language Research: Text and User Perspectives* 2: 17–38. DOI: <https://doi.org/10.26530/20.500.12657/42089>.
- Harding, Rosie. 2023. Making Legal Information Accessible and Supporting Vulnerable Clients. *Journal of Elder Law and Capacity* 2023. Spring: 15–34.

- Hurd, Hollis T. 1982. *Writing for Lawyers*. Pittsburg: Journal Broadcasting & Communications.
- Inclusion Europe. 2009. *Information for All: European Standards for Making Information Easy to Read and Understand*. Retrieved from <https://www.inclusion-europe.eu/easy-to-read-standards-guidelines/> (accessed January 8, 2024).
- Inclusion Europe. 2014. *Zero Project Award*. <https://www.inclusion-europe.eu/inclusion-europe-project-earns-recognition-from-zero-project/> (accessed January 8, 2024).
- Inclusion Europe. 2022. *Handbook of Easy Languages in Europe: An Interview with Camilla Lindholm and Ulla Vanhatalo*. Inclusion Europe Radio. Podcast, December 20. <https://www.inclusion-europe.eu/handbook-of-easy-languages-in-europe/> (accessed January 8, 2024).
- Inclusion Europe. 2024. *About us*. <https://www.inclusion-europe.eu/about-us/> (accessed January 8, 2024).
- JRC, Joint Research Centre. 2023. *Report on Digital Innovation*. Retrieved from <https://digital-strategy.ec.europa.eu/en/library/2023-report-state-digital-decade> (accessed January 8, 2024).
- Keating, Adrian, and Camilla Baasch Andersen. 2020. *Engineering Visual Contracts: Using If-Then Thinking to Develop Behavior Drivers for Imaging*. *Journal of Open Access to Law* 8: 1–17.
- Ketola, Anne. 2021. *Visual Explication in Intersemiotic Translation. STRIDON: Studies in Translation and Interpreting* 1(1): 103–122. DOI: <https://doi.org/10.4312/stridon.1.1.103-122>.
- Ketola, Anne, Eliisa Pitkäsalo, and Robert de Rooy. 2023. *Contracts via Comics: Migrant Workers and Thai Fishing Vessel Employment Contracts*. In *Comics and Migration*, eds. Ralf Kauranen, Olli Löytty, Aura Nikkilä and Anna Vuorinne, 78–91. 1st ed. London: Routledge India.
- Ketola, Anne, de Rooy, Robert, and Haapio, Helena. 2024. *Comic Contracts 2.0 – Contracts that Have (and Give) a Voice*. In *Design(s) for Law*, eds. Rossana Ducato, Alain Strowel and Enguerrand Marique. Milano: Ledizioni.
- Kimble, Johseph. 1992. *Plain English: A Charter for Clear Writing*. *Thomas M. Cooley Law Review* 9: 1–58.

- Loddo, Olimpia Giuliana. 2022. Intersemiotic Legal Translation: Semiotic Pluralism in Normative Drafting. *Global Jurist* 22 (3): 537–555. DOI: <https://doi.org/10.1515/gj-2022-0011>.
- Loddo, Olimpia Giuliana. 2023. What Is Intersemiotic Legal Translation? In *Intersemiotic Legal Translation*, ed. Olimpia G. Loddo, 5–28. *Law and Visual Jurisprudence* series. Cham: Springer International Publishing. DOI: [https://doi.org/10.1007/978-3-031-44184-4\\_2](https://doi.org/10.1007/978-3-031-44184-4_2).
- Ma, Yueyuan. 2022. Specialization in a Knowledge Economy (March 8), SSRN, <https://ssrn.com/abstract=4052990>. DOI: <http://dx.doi.org/10.2139/ssrn.4052990> (accessed January 8, 2024).
- Maaß, Christiane. 2020. *Easy Language – Plain Language – Easy Language Plus: Balancing Comprehensibility and Acceptability*. Berlin: Frank & Timme. DOI: <https://doi.org/10.26530/20.500.12657/42089>.
- Maksimova, Svetlana Yu, and Kseniya V. Matsyupa. 2022. Legalese or lawspeak–diversity within the unity. *Language* (2) 7: 63–73. DOI: <https://doi.org/10.15405/epsbs.2022.01.68>.
- Matamala, Anna. 2021. Easy-to-Understand Language beyond the Written Wor(l)d: The Challenges of Making Audiovisual Media Easy to Understand. In *Proceedings of the International Easy Language Day Conference (IELD 2021)*, DOI: <https://ddd.uab.cat/record/240781> (accessed January 8, 2024).
- Mellinkoff, David. 1963. *The Language of the Law*. Boston: Brown Little.
- Mirić, Filip. 2022. Communication with People with Disabilities. In *Intersectional Discrimination of Women and Girls with Disabilities and Means of Their Empowerment*, eds. Ljubinka Kovačević, Dragica Vujadinović and Marco Evola, 917–930. Belgrade: University of Belgrade Faculty of Law.
- Miesenberger, Klaus, and Andrea Petz. 2014. Easy to Read on the Web - State of the Art and Research Directions. *Procedia Computer Science* 27: 318–326. DOI: <https://doi.org/10.1016/j.procs.2014.02.035>.
- Murray, Michael D. 2021a. Cartoon Contracts and the Proactive Visualization of Law. *University of Massachusetts Law Review* 16: 98–197. DOI: <https://doi.org/10.2139/ssrn.3502568>.

- Murray, Michael. 2021b. Cross-Cultural Communications in a Crisis: The Universality of Visual Narrative in the COVID-19 Pandemic. *Albany Law Journal of Science & Technology* 32: 1–40. DOI: <https://doi.org/10.2139/ssrn.3886182>.
- Murray, Michael D. 2021c. Toward a Universal Visual Language of Law. *Law & Psychology Review* 46: 1–95. DOI: <https://doi.org/10.2139/ssrn.3784979>.
- Nerelius, Ulrika. 2014. *Plain Language in the EU: Impact of Plain Language in Drafting and Translation of Different Types of EU Legislation*. MA Thesis., Stockholm University.
- Newmark, Peter. 2003. *A Textbook of Translation*. 7th impression. London: Prentice Hall International.
- Notari, Fabiola. 2019. Mastering Numbers in Legal Discourse: Pragmatic Perspectives and Translation Issues. *La Torre di Babele* 15: 95–128.
- Perego, Elisa, and Goranka Rocco. 2022. The UN Convention on the Rights of Persons with Disabilities: A Comparative Analysis of the Easy English, the Easy German and the Easy Italian Versions. *Rivista internazionale di tecnica della traduzione* 24: 63–87.
- Pitkäsalo, Eliisa. 2020. Traduction Intersémiotique et Contexte: Des Contrats En Bande Dessinée En Tant Que Documents Juridiques Accessibles. *Meta* 65 (1): 123–41. <https://doi.org/10.7202/1073639ar>.
- Pitkäsalo, Eliisa, and Laura Kallioma-Puha. 2019. Democratizing Access to Justice: The Comic Contract as Intersemiotic Translation. *Translation Matters* 1 (2): 30–42. [https://doi.org/10.21747/21844585/tm1\\_2a2](https://doi.org/10.21747/21844585/tm1_2a2).
- Raymaker, Dora M., Steven K. Kapp, Katherine E. McDonald, Michael Weiner, Elesia Ashkenazy, and Christina Nicolaidis. 2019. Development of the AASPIRE web accessibility guidelines for autistic web users. *Autism in Adulthood* 1 (2): 146–157, <https://doi.org/10.1089/aut.2018.0020> (accessed January 8, 2024). <https://doi.org/10.1089/aut.2018.0020>.
- Šarčević, Susan. 1997. *New Approach to Legal Translation*. The Hague/London/Boston: Kluwer Law International.
- Seracini, Francesca. 2019. Simplifying EU Legislative Texts: The Contribution of Translation. In *Worlds of Words: Complexity, Creativity, and Conventionality in English Language, Literature and Culture, Vol. 1*, eds. Veronica Bonsignori,



- Gloria Cappelli and Elisa Mattiello, 325–336. Pisa: Pisa University Press.
- Tiersma, Peter M. 1999. *Legal Language*. University of Chicago Press.
- United Nations. 2006. Convention on the Rights of Persons with Disabilities (CRPD), <https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf> (accessed January 8, 2024).
- United Nations. 2015. 17 goals to transform our world. <https://www.un.org/en/exhibits/page/sdgs-17-goals-transform-world> (accessed January 8, 2024).
- University of Ljubljana. 2016. Orange Data Mining Software version 3.3. (Software). Ljubljana: University of Ljubljana.
- Wagner, Anne. 2003. Translation of the Language of the Common Law into Legal French: Myth or Reality. *International Journal for the Semiotics of Law* 16 (2): 177–193.
- Williams, Christopher. 2004. Legal English and Plain Language: An Introduction. *ESP across Cultures* 1 (1): 111–24.
- Williams, Christopher. 2022. *The Impact of Plain Language on Legal English in the United Kingdom*. New York: Routledge.
- Xanthaki, Helen. (2019). *Judges v Drafters: The Saga Continues*. Sydney: The Federation Press.
- Xanthaki, Helen. (2022). *Thornton's Legislative Drafting*, 6th ed. London: Bloomsbury. <https://doi.org/10.1093/slr/hmac014>.
- Yi, R. 2023. The Promise of Linguistic Equity for Migrants in Australian Courtrooms: A Cross-Disciplinary Perspective. *Austl. J. Hum. Rts.* 29(1): 174–180. DOI: <https://doi.org/10.1080/1323238X.2023.2232171>.

## Case studies

- Case Study 1. What are the 20 principles of the European Pillar of Social Rights? (Webpage), <https://ec.europa.eu/social/main.jsp?catId=1567&langId=en&> (accessed January 8, 2024).
- Case Study 2. Role of the European Union in Deinstitutionalisation and Independent Living (Webpage), <https://www.inclusion->

[europe.eu/role-of-the-european-union-in-deinstitutionalisation-and-independent-living-easy-to-read/](https://europe.eu/role-of-the-european-union-in-deinstitutionalisation-and-independent-living-easy-to-read/)  
(accessed January 8, 2024).

Case Study 3. What is Deinstitutionalisation and Independent Living? (Video), <https://www.youtube.com/watch?v=DjVy3lenHOc>  
(accessed January 8, 2024).

Case Study 4. Union of equality. Strategy on the rights of persons with disabilities 2021-2030 (Webpage), <https://ec.europa.eu/social/main.jsp?catId=1535&langId=en>  
(accessed January 8, 2024).