

Introduction

Content name: CMA draft_guidance unfair contract terms

Content category:

Report generated: 19/03/2026

Key issues

-  **Complex sentences**
High percentage of complex sentences.
 -  **Complex sentences sentence structure**
High percentage of sentences with poor structure.
 -  **Complex, challenging and long words**
High percentage of complex, challenging or long words.
 -  **Challenging words**
Average percentage of challenging words.
 -  **Complex sentences long words**
Average percentage of sentences with overuse of long words.
 -  **Complex sentences uncommon language**
Average percentage of sentences with excessive uncommon language.
 -  **Long words**
Average percentage of long words.
 -  **Sentence length**
Long sentences can overload the brain. When a sentence has too many ideas, it's harder to remember everything while reading.
 -  **Syllables per word**
Average percentage of long words. Remove or replace as many as possible.
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Intelligibility

Intelligibility score

The Amplifi Intelligibility Score shows how easy a document is to read and understand. The score runs from 1 to 100 - the higher the score, the clearer and more understandable the content. Use this score to identify content that may be difficult for readers and need simplification. It's the best way to measure and manage intelligibility risk across your documents.



● Level 2

Your content is likely to be understood by a reader who has at least an undergraduate degree education or professional equivalent. This equates to around 34% of the UK adult population.

Compliance

By testing the intelligibility of the content, you are working towards compliance with the following requirements of the Consumer Duty:

- Communications to retail customers: 2A.5.3, 2A.5.6, 2A.5.7, 2A.5.8
- Testing, monitoring and adapting communications: 2A.5.10, 2A.5.11, 2A.5.13
- Design and delivery of customer support: 2A.6.2, 2A.6.3
- Characteristics of vulnerability: 2A.7.4 (3)
- Monitoring retail customer outcomes: 2A.9.9

By reporting on the results of the testing and communicating this information, you are working towards compliance with the following requirements of the Consumer Duty:

- Governance, strategy and policies: 2A.8.1
- Governing body reporting: 2A.8.3, 2A.8.5
- Monitoring customer outcomes: 2A.9.9 (3)
- Record keeping: 2A.9.15

Compliance targets

You have compliance issues to resolve 

Metric	Target	Actual
 Intelligibility level	Level 4	Level 2

Productivity

Total edits

0 edits

Complexity drivers

Current score

Improvement

Complex words

Complex words are technical terms that people don't often use in everyday conversation. They are conceptually difficult and usually found in specialised areas like finance or law, where they carry specific meanings. Readers who aren't familiar with those fields may find these words hard to understand.

<1%

Complex words

0%

Challenging words

Challenging words are terms that people might not use often in everyday conversation, or words that can have different meanings depending on the context - for example, "board" can mean a piece of wood or a group of company directors. These words are generally easier to understand than complex terms, but they can still cause confusion if readers aren't familiar with how they're being used.

9%

Challenging words

0%

Complex phrases

Complex phrases are expressions or jargon that make sentences longer or less direct than they need to be. They can often be removed or replaced with one or more simpler words. Keeping these phrases makes it harder for readers to quickly understand what a sentence means.

333

Complex phrases

0%

Complex sentences: Poor sentence structure

Sentences with poor structure often pack in too much information at once. To make your writing easier to read, try breaking these sentences into shorter ones. This lets readers take in one idea at a time and makes your writing much clearer and easier to understand.

25%

Complex sentences

0%

Complex sentences: Multiple complex words

Sentences which contain multiple complex words are difficult for readers to understand. Every unfamiliar or complex word forces the reader to pause and think about its meaning. When there are too many in one sentence, the brain has to work much harder to process and understand the information.

3%

Complex sentences

0%

Complex sentences: Use of uncommon language

Excessive use of uncommon language within a sentence can disrupt the natural rhythm of reading. Instead of gliding through a sentence, the reader may stumble over words, which means comprehension is slower and text is difficult to understand.

11%

Complex sentences

0%

Complex sentences: High volume of long words

Long words take more effort to read and process. Their overuse within a sentence makes it difficult for readers to understand.

8%

Complex sentences

0%

Complex concepts

Complex concepts are often financial or legal terms that can be tricky for people to understand. You might not be able to remove or simplify them, so make sure to explain them clearly in simple terms.

15

Complex concepts

0%

Long words

Long words increase the cognitive load on reader and are used less frequently in everyday language. This makes them difficult to understand.

4%

Words

0%

Compliance

By testing the complexity of the content, you are working towards compliance with the following requirements of the Consumer Duty:

- Communications to retail customers: 2A.5.3, 2A.5.6, 2A.5.7 (2), 2A.5.8 (1)
- Testing, monitoring and adapting communications: 2A.5.10, 2A.5.11, 2A.5.13
- Design and delivery of customer support: 2A.6.2, 2A.6.3 (3)
- Characteristics of vulnerability: 2A.7.4 (3)
- Monitoring retail customer outcomes: 2A.9.9

Writing style

Current score

Improvement

Average paragraph length

Long paragraphs with multiple clauses or phrases can make it unclear how ideas relate to each other. This can make it difficult for readers to understand.

28

Words per paragraph

0%

Average sentence length

Long sentences can overload the brain. When a sentence has too many ideas, it's harder to remember everything while reading.

18.5

Words per sentence

0%

Average syllables per word

Average syllables per word is a component of Intelligibility. Shorter words with fewer syllables are typically easier to read.

1.7

Syllables

0%

Passive voice

Passive voice isn't always wrong, but it can make writing weaker and harder to follow. It hides who is doing the action, often uses more words, and can make sentences feel less direct. Using active voice instead usually makes your writing clearer, stronger, and easier to read

329

Passive voice count

0%

Adverbs

Where possible, unnecessary adverbs should be avoided when drafting because they weaken writing. Strong verbs make your writing more powerful, engaging and concise.

920

Adverb count

0%

Readability score

Readability is generated by the Flesch-Kincaid reading ease score.

41

Score

0%

Reading age

Reading age and readability alone have been shown in numerous studies to be a poor predictor of intelligibility and reader understanding. It should only be used as guide to how fluently text can be read.

16-18

Age

Reading time

3h 48m

Time

Word count

39036

Words

Compliance

By testing the readability of the content, you are working towards compliance with the following requirements of the Consumer Duty:

- Communications to retail customers: 2A.5.3, 2A.5.6, 2A.5.7 (1), 2A.5.8 (1)
- Testing, monitoring and adapting communications: 2A.5.10, 2A.5.11, 2A.5.13
- Design and delivery of customer support: 2A.6.2, 2A.6.3 (3)
- Characteristics of vulnerability: 2A.7.4 (3)

Common complex words

	Word	Count
1	statutory	42
2	contractual	41
3	arbitration	22
4	resolution	14
5	proceedings	13
6	regulatory	13
7	sanctions	13
8	sanction	12
9	discretion	11
10	exhaustive	9
11	incurred	9
12	negligence	8
13	detriment	7
14	compliance	6
15	incorporated	6
16	investigatory	5
17	legislative	5
18	monetary	5
19	omission	4
20	undertakings	4

Common complex concepts

	Concept	Count
1	terms and conditions	10
2	guarantee	9
3	financial sanctions	6
4	guarantees	6
5	legal proceedings	6
6	financial sanction	5
7	pre-contract information	5
8	bank of england base rate	3
9	repayment	2
10	biometric data	1
11	conveyancing	1
12	credit costs	1
13	exchange rate	1
14	fixed rate	1
15	governing law	1
16	interest rate	1
17	intermediary	1
18	key information documents	1
19	legal obligation	1
20	loan agreement	1

Scoring for personas

The Amplifi personas represent a percentage of the UK adult population. All personas are created from a cross section of adults aged between 16-65.

Name	Level	Explanation
High income (top 20%)	● Level 2	A person who earns £44,000 or above.
Pre-GCSE level education	● Level 2	A person who has a pre GCSE level education.
Poor health	● Level 2	A person who has self identified as having either poor or fair health status.
Non-native speaker	● Level 2	A person whose first language is not English.
Low education, non-native speaker	● Level 1	A person who has a pre GCSE level education and English is not their first language.

Amplifi intelligibility score

Levels	Score	Reach*
● Level 5	91-100	Your content is likely to be understood by a reader who has a pre GCSE level of education. This equates to over 90% of the UK adult population.
● Level 4	71-90	Your content is likely to be understood by a reader who has a GCSE level of education. This equates to around 82% of the UK adult population.
● Level 3	61-70	Your content is likely to be understood by a reader who has at least a GCSE (A*-C) education or equivalent. This equates to around 72% of the UK adult population.
	51-60	Your content is likely to be understood by a reader who has at least an A Level education or equivalent. This equates to around 58% of the UK adult population.
● Level 2	26-50	Your content is likely to be understood by a reader who has at least an undergraduate degree education or professional equivalent . This equates to around 34% of the UK adult population.
● Level 1	0-25	Your content is likely to be understood by a reader who has at least a postgraduate degree education or equivalent level of professional experience . This equates to around 10% of the UK adult population.

*The Amplifi reach is intended for use only as a guide. Based on published research.

Scoring thresholds

The scoring thresholds show a target range for each of the key metrics. The colour coding represents what range the current score for a metrics falls into.

● Good	Metrics with a good score are in the target range.
● Average	Metrics with an intermediate score can be improved further. Any improvement will have a positive impact on the overall content intelligibility.
● Bad	Metrics with a bad score are having a negative impact on overall content intelligibility and should be addressed as a priority.