

Plain Language Act Repeal Bill



New Zealand Council Of
Christian Social Services

May 2025

Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes this feedback opportunity. Access to government services and information is critical for all New Zealanders. If this is not available in an accessible and understandable way this can have a negative impact on people's lives. The Plain Language Act 2022 (the Act) is a valuable part of efforts to improve this. We oppose its repeal.

Taunakitanga | Recommendations

Some New Zealanders face extra hurdles to navigating government systems

All New Zealanders rely on our government systems and information including welfare, health, immigration and justice systems, as well as consumer protections and employee rights. NZCCSS members provide support in the community to people and whānau experiencing social needs. These people may have frequent, high stakes contact with government agencies.

The language used by government agencies can be very hard to understand. Every day NZCCSS members support people who feel confused and disempowered by bureaucratic language. It is critical that communication and services from government respond to the variety of needs people have. The people and whānau we support face extra hurdles to getting their needs met:

- Low levels of education and low literacy levels.
- Physical or intellectual disabilities, including visual and hearing impairments, and dyslexia.
- English as a second language.
- Suspicion of government and discomfort with Pakeha institutions.
- Limited digital access and low comfort with digital information.
- High levels of general life stress.
- Comprehension challenges related to aging.

The language used by government agencies affects people's lives

Complex government language contributes to people's marginalisation. It prevents them from understanding their rights and advocating for themselves.

Poor communication by government agencies has real impacts. Our members regularly encounter real life examples: [1]

- Young people ending up homeless on the streets because they can't navigate Work & Income requirements.
- Low wage workers not understanding their contractual rights and responsibilities.

- People in the court system not understanding what is happening to them.
- Older people being supported by the health system in the community feeling confused and isolated.

Concerns are frequently raised in the social sector that the complexity of government systems requires advocates to help people navigate them. Much of this support would be unnecessary if plain language was used. Our members would prefer to spend their time helping people in other ways.

Communication failures by government agencies may contribute to key social issues:

- Marginalised groups not getting necessary health support, screening, and treatment. For example, the significantly lower uptake of Bowel cancer screening by Māori and Pacific populations [2].
- Valuable policy settings getting underutilised by those who need them. For example, the lower-than-expected uptake of the Family Boost.
- Declining trust in government, a key concern around the world [3].
- Lack of engagement with democracy. Even a basic understanding of how to vote can be a challenge for many [1].

The Act provides useful tools for improving plain language

The Act is a valuable tool for improving communication for all New Zealanders. It requires agencies to take ownership of the issue and to report on it. This ensures that it stays a priority.

Without the Act, plain language will slip off work programmes and into the ‘nice to have’ category. The harm this causes can be very real, particularly for New Zealanders experiencing systemic barriers or disadvantage.

The extra effort and cost to comply with the Act appears very small based on the Public Sector Commission guidance which directs the use of existing staff for this work [4].

The software and AI tools for tracking plain language and improving its use have advanced rapidly in recent years. The adoption of AI in government agencies is a key opportunity for prioritising plain language.

The value of improvements to communication likely outweighs the administrative burden. Successful efforts to improve plain language can result in savings to government by reducing the time and effort staff put into correcting mistakes [5].

Lowering communication barriers for New Zealanders experiencing systemic disadvantages has the potential to create long-term value. To the extent that it improves their experiences with government agencies and systems, and improves their wellbeing, it can reduce future costs to government and create benefits to society.

It is important to consider the voices of those who will be most affected when changing legislation. Disabled people and disability advocacy groups supported the Act becoming law [5].

Recommendation: We urge the Committee to recommend that the Plain Language Act Repeal Bill is withdrawn to recognise the barriers some people face when accessing government information and the very real impacts of poor and inaccessible communication.

Ngā Tohutoro | References

- [1] Grant Taylor (2025), Personal communication. Strategic Partner- Operations, Visionwest Community Trust.
- [2] Māori and Pacific bowel screening participation rates can be found on the Te Whatu Ora website. Access 12 May 2025. <https://www.tewhatauora.govt.nz/health-services-and-programmes/national-bowel-screening-programme/about>
- [3] <https://cps.gwu.edu/government-communications-study-reveals-critical-insights-building-public-trust>
- [4] <https://www.publicservice.govt.nz/guidance/plain-language-act-2022-guidance-for-agencies>
- [5] <https://www.stuff.co.nz/nz-news/360663004/law-aimed-removing-jargon-public-service-line-it-worth-saving>

Ko wai tātou | Who we are

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.

Through this membership, NZCCSS represents over 100 organisations providing a range of social support services across Aotearoa. Our mission is to call forth a just and compassionate society for Aotearoa, through our commitment to our faith and Te Tiriti o Waitangi.

Further details on NZCCSS can be found on our website - www.nzccss.org.nz.

Ingoa whakapā | Contact Name

Alicia Sudden ceo@nzccss.org.nz
Daniel Campbell