

Plain Language Bill

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New Zealand Council Of
Christian Social Services

Contact Name:	Nikki Hurst Rachel Mackay
Organisation Name:	New Zealand Council of Christian Social Services (NZCCSS)
Organisation description:	<p>The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Plain Language Bill.</p> <p>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.</p> <p>Through this membership, NZCCSS represents over 250 organisations providing a range of social support services across Aotearoa. We believe in working to achieve a just and compassionate society for all, 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.</p>

Tirohanga Whānui | Overview

We support the kaupapa to increase the accessibility to documents necessary for engagement with public agencies by virtue of plain language requirements. NZCCSS serves and represents membership throughout the community who must regularly support clients to engage with public agencies and the systems that allow access to them. Ensuring that the forms and information provided by governmental agencies is “clear, concise, and well-organised” will enable a greater level of access and a stronger sense of personal agency for the individuals engaging with them.

Our whakaaro matua are:

One

We applaud the inclusion of protections for Te Reo Māori and New Zealand sign language.

Two

We recommend the implementation on a timeline for review of agency documents to ensure accessibility of previously existing documents.

Three

We request clarification on the indicators and guidelines of “plain language”.

Taunakitanga | Recommendations

We raise the following points and recommendations for consideration:

One

We applaud and support the inclusion for protections for documents produced in Te Reo Māori and New Zealand Sign language from the same restrictions and requirements as those produced in English. The unique standing of these languages under Te Ture mō Te Reo Māori 2016/the Māori Language Act 2016 and the New Zealand Sign Language Act 2006 respectively deserve due protection and consideration. Should changes be made to the communication requirements for these languages this should be done with leadership from the communities that use them.

Recommendation Proposal 1: We support the separate communication requirements for documents in Te Reo Māori and New Zealand Sign Language.

Two

We request clarification on the indicators and guidelines of plain language that will be implemented across agencies. We note the Bill does not make specific reference to a system of ensuring that language of appropriate level and consistent execution is consistently applied across agencies. While provisions are made in Section 7 for the Commissioner to issue guidelines after consultation, this does not ensure that there will be consistent execution in standard and application across the various agencies. The Bill references the US Congress Plain Writing Act 2010 as basis for implementation, to which guidelines were published and public disseminated at the time of implementation to ensure compliance and consistency, but does not indicate that such a document will be implemented here.

Recommendation Proposal 2: We suggest the production and publication of an accompanying guide for relevant agencies to ensure consistent and appropriate application of plain language.

Three

We recommend the implementation of a timeline for review of agency documents to ensure accessibility of previously existing documents. We note that Section 6(2) holds these standards for plain language only for documents produced or revised after the Bill comes into effect. If documents that are already in existence and usage are not required to conform to these new plain language requirements in a timely manner, then this Bill is rendered ineffective for all situations in which these documents are currently being used.

Recommendation Proposal 3: We suggest requirements on the frequency of review for documents which fall under this Bill's scope.