



2nd March 2022

Submission on the Plain Language Bill

To the Governance and Administration Committee,

This submission is from the Public Health Association of New Zealand (PHANZ),
Kāhui Hauora Tūmatanui.

We do not need to appear before the committee to speak to our submission.

PHANZ can be contacted at PO Box 11-243, Manners Street, Wellington 6142,
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Signed,

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Submission

Thank you for the opportunity to write a submission on the Plain Language Bill.

The Public Health Association of New Zealand (PHANZ) is a national association with members from the public, private, and voluntary sectors. Our vision is 'Hauora mō te katoa – oranga mō te Ao' or 'Good health for all – health equity in Aotearoa'. We advocate for the health of all New Zealanders. To achieve this, we provide a forum for information and debate about public health in Aotearoa New Zealand. Our organisation includes a wide membership across New Zealand and has a Māori Caucus, a Pacific Caucus, and an Asian Caucus. Through these forums, our collective public health action aims to improve, promote, and protect the whole population's health through organised events, resources, and collaboration with stakeholder partners.

We recognise Te Tiriti o Waitangi as Aotearoa New Zealand's founding document, defining respectful relationships between tāngata whenua and tāngata Tiriti. We actively support the Tiriti o Waitangi articles in policy and legislation.

Overall we support the intent of the Plain Language Bill. If implemented effectively it will allow better access to information and services for all New Zealanders. Māori and Pacific adults are less privileged within the system of English language than non-Māori non-pacific adults^[OBJ:OBJ], and for many people in New Zealand English is not their only language^[OBJ:OBJ]. Plain language writing will ensure government forms, documents, and websites are more accessible and therefore more equitable for all.

To ensure the bill can be successfully implemented, we wish to make some recommendations and comments.

Recommendations:

Clause 4

Plain language is not sufficiently defined. In clause 4, plain language is defined as (a) the intended reader can easily understand after 1 reading; and (b) is clear, concise, and well-organised, and follows recognised guidelines of plain language writing. The current definition is ambiguous, therefore making it difficult to standardise and effectively implement. Specifically, the definition references a guideline that has not been provided. In the US Plain Writing Act of 2010, which this bill has been based upon, a comprehensive guideline document was supplied alongside the bill.

We recommend that the bill should supply the Plain Language guideline document and consider revising the definition of plain language.

Clause 6 Subsection (1).

States that plain language requirements will only apply to documents issued or revised after this Act comes into force. This will mean that there are potentially many documents that will not be revised, or not revised for some time. We appreciate that

revising all documents will create a greater workload for the Plain Language Officers but the purpose of this bill will less likely be realised until all documents are written to plain language standards.

We recommend that all practicable documents, both old and new, be reviewed and revised. We suggest that established documents that are frequently used be prioritised for review, and that a schedule is provided by which all documents will be eventually revised to plain language writing.

Comments:

- We strongly advocate for appropriate training and training resources for Plain Language Officers. The success of this bill will be determined by the effectiveness of Plain Language Officers to adopt a high standard of plain language writing. The skill of plain language writing should not be underestimated.
- We also note that those that opposed the legislation felt it would be a burden by adding unnecessary work. However, when implemented properly, plain language writing can improve efficiency by reducing errors and the need for staff to help (plainlanguage.gov).

References

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NZ, Stats. 2020. *2018 Census ethnic group summaries*. April. Accessed 03 14, 2022. <https://www.stats.govt.nz/tools/2018-census-ethnic-group-summaries>.

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