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New Zealand
Speech-language
Therapists' Association

*Te Kāhui Kaiwhakatikatika
Reo Kōrero o Aotearoa*

Submission on the Plain Language Act Repeal Bill

To: Select Committee

From: New Zealand Speech-language Therapists' Association (NZSTA)

Date: 9th May 2025

Introduction

The New Zealand Speech-language Therapists' Association (NZSTA) opposes repealing the Plain Language Act 2022.

Our members work to remove communication barriers every day. We know first-hand the real and measurable harm that arises when people do not understand the information that affects their lives. The Plain Language Act 2022 helps reduce those barriers and fosters equity, transparency, and trust in public services. Repealing the Act would send a damaging message that clarity and accessibility in public communication are no longer a priority.

Why NZSTA Opposes Repeal

- **Plain language supports equity**

The Act reduces barriers and helps ensure that people of all literacy levels, language backgrounds, and cognitive abilities can access and understand and engage with essential public information.

This is especially critical for Māori, Pasifika, and disabled people who already experience inequitable access to services and other communities where English is not a first language.

- **It aligns with Te Tiriti o Waitangi's responsibilities**

Te Tiriti affirms the right of Māori to participate fully in society. This includes access to public information in understandable, respectful, and culturally appropriate ways.

Plain language is a foundational tool for meaningful partnership, participation, and protection.

- **Good communication is not a ‘nice to have’—it is a public right**

The Code of Rights for consumers explicitly includes the right to effective communication (Right 5). This right ensures that consumers have access to information in a way they can understand, including the use of interpreters when needed. Section 14 of the The Bill of Rights Act 1990 states:

Freedom of expression

Everyone has the right to freedom of expression, including the freedom to seek, receive, and impart information and opinions of any kind in any form.

Receiving information in ways that everyone can understand is essential for all New Zealand citizens, and efforts to convey information in Plain Language support this.

The suggestion that plain language efforts are better handled without legislation risks deprioritising them altogether. In Aotearoa New Zealand, agencies have long been encouraged to use clear communication, yet in the absence of enforceable standards, implementation has been patchy. The New Zealand Productivity Commission (2021) noted that while transparency is a core public service value, “agencies often do not prioritise clear communication unless externally required to do so” (New Zealand Productivity Commission, 2021). Similarly, the Office of the Auditor-General (2015) found that unclear, overly technical language in public documents was a persistent barrier to community engagement — particularly for Māori — and concluded that more directive approaches were needed to ensure accessibility (Office of the Auditor-General, 2015).

Voluntary guidelines alone have not proven sufficient to address the persistent problem of inaccessible government communication. Although Te Kawa Mataaho | Public Service Commission provides guidance on plain language, there is no requirement for agencies to follow it, and uptake remains inconsistent (Te Kawa Mataaho, 2020). This is reflected in Write Limited’s assessments of public sector documents over nearly two decades, which show that many agencies do not meet plain language standards unless they adopt explicit policies or are externally evaluated (Write Limited, 2022). During the COVID-19 pandemic, a Ministry of Health evaluation highlighted inconsistent application of plain language across public communications — with material often unclear, especially for Māori and Pacific audiences (Ministry of Health, 2021). The Human Rights Commission has also noted that inaccessible language in public information is a barrier to equity for

disabled people and supported the Plain Language Act as a necessary mechanism to ensure accessible, inclusive communication across the public sector (Human Rights Commission, 2022).

References

Human Rights Commission. (2022). Submission on the Plain Language Bill. Retrieved from <https://www.hrc.co.nz>

Ministry of Health. (2021). Evaluation of the COVID-19 Health System Response – Final Report. Wellington: Ministry of Health.

New Zealand Productivity Commission. (2021). New Zealand’s Frontier Firms: Reaching for the frontier. Wellington.

Office of the Auditor-General. (2015). Principles for effectively co-governing natural resources. Wellington.

Te Kawa Mataaho | Public Service Commission. (2020). Guidance on Integrity and Conduct: Clear Communication. Wellington.

Write Limited. (2022). WriteMark Plus government document assessments: Summary report. Retrieved from <https://www.write.co.nz>

- **Clarity reduces costs and improves outcomes**

International and local evidence shows that plain language reduces misunderstanding, improves compliance, increases public satisfaction, and lowers long-term costs from errors or repeated contacts.

Effective communication is a cost saver, not a burden. Some exemplars:

- **Financial costs to individuals:** People may lose entitlements or miss deadlines because they didn’t understand what was required (e.g., benefit applications, visa processes, health appointments).
- **Administrative burden on agencies:** When forms, letters, or websites are unclear, public servants spend more time responding to confused clients or fixing errors. *For example*, Inland Revenue previously reported a significant drop in call centre enquiries after simplifying its letters—fewer confused taxpayers, fewer calls.
- **Healthcare risks and costs:** In healthcare, unclear information can lead to medication non-compliance, missed appointments, or misunderstanding treatment plans, all of which can increase demand for services.

- **Legal and social harm:** Poorly understood legal documents (e.g., tenancy agreements, court summons, school policies) can lead to unintentional breaches and negative outcomes, especially for people with lower literacy levels.

References:

Giacomin, A. K. R., da Silveira, R. Z., Costa, L., de Lima Baldam, R., & Júnior, T. D. P. C. (2024). Plain language in public organizations: a systematic literature review. *International Journal of Scientific Management and Tourism*, 10(5), e1113-e1113.

Peter, M., Maddocks, S., Tang, C., & Camp, P. G. (2024). Simplicity: using the power of plain language to encourage patient-centered communication. *Physical therapy*, 104(1), pzad103.

Warde, F., Papadakos, J., Papadakos, T., Rodin, D., Salhia, M., & Giuliani, M. (2018). Plain language communication as a priority competency for medical professionals in a globalized world. *Canadian Medical Education Journal*, 9(2), e52.

- **The Act set a minimal, structured framework for accountability**

The Act simply requires agencies to name responsible officials, report progress, and respond to public feedback. Removing this framework removes the incentive to improve.

Conclusion

NZSTA urges the Committee to retain the Plain Language Act 2022.

Clear public communication is not optional—it is essential to an inclusive and effective democracy. Repealing the Act would undermine efforts to build trust and accessibility in the public service.

We would welcome the opportunity to speak to this submission if hearings are held.

Ngā mihi nui,

Siobhan Molloy

Executive Director

New Zealand Speech-language Therapists' Association (NZSTA)