

2022-03/31-06

28 March 2022

Committee Secretariat
Governance and Administration Committee
Parliament Buildings
Wellington



Tēnā koe

Plain Language Bill

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the Plain Language Bill (*the Bill*).

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 55,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes for all Aotearoa New Zealanders through influencing health, employment, and social policy development.

Furthermore, we share the intent of the Ministry of Health's definition of equity which equally applies to NZNO work across professional, industrial and member activities.

NZNO supports the Plain Language Bill and its purpose to increase the clarity and accessibility of documents used for engagement with public agencies by virtue of their plain language requirements.

NZNO notes that indicators and guidelines for plain language have been referred to but, the Bill does not make specific reference to supporting an appropriate literacy level. Provisions are made in Section 7 for the Commissioner to issue guidelines after consultation but, this does not ensure that they will be appropriate or applied consistently across the various agencies.

Therefore, NZNO recommends the development and delivery of accompanying guidelines to ensure the consistent and appropriate application of plain language. Furthermore, we note that Section 6 (2) confirms standards for plain language only for documents produced or revised after the Bill comes into effect. If there are documents already in existence consideration should be given to updating these. If not, this Bill may be rendered ineffective for many situations which these documents are currently being used.

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There appears to be an unknown administrative burden looming for agencies. Furthermore, it is difficult to forecast the increase in workload and / or resources required to administer the legislation once enacted.

The Bill asks for compliance reports to be provided but it does not appear to have an enforcement mechanism to compel agencies to comply. The Bill also notes that the Commissioner must report *annually to the Minister on compliance by reporting agencies with Section 6*. What occurs post reporting to the Minister?

NZNO acknowledges the inclusion of protection mechanisms for documents in Te Reo Māori under Te Ture mō Te Reo Māori (2016), the Māori Language Act (2016) and New Zealand Sign Language under the New Zealand Sign Language Act (2006).

Please note that we do not wish to make an oral submission.

We thank you for the opportunity to provide feedback on the Plain Language Bill

Nāku noa nā

A handwritten signature in blue ink that reads "Lucia Bercinskas". The signature is written in a cursive style.

Lucia Bercinskas
Senior Policy Analyst