



**Access  
Easy English**

Access Easy English  
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31 October 2020

National Disability Strategy Governance and Engagement  
Department of Social Services  
Australian Government  
GPO Box 9820  
Canberra, ACT 2601

To the Committee,

Re: Submission to the next National Disability Strategy with particular reference to  
Accessible Information.

To provide a context for my submission the following information is provided:-

- I am a Speech Pathologist with 32 years' experience.
- I am an internationally recognised expert in the development and writing of Easy English which is the process of writing information for people with low and/or limited literacy;
- I have been developing and training Easy English for 17 years - the longest of any practitioner in Australia, and
- I developed the initial and following *Easy English Writing Style Guide* (2006,2008) and *Images for Easy English* (2007). These were the first written guidelines for Easy English. They were and continue to be based on Evidence Best Practice. I have subsequently developed a resource for the Victorian Government, *Easy English How to comply with the Victorian Government Accessible Communication Guidelines 2014*;

[www.accesseasyenglish.com.au](http://www.accesseasyenglish.com.au)

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- I continue to advertise the **only** 2 day training in Australia to organisations in the development and use of Easy English, including current research and international perspectives;
- I am currently the only preferred provider to the Australian Government for Easy English training;  
I am a preferred provider to the Federal Government for services in developing Easy English documents.
- I own and operate my own business, developing, training and building awareness of Easy English. I also provide specialist supports for people with Complex Communication Needs. My website is [www.accesseasyenglish.com.au](http://www.accesseasyenglish.com.au)

### **Introduction.**

Communication is a basic human right. It is named in the UNCRPD specifically discussing accessible communication in Articles 2, 9 and 21. However, no other Article of the UNCRDP can be implemented by all the different people with different disabilities unless you have functional and meaningful communication in your environment.

Communication needs to be included as part of universal design and access. It was not and does not appear to be separately identified as a strategic goal in the National Disability Strategy. Without a stated plan for implementing communication across all areas of need, or measurement of change data collection and outcomes can not be analysed.

Currently, communication is not a reported outcome for the National Disability Strategy, and this needs to change.

Some facts from Speech Pathology Australia<sup>1</sup>

- 'Children with autism, Down Syndrome, and Cerebral Palsy often begin their life with a communication impairment;
- 13,000 Australians use electronic communication aids to get their message across;
- Children with a language impairment are six times more likely to have a reading problem than children without;
- 14% of 15 year olds have only basic literacy skills'
- Three in every 1,000 newborns have hearing loss,.....higher in indigenous populations.'

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<sup>1</sup> Communication Impairment in Australia.

[https://www.speechpathologyaustralia.org.au/SPAweb/Resources\\_for\\_the\\_Public/](https://www.speechpathologyaustralia.org.au/SPAweb/Resources_for_the_Public/)

## Augmentative and Alternative Communication (AAC)<sup>2</sup>

- 'AAC is any type of communication strategy for people with a range of conditions who have significant difficulties speaking.'
- .... People who cannot speak encounter difficulties in getting information, building relationships, participating in education and employment and being safe. An AAC system is a way for people to communicate their needs, preferences and ideas.'
- 'Almost all domestic, social and learning activities involve some form of communication with other people – so it is important to find ways for the *person* to 'have a say' and 'understand' language in everyday situations. This involves more than having an AAC system and making time to communicate. It also involves others being willing to adapt activities so that the AAC user can take part.'

From Speech Pathology Australia: Augmentative and Alternative Communication (AAC)

## Australian Literacy data.

### Prose Literacy

The Australian adult literacy data which was derived from an international project between the OECD and 40 member countries highlights the significant numbers of Australian adults with limited or low literacy skills.<sup>3</sup> The research in 2013 was the third iteration of this data. It demonstrated that adult literacy skills had not changed across the previous 12-15 years in Australia. Plans are underway for the next version of this data in 2012-22. The data was for young adults from 16 years to 65 year old adults.

Participants in the study were placed in categories of 'below level 1' to 'level 5' based on their results of a wide range of day to day reading tasks.

The data indicates: -

- 44% of the adult Australian population do **not** have the literacy skills to manage a range of day to day reading tasks.
- 56% of the adult Australian population can manage a range a day to day reading tasks.

This data does **not** include rural and remote Aborigines, Torres Strait Islander people, or people in institutions, such as nursing homes, prisons or congregate care. Nor does it

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<sup>2</sup> Augmentative and Alternative Communication (AAC)

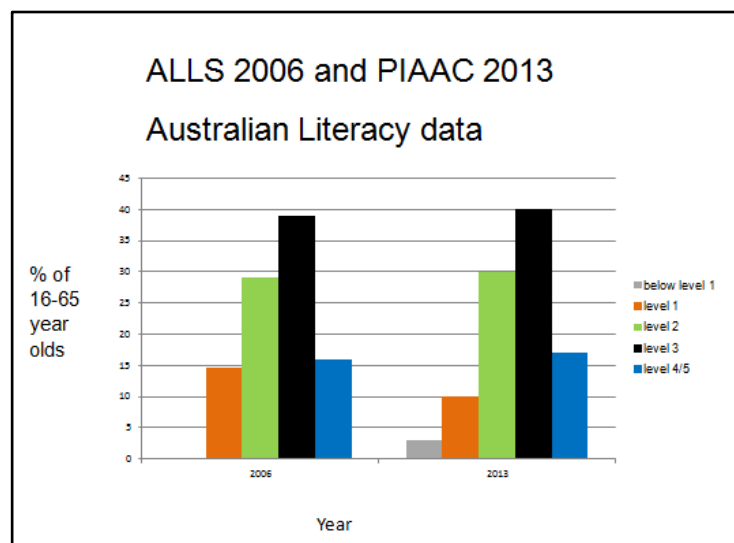
[https://www.speechpathologyaustralia.org.au/SPAweb/Resources\\_for\\_the\\_Public/](https://www.speechpathologyaustralia.org.au/SPAweb/Resources_for_the_Public/)

<sup>3</sup> Programme for the International assessment of Adult Literacy Skills. <http://www.oecd.org/skills/piaac/>

specifically include people with disability, including the Deaf community, people with an intellectual disability or an acquired disability.

The description of Proficiency of the data for Below Level 1 (grey) says

“Individuals at this level can read brief texts on familiar topics and locate a single piece of specific information identical in form to information in the question or directive. They are not required to understand the structure of sentences to paragraphs and only a basic vocabulary knowledge is required.”<sup>4</sup>



[www.abs.gov.au](http://www.abs.gov.au)

#4228

The development and access to Easy English is so more of the 44% of the adult Australian population may have access to meaningful written information they can read, understand and relate to. Many support staff are also not tertiary trained professionals, but more likely to be TAFE Certificate III or IV trained. These individuals are likely to be in the category of level 2 or may be less on the above data. Added to this are significant staff and families who have English as a second language. Subtract 10% from the numbers of adults who do have the literacy to manage a range of day to day reading tasks for this subgroup. Therefore suggesting 54% of these members of our population, and many staff who work in the disability sector do **not** have the literacy to manage a range of day to day reading tasks.

<sup>4</sup> <http://www.oecd.org/skills/piaac>, 2013 p67

## Numerical Literacy

Anything that includes numerical information, i.e. not just counting numbers, but knowing dates, distance, measurement, times and concepts such as before, after, less or more are less well developed than general prose literacy. From the above data also, for the general community this is at least 10% less well developed. Therefore 53% (63% for people with English as a second language) of the adult Australian population do **not** have the numerical literacy to manage a range of day to day reading tasks.

## Computer Literacy/Digital Literacy

This data is also from the above research. Further studies are from the Australian Media and Communications Authority (ACMA)<sup>5</sup> and CSIRO.<sup>6</sup> This data is critical to consider, as it is rare to have easily available hard copy documents from the government, non-government agencies, corporate and community sectors.

So, why is that important?

Firstly, the computer and use of the internet is based in literacy. Knowing that at least 44% of the adult Australian population do not have the literacy to manage a range of day to day reading tasks, this added element of using the internet makes this even more challenging for many people. You need to be able to know about the keyboard, and location of letters on the keyboard, to be able to spell or at least copy letters into the address menu when searching the internet. When you land on a website there are significant skills required to navigate and locate what you may be looking for. It is common to have no phone number readily available, instead a chat box or email is the primary means to access that service, which relies on literacy once again.

It may appear to professionals that computers, access and use of them and use of the internet is well developed through all our communities. This data demonstrates this is certainly not the case, and that the National Disability Strategy must address this in how information is disseminated.

The 2015 CSIRO investigation has the most recent data on use of the internet and computers in general Australian households. One in five households do **not** have access to

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<sup>5</sup> Australian Communication and Media Authority. ACMA (2016) Digital lives of Older Australians

<sup>6</sup> Campbell, S., Mason, C. M., Griffith, C., Dane, S. K., Reeson, A., O'Brien-McInally, B. A., Kimber, J. D. (2013) Broadband Impact and Challenges: Realising the benefits from the digital economy, Australian Centre for Broadband Innovation, CSIRO EP1312215.

computers. Where are these households likely to be? Low socio-economic groups, institutions, including community residential units (CRU) where many people with disability live, and other congregate care including nursing homes. In the work I do with clients providing Speech Pathology services it is rare to see a computer available to clients in their CRU. In private homes, there may be a computer available. However, it is rare for specific clients to be supported to access it meaningfully to locate and find information on the internet.

There is also strong evidence that households with older people do not have or access the internet. ACMA (2016). In the context of people with disability, the sector is ageing, but also many people are still supported at home by their elderly parents. They need as much access to information as the rest of the community.

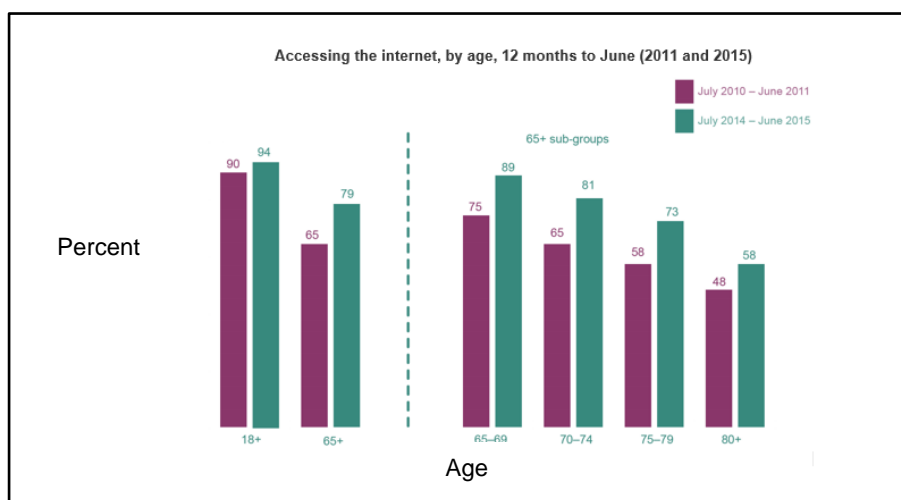
Use of the internet by the older population has improved in the last 5 years. But there are still significant numbers of older people who do **not** use the internet.

- One in ten people 65-69 years do **not** use the internet;
- One in five people 70-74 years do **not** use the internet;
- One in four people 75 – 79 years do **not** use the internet;
- Nearly two in five people 80+ do **not** use the internet.

Of those that do use the internet they use it for far fewer hours than younger people, and for fewer reasons.

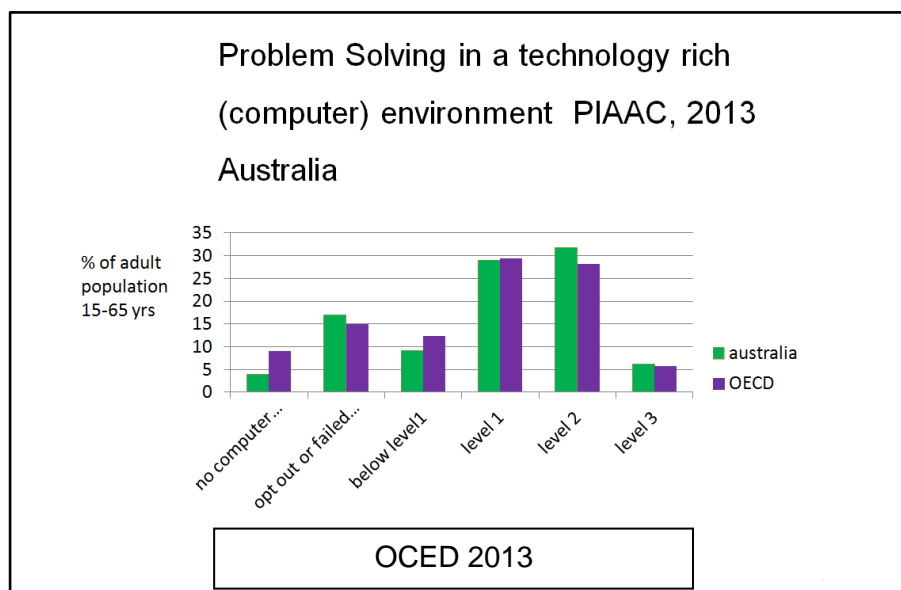
Only 15 % of older Australians use the internet to access government information.

Only 15 % of older Australian use the internet to access health information or services.



The PIAAC data investigated problem solving in a technology rich (computer) environment. In summary,

- 21% of participants opted out or were unable to complete the basic elements of using a computer, such as moving the mouse on the screen or opening a word document or browser. This is in-line with the CSIRO data;
- Another 9% at Below Level 1, were able to use only one generic feature of the computer to find out information;
- 29% at Level 1 in computer/ digital use could locate and problem solve basic information, only being able to use widely available and familiar technology applications, such as e-mail software or a web browser. It required a minimal number of operations to find the information needed;
- That leaves only 38% who were able to interact at Level 2 or Level 3, meaning they could use the internet to explore one or two websites (level 2) or multiple websites and additional applications (Level 3) to read and problem solve to get an answer. Note: there are no higher levels registered.



## Accessible Information.

### What's in a name? Easy English, Easy Read. Does it matter?

Easy English and Easy Read are written strategies which simplify written content incorporating 'easy to read' techniques such as 'use everyday words, short sentences, simple grammar, remove technical and complex words, etc with specific layout and supported with images. Best practice also includes consumer review with the intended audience.

You may hear that some accessible information practitioners indicate something can be called Easy Read or Easy English, i.e. the label does not matter – it is all the same.

My investigations and analysis in this space indicates this is **not** the situation. Some basic elements that can be seen on a surface analysis show:

- Headings
  - Easy English – supports headings and subheadings with an image;
  - Easy Read – do **not** use images for heading or subheadings;
- White space
  - Easy English – uncluttered so uses lots of white space around images to clearly distinguish them, and the text they support;
  - Easy Read – little white space and many images to a page;
- Margins
  - Easy English – consistently the same across a document at 4.5 or 5 cm wide;
  - Easy Read – up to 3 different margins used in a document. The text may start at 0 cm, with some text at 2 – 3 cm and further text at a wider margin;
- Images
  - Easy English – clear, specific and concrete. They have no distracting elements in them. Images are on the left with mostly 4 images down the page;
  - Easy Read – can be general or have lots of distracting detail in them. Images are on the left, with mostly 6-8 images or more down the page.

Some specific language analysis identify:-

- Sentence length
  - Easy English – has 5 - 8 word sentences;
  - Easy Read – has 9 -12 word sentences;



- Average morphemes across documents
  - Easy English 8.3 morphemes;
  - Easy Read 12.7 morphemes;
- Number of different words in a document
  - Easy English – 36 % of different words. Requires a smaller vocabulary to read;
  - Easy Read – 42% of different words. Requires a greater vocabulary to read it;
- The use of ‘if...then’ construction
  - Easy English – only 3 occurrences across the 5 analysed documents;
  - Easy Read – 18 occurrences across the same number of documents (5).

All these elements together make Easy Read a significantly more complex document to read, understand and know what to do with the information.

A recent Australian posted suggested Easy Read is an equivalent to a grade 5 reading level. This has been confirmed with my own analysis using the Flesch-Kincaid Grade Level,<sup>7</sup> with Australian Easy Read having a range from grade 3 to year 10 levels. Easy English content has been analysed showing an average of a grade 2 reading level, with a range from grade 0 to grade 3. This is significantly different.

Recent published research from Buell (2019)<sup>8</sup> indicates a number of issues with the comprehension of Easy Read. Although consumers may say they prefer Easy Read to a Plain Language or more complex document, they do not appear to gain the requisite understanding of it, whether that is with or without support to read the document. None of the consumers had seen or engaged with Easy English in this research. In other words, Easy Read, had been, and continues to be the only so-called simplified content available to many adults with limited literacy skills. Therefore, the comments many say, of ‘they want more Easy Read.’ As in earlier research Rodgers & Namaganda (2005)<sup>9</sup> heard from consumers, ‘this is better than what we had before.’ When you know no difference, you accept what seems to be the best available.

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<sup>7</sup> Flesch-Kincaid Grade Level <https://bit.ly/3aoJvY5>

<sup>8</sup> Buell (2019) An open randomized controlled trial of the effects of linguistic simplification and mediation on the comprehension of “easy read” text by people with intellectual disabilities. *J Appl Res Intellect Disability*. 2019;00:1–13.

<sup>9</sup> Rodgers, J, Namaganda, S. (2005) Making information easier for people with learning disabilities. *Brit J Learning Disabilities*. 33, 52-58.

Buell's (2019) research assessed the complexity of the Easy Read using the Flesch-Kincaid Grade Level. Although there is significant debate about its use, it is the only measure we have available and as a 'compare like with like' does provide useful information. In her research Buell indicated there was a great range of different Easy Read, developed at what appeared to be different linguist levels and demands for readers. This observation has also been seen in many Australian developed Easy Read. (personal citation, 2011 - 2020)

The documents ranged from a grade 2 level to a grade 14 reading level (University reading). Buell's research used the lower end and higher end Flesch-Kincaid Grade Level Easy Read documents to conduct her research. Her conclusions included the persons vocabulary knowledge had a greater bearing on the persons understanding than any other element such as grade level of the document or own assessed reading age.

These are some recent examples of quality evidence based best practise Easy English, I have been involved in developing in the last 6 months.

- **Bumpy Road:**<sup>10</sup> A set of 31 fact sheets developed with and for parents with intellectual disability. It includes an Easy English website interface, a critical element in considering how COVID19 information has been disseminated to the public in Australia, including people with disability.
- **UN Convention on the Rights of Person with a Disability.**<sup>11</sup> Developed with Women with Disabilities Australia. 1 of 4 documents in their Human Rights toolkit.
- **Sex and the law:**<sup>12</sup> Developed with Women with Disabilities Australia.
- **Victorian Electoral Commission (VEC):**<sup>13</sup> Access and Inclusion Strategy 2019 – 2023

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<sup>10</sup> [www.bumpyroad.org.au](http://www.bumpyroad.org.au)

<sup>11</sup> <https://bit.ly/2XUShle>

<sup>12</sup> <https://bit.ly/3kCqaYk>

<sup>13</sup> <https://bit.ly/33Z11kn>

## **Comments for consideration for the next National Disability Strategy.**

### **1. Do you have any comments on the vision and outcome areas being proposed for the new National Disability Strategy?**

The broader community needs to be made more aware of the JobAccess program that can provide supports when employing people with disability.

### **2. What do you think about the guiding principles proposed here?**

Engagement continues to be provided to those that can engage with the materials provided in plain or complex language. This request for submissions is in Auslan, other languages in plain language and Easy Read. None of this is common practice. It also assumes access proficient digital literacy and access to technology.

Many people with disability have low incomes which is an enormous barrier to access to the digital economy on top of limited literacy skills, as noted above in the discussion. In a technology environment this is closer to 70% of people who do not have these skills.

Government and non government agencies continue to provide Easy Read, which at best is only relevant to people functioning at a grade 5 or above equivalent reading level. Many self advocates may say this is enough. However, it is not. Australia is the leading country in the development of Easy English. It is simpler and easier to read, understand and use than Easy Read. Availability of EBP Easy English will enable those people who are never heard, to participate in the NDS and their community more meaningfully. The strategy needs to reinforce the use of EBP and provide Easy English.

Universal design still leaves anyone who does not have functional communication or functional reading behind. Communication (in its myriad of forms) needs to be specifically named in the next National Disability Strategy, to be able to have goals outlined, outcome measures identified and data collected on changes in this critical sphere of engagement and inclusion.

People with communication and literacy difficulties are also a marginalised population. They have great difficulty to have a voice, or having any voice heard. Besides the persons skills in communication and literacy, it does require the communication environment to take responsibility for enabling the environment and communication partner to modify what and how they communicate. Eg: consider background noise, time in the conversation to have a turn, written information in a way the person can read, understand and know what to do with.

Accessing the services and supports for the support network of the person with a disability requires high level skills and abilities. This process needs to be simpler and less bureaucratic for the wide breadth of people who need to access it.

**7. What do you think of the proposal to have Targeted Action Plans that focus on making improvements in specific areas within a defined period of time (for example within one, two or three years)?**

Change in the sector requires significant input. Targeted Action Plans certainly have a place. However, what and how are these targets to be prioritised. While communication is not a measurable outcome on the plan, these people are left out of all discussions. They need to be engaged using Easy English (not Easy Read) for those with limited literacy, and specific supports and meetings for people who use Augmentative and Alternative Communication.

For both of these groups something as simple as further time in a meeting, or further time to respond to submissions that have been written can and does make a significant difference.

**8. How could the proposed Engagement Plan ensure people with disability, and the disability community, are involved in delivering and monitoring the next Strategy?**

As with the above statement, Easy English (not Easy Read) must be provided to people with low literacy skills. It also needs to be available in other means than just via websites, and social media. Local networking and face to face

engagement is essential. These people also need further time to engage with the information and develop a response that is meaningfully for them.

### **Recommendations**

1. The needs of the 44% of the adult Australian population who do not have the literacy to manage a range of day to day reading tasks needs to be addressed by providing EBP Easy English in all work developed for and in the National Disability Strategy. Repeatable and measurable outcomes need to be included.

It must also include a strategy for looking beyond website and social media for engaging with this population.

2. The needs of people with communication difficulties and specifically those who use Augmentative and Alternative Communication must be included as a specific goal in the upcoming National Disability Strategy.

I would be pleased to meet with the committee to explore this further, and ensure the disability community that is rarely heard is more able to be engaged in the next strategy.

*Cathy Basterfield*

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