ABN 26 606 627 502

14 January, 2022

Disability Employment Reform Branch
Department of Social Services
GPO Box 9820
Canberra ACT 2601.
c/- DESConsultation@dss.gov.au

To the Chair and Committee for the Consultation on a New Disability Employment Model.

Re: A New Disability Employment Model and access to clear meaningful written information, with a particular reference to people with low literacy.

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

- I am a Speech Pathologist with 34 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 creating and training others on Easy English for 18.5 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 in Australia and internationally. They were and continue to be based on Evidence Based 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;*

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- I continue to provide the **only** 2 day Easy English 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;
- During 2021, I trained a team (12) from Department of Social Services on how to write Easy English which was very positively received;
- I am a preferred provider to the Federal Government for services in developing Easy English documents;
- I have received no requests for quotes or tenders to develop Easy English from any Federal Government department or agency;
- I own and operate my own business, developing, training and building awareness of Easy English, employing 4 staff. My website is www.accesseasyenglish.com.au

On December 20, 2021, we were announced as a finalist in the Victorian Chamber of Commerce and Industry Community Awards, 2021. It is for the more than 120 fact sheets and posters COVID19 Easy English fact sheets and posters we developed for the community. The winners are announced in February, 2022. https://www.victorianchamber.com.au/news/finalists-announced-for-victorian-covidsafe-business-awards

My submission addresses
- A) Australian literacy data and impact for marginalised communities;
- B) Materials available for people with low literacy for workplaces, including this consultation paper.

Appendix 1 - Access Easy English projects with the Australian Government.

Appendix 2 - Some other recent Access Easy English projects, including pro bono COVID19 Easy English development from page 25.

A. Australia literacy Data

Reading to know what to do, should never be a reading test of ones' literacy.

Consider the Easy Read Consultation Paper[1] for this public consultation, and it being the only accessible written content available. On a basic analysis this Easy Read Consultation Paper is more than 50 pages long, and tells the reader. 'This paper is very long. You don't have to read it all at once.'[2] And 'It might take you about 1 – 2 hours to finish reading this paper.'[3]

Linguistically, using the Flesch-Kincaid reading scale, its reading grade equivalence is grade 6.8 years. (Final year primary school), with only a 68% reading ease. It includes 2,631 words, with sentences on average 12.5 words long.

Firstly, the length and time warning are going to negatively impact anyone who had thought to read this Consultation Paper, let alone people with low literacy. The linguistic analysis demonstrates it has been written for a reader of plain language, rather than for people with low literacy, which is what accessible written information is meant for.

In 2021,[4] of the approximately 16.5 million Australian adults (16- 65 years, **not** including rural and remote Aboriginal and Torres Strait Islander people, **nor** people in institutions where many people with disability live), 7.3 million (44%)[5] [6] of them did **not** have the literacy to manage a range of day to day reading tasks. It includes tasks such as understanding workplace directions, pay slips and leave entitlements, website instructions and safety fact sheets and the ever-changing pandemic health directions.

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[1] DSS. (2021) A new disability employment support program We want to know what you think. An Easy Read paper. https://engage.dss.gov.au/wp-content/uploads/2021/11/Easy-Read-Guide-New-Disability-Employment-Support-Model-Consultation-Paper.pdf

[2] Ibid page 3

[3] Ibid page 4

[4] World Bank data 15-64 years. Nov 2021 https://data.worldbank.org/indicator/SP.POP.1564.TO?end=2020&locations=AU&start=1960&view=chart

[5] Organisation for Economic Co-operation and Development (OECD) (2013 -2019) Programme for the International assessment of Adult Literacy Skills.(PIAAC) http://www.oecd.org/skills/piaac/

[6] Australian Bureau of Statistics. #4228. Programme for the International assessment of Adult Literacy Skills www.abs.gov.au

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Nor would most of these 7.3. million adults have the skills to read, understand and respond effectively to your DSS Easy Read Consultation Paper.[7]

When it is about numbers and numerical concepts the percent of people who have difficulty rises approximately 10 percent, so 8.3 million Australian adults.[8] For adults with English as a second language it also separately rises approximately 10 percent.[9]

The percent of people who are challenged by their literacy increases in times of stress and anxiety as well as reading new information such as we have all experienced during the COVID19 pandemic. It can also vary from day to day, depending on these additional factors and how stressed or anxious or unwell we may feel at a given time.

The screening of the SBS documentary 'Lost For Words' (2021)[10] showcases the very real issues of low literacy for so many people in their everyday lives. Firstly, each person looks like 'the person in the street.' They do not wander around our community with a label on their head, nor do they necessarily identify as a person with a disability. The documentary showed contemporary examples of difficulties in managing things such as reading a bus timetable to get to class, a meeting or other places; reading a menu to purchase a drink; obtaining a Learner's Driver Licence, reading to their children and writing an email. Their anxiety, self-esteem and confidence also impact on their ability to read and understand written language.

An article by Dana Daniel in The Age[11] and Sydney Morning Herald (15 November 2021) also highlight these significant issues. The author reinforces the need for simple and straight forward content available in easy to find ways.

A report from The Australian Industry Group (AI Group), 2018 highlights that '99 per cent of employers are affected in some way by low levels of literacy and numeracy in

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[7] DSS (2021)

[8] OECD (2013- 2019)

[9] OECD (2013- 2019)

[10] SBS Documentary Lost for words (2021) https://www.sbs.com.au/ondemand/program/lost-for-words

[11] Dana Daniel (2021) Literacy hotline hit with calls about 'confusing' vaccine information in The Age and Sydney Morning Herald (15 November 21)https://www.theage.com.au/politics/federal/literacy-hotline-hit-with-calls-about-confusing-vaccine-information-20211112-p598jm.html

their workforce. They are dissatisfied with the basic numeracy and literacy levels of over one-fifth of school leaver entrants.'[12]

Computer Literacy and Digital Literacy
Digital Inclusion

Firstly, the computer and use of the internet and government websites 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 at least these people.

The OECD data also identifies just over one third of Australian adults **only** have effective digital literacy beyond a basic level of navigation.[13] Another 30% can manage a website when there is a simple navigation of only one or two steps. This also assumes the content is written in an easy-to-read way they can read and understand. One in five people did **not** have access to a computer or have the basic skills to open a browser or word document. This has not changed in the following years.

The Australian Digital Inclusion Index (ADII) 2020[14] (18 years +) includes critical data that

- 2.5 million did **not** have access to the internet;
- 4 million **only** have access to mobile phones. (correlating with poor data options)

The ADII 2021[15] data released in October 2021 does not include data from the Northern Territory or Aboriginal and Torres Strait Islander people. It does however show during the previous 18 months of the pandemic, that people who already had good or high digital inclusion before the pandemic are even more highly included than before.

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[12] The Australian Industry Group (2018) Survey Report - Workforce Development Needs Skilling: A National Imperative. Page 3. https://cdn.aigroup.com.au/Reports/2018/Survey_Report_WFDNeeds_Skilling_Sept2018.pdf

[13] OECD (2013 -2019) PIAAC http://www.oecd.org/skills/piaac/

[14] Australian Digital Inclusion Index (2020) Measuring Australia's Digital Divide. https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/06/TLS_ADII_Report-2020_WebU.pdf

[15] Australian Digital Inclusion Index (2021) Measuring Australia's Digital Divide. https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/10/ADII_2021_Summary-report_V1.pdf

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In contrast those with low digital inclusion have not shown such growth. In fact, the gap between these two groups is wider now, than the previous 18 months. The only group that suggests some increased digital inclusion were parents of school age children where they specifically had to assist their children with online learning, and it is only for this task.

It must be noted digital inclusion is not just about having the hardware and internet access. It is knowing how to use the technology meaningfully to do what you want to do.

The AI Group report[16] with regard to digital and computer skill needs and skill development states 'managers are the largest priority (33%), followed by technicians and trades workers and administration staff (both 18%). Professionals were rated next at 16 per cent.'

Key characteristics – low literacy

Some key characteristics of people who do **not** have the literacy to manage a range of day to day reading tasks

- Do **not** see themselves as readers;
- Spend little or no time in the act of reading;
- Rarely if ever open any text message, magazine, book, website, letter;
- Have low self-esteem about their reading;
- Often have low confidence in trying to use any literacy they may have;
- Are overwhelmed with lots of text on a page;
- Have a vocabulary that is more limited, and related more to their everyday conversation;
- Do not have the practice of taking those funny black marks from the page (letters and words), interpreting them meaningfully and then knowing what to do with it compared with a person who sees themselves as a reader.

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[16] AI Group report 2018. Page 25

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Further key characteristics

They are also more likely to have some or all these characteristics:
- Household income Q5 (under $35k);
- Aged 65 +;
- Less than secondary education;
- English as a second language;
- Disability;
- Household income Q4 ($35K- $60K);
- Not in labour force;
- Aboriginal and Torres Strait Islander.

Key characteristics – low digital literacy

Some key characteristics of people who do **not** have the digital literacy to manage a range of day-to-day digital literacy tasks. For many this is in conjunction with their low literacy skills.

- Do not see themselves as being digital literate;
- Are unable to self-manage basic errors in using their computer;
- Struggle with new Apps or software. Would prefer to stay with known ones;
- May use only basic word functions, not access Excel, PowerPoint, internet or intranet;
- Have slow key boarding skills to type and do not use any or many keyboard shortcuts;
- Poor mouse awareness and control;
- Poor use of scanning a webpage or document to search for applicable content;
- Anxiety when trying new things, or opening weblinks;
- Anxiety they will break something.

Appendix 3. Further data and details on prose literacy, numerical literacy and digital literacy in the adult Australian population.

In summary

This data clearly identifies this is a critical issue for more than just a few vulnerable people.

When you consider all the data regarding the concerning levels of literacy and digital literacy in the community, the Federal Government must acknowledge and account for the whole community when developing policies and practise in the workforce for full inclusion.

There needs to be clear polices for all workplaces to better plan for and have available clear, simple accessible content in all workplaces. All content must be available in Easy English.

B. Materials available for people with low literacy provided by the Federal Government

The *United Nations Convention on the Rights of People with a Disability (2006)* must be considered in the Federal Government response in writing information for the public.

> **Article 9,** *Accessibility*, and
>
> ***Article 21**, Freedom of Expression, Opinion and access to information both recognise the importance of access to information the person needs, in the way the person understands, in the way they can use it meaningfully, in the same timeframe as the rest of the community.*

Article 21 is similar to the Universal Declaration of Human Rights, Article 19.
Australia is a signatory to both these conventions.

Good quality accessible information must be a compulsory part of the suite of publications available to the public from the Federal Government at all times. During the pandemic it is even more critical. It must also be available in print for the large proportion of the population who have low or no digital literacy and/or have a low digital inclusion index score.

This submission is specifically discussing content written for people with low literacy. under the broader umbrella of Accessible Information. Easy Read and Easy English are the two types of written content in Australia. Analysis since the introduction of this specific type

of Accessible Information in Australia has time and again demonstrated that Easy English is the simplest, least complex way to write content for people with low literacy.

Easy English has a reading equivalence age range using the Flesch-Kincaid Reading Equivalence Scale of Grade prep to Grade 3. The average is Grade 2.

Australian Easy Read has a reading equivalence age range using the Flesch-Kincaid Reading Equivalence Scale of Grade 3 to Year 10. The average is Grade 5.

Appendix 4
An overview of the significant differences between Easy English and Easy Read.

This DSS call for submissions in Easy Read is just one example of content developed which is not useful to many people the government need to communicate with. Firstly, it states it is more than 50 pages long.

A skilled developer of Easy English would not start with this presumption. Content needs to be broken up into meaningful chunks of manageable content.[17] As with the Easy English example developed for the Department of Transport and Infrastructure (See Appendix 1) a more robust plan to consider how someone is going to work through the content is required. The Easy English example was broken into 2 separate documents: the discussion/issues (1) and questions to consider//what do you think (2).

Easy Read continues to use complex words, and has complex explanations of these words at the end of the long document.[18] There is no specific reference to the glossary once the complex word first appears. This use of complex words with a glossary is not required when development is done in Easy English. (see any example in Appendix 2).

Easy Read is not good enough. It is too complex. Additionally, many people do **not** and can **not** locate content on websites. It is not unusual to need to navigate through 5 or 6 layers to find the content you need. The search function tags, are not intuitive, reducing how content can be located.

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[17] https://engage.dss.gov.au/wp-content/uploads/2021/11/Easy-Read-Guide-New-Disability-Employment-Support-Model-Consultation-Paper.pdf page 3

[18] Ibid page 2. Example on page 16 – turn to page 50.

Our work developing Easy English suggests those with low digital literacy or low digital inclusion indexes would suggest printed material does need to be available in all workplaces.

A side note.

 At no time has any request for tender been made to the Communications Panel (either as an invitation only or open tender) for services on Easy English (or Easy Read). All work has been directed to one service only. Upon querying this, I was informed the provider has done work before for the Federal Government, and we know they can meet deadlines. This is not, nor should ever be the only reason why a contract for government work is offered to only one company, when the basis of the Communication's Panel is all providers are offered equal opportunity to quote for government contracts. Doubly concerning is the Easy Read is not fit for purpose.

In Summary

The Federal Government only commission some Easy Read. It does **not** meet the needs of the large community of people with low literacy.

Easy English must be the policy for accessible written content recommended to the broader workforce. The Federal Government must commission it as part of their own workforce information, but also in consulting with the public.

Many people in the workforce, and likely almost every person with a disability in supported employment would not be able to effectively use Easy Read.

Summary of submission

Knowing that 44% of the adult Australian population do **not** have the literacy to manage a range of day to day reading tasks, resourcing needs to be given over to the development of current evidence based best practise Easy English. It is on average written at a reading equivalence level of grade 2.

As discussed in this submission, the Federal Government release some information in Easy Read; this is not simple enough for far more people with limited literacy. It is on average at a reading equivalence level of grade 5. However much of it requires much higher, more

developed literacy skills. The images selected in the Easy Read are specifically of people with intellectual disability. Many other people in the general community who value easy to read content are not going to engage with Easy Read, as they do not see themselves represented in the images.

Governments must provide printed copies of content. It should not be left to a small request on a website page that is difficult to locate to request this.

There are enormous amounts of information not available to people with low literacy. Most of the content is about broader issues, rather than the day to day needs of people with low literacy in their workplace. Where is the information on employment subsidies, or workplace safety, how to apply for a job, mentoring for a job, and the Job Access programs. Updates, such as change of dates for this submission are not available for people with low literacy.

It is a reality that the internet and websites are in our community. Federal government websites with information for employees and employers need to be redesigned so those who do have some limited digital literacy skills, may be able find any content in Easy English. It is possible to rethink the navigation and complexity of websites to make them user friendly to this community.

The government needs to commission current evidence based best practice and effective Easy English Accessible Information for all our community.

Recommendations

1. The Federal Government must
    a) review what it is commissioning in accessible written content for people with low literacy, including whether it is best practice and meeting the needs of the all the people who they need to communicate with and consult with;
    b) develop policies that outline specific requirements for people with low literacy in all workplaces, including supports for people with low literacy who also have disability. Every workplace is likely to have some people with low literacy needs;
    c) develop policies on where workplace information is available. Printed information must be an option available to the workforce;

d) plan all workplace based information on government websites must be in easy-to-read language and easy to navigate

e) develop policies for all government departments and agencies to have simple to navigate websites and intranets that include content in Easy English.

I would be pleased to discuss these issues with the Chair and Committee.

Cathy Basterfield

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Links to current training opportunities.
2 day Learn to write Easy English. Next available
1 & 3 March 2022. https://bit.ly/3d8UGq2
6 & 8 April, 2022. https://bit.ly/3noz3aK
30 May & 1 June, 2022 https://bit.ly/3FEgztn
Approximately every 6 weeks. Or requet your own training for your wrokplace.

A series of 2 hour Webinars https://bit.ly/3nMsvmx
1. Easy English and Computer Literacy, 20 June, 2022
2. Easy English and Health Literacy, 22 June, 2022
3. Easy English and Legal Literacy, 27 June, 2022
4. Easy English and Financial Literacy, 29 21 June, 2022.

Easy Englsih, Easy Read for Speech Patholgoists 5 July, 2022.

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