



Access Easy English

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To the Disability Employment Centre of Excellence Options paper consultation

This submission addresses

- one of the key areas noted in the Options paper, 'Provide accessible information and resources' as outlined on page 4 of the Establishing a Disability Employment Centre of Excellence, Options Paper, 2023
 - communication in the workforce
- and**
- response to your questions.

To provide a context for my comments the following information is provided, I am

- a speech pathologist with more than 35 years' experience working with people with multiple and complex communication needs, and in particular people with moderate and severe intellectual disability. This includes people who use other means to communicate instead of speech or to augment their speech
- the internationally recognised expert in the development and writing of Easy English which is the creation of written information for people with low and/or limited literacy.

Furthermore

- I developed and wrote 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 provided the Victorian Government with their guide, Easy English How to comply with the Victorian Government Accessible Communication Guidelines 2014. This guide is on their intranet
- Current best practice Easy English development has built on that initial work and is guided by the latest available research
- I have been developing and training Easy English for 18 years - the longest of any practitioner in Australia, and
- I continue to advertise 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. We receive registrations from all states and territories in Australia and from international participants.

Access Easy English, the business I run,

- is on the Federal Government DHS Procurement Panel for Easy English services
And
- is the **only** provider of Federal Government Easy English training services
- is on the newly created NDIS Accessible Communications Panel for Easy English services.
- is currently the only preferred provider of Easy English services to a number of state governments.

In 2022 my team were acknowledged both nationally and internationally for our work and our long term commitment to and the current development of best practice and quality Easy English with the following awards. Note the National Award for the NDIS sector.

- **International Zero Project Shortlist 2023**
- **International Global Award 2022**
Most Outstanding Communicator for people with Disability
- **Australian National Enablement Award 2022**
Most Outstanding Communicator in the NDIS Sector
- **APAC Insider Small Business Award 2022**
Easy English training

- **Victorian Chamber of Commerce and Industry (VCCI) – COVIDSafe Business Community Award Finalist 2022.** For our pro bono COVID19 content development.

In 2023 I presented at the United Nations in Vienna, Austria on Easy English and universal access for all people with low literacy.

I have been invited to present Keynote Plenaries in 2023 at

- KLAARA – International Easy to Read Conference – ‘Development of plain language & easy to read text. Two different audiences.’ Portugal, July 2023
- Universal Design for Higher Education International Conference The need for universal design: Implications of student literacy in higher education. Virtual October, 2023
And
- East Asia Society of Augmentative and Alternative Communication (KSAAC) Conference. ‘Easy to read information, Social Stories™, AAC. Same or Different? South Korea, January 2024.

Speech Pathology Australia, my professional association, also recognise our Easy English work as leading the awareness, development and best practice of Easy English.

Recognising this, Easy English (**not** Easy Read) is specifically named in the *Speech Pathology 2030 - making futures happen* report, which has informed the previous, current and will inform the next strategic plan of the association.

It includes Communication accessible communities (1) and Skilled and confident families and carers (5), which specifically includes Easy English as being part of positive and meaningful engagement for all families. ¹

The *Professional Standards for Speech Pathologists in Australia*² also identifies to ‘Maintain high standards of communication, information sharing and record keeping’ (1.5.) we use

¹ Speech Pathology Australia. (2016). *Speech Pathology 2030 - making futures happen*. Melbourne. https://www.speechpathologyaustralia.org.au/SPAweb/whats_on/Speech_Pathology_2030/SPAweb/What_s_On/SP2030/Speech_Pathology_2030.aspx?hkey=3fad1937-a20e-4411-8b46-369f61570456

² Professional Standards for Speech Pathologists in Australia (2020) https://www.speechpathologyaustralia.org.au/SPAweb/Resources_for_Speech_Pathologists/CBOS/Professional_Standards.aspx

accurate, accessible communication to respond to the needs of individuals and communities in all circumstances, which includes 'informed consent' (1.1).

Speech Pathologists are the only professionals who include in their scope of practice assessment and intervention for people with communication disabilities and difficulties. This is across the lifespan and across all settings a person may engage in, including their workplace or training for work environment.

Our professional standards also recognise the importance of Article 19 of the Universal Declaration of Human Rights³ and Article 21 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).⁴ Both these Articles state individuals have the right to access information in the way they can understand, to take part and to make meaningful choices. It also states it needs to be at the same time as other content is available to the public, and the person who needs it can locate it.

³ United Nations (1948) Universal Declaration of Human Rights <https://www.un.org/en/about-us/universaldeclaration-of-human-rights>

⁴ United Nations. (2006). Convention on the Rights of Persons with Disabilities (UNCRPD). <https://www.un.org/development/desa/disabilities/convention-on-the-rightsof-persons-with-disabilities/convention-on-the-rights-ofpersons-with-disabilities-2.html>

Communication

Issues

The 2018 *Workforce Development Needs: Survey Report*⁵ states employers recognise some of the most critical and missing staff skills required in jobs are

- effective communication skills
- written literacy skills.

Unfortunately for most employers they report these are often very poor, and not up to a standard for use in a business environment. This data does **not** mention or appear to include any people with communication disabilities.

In 2015, 1.2 million Australians reported some level of communication disability.⁶ The vast majority, 72% of this cohort, of people with a communication disability are not currently in the workforce. These people may or may not have an intellectual disability. For many it can be an invisible disability, until they begin to communicate or when a communication partner sees the person does not understand the conversation and/or has memory problems, difficulty solving problems, sequencing or creating a logical method for a task.

Considerations to plan for

This [page](#) on the new website, The Communication Hub, created by Speech Pathology Australia⁷ and AGOSCI⁸ (Peak body for people with complex communication needs) outlines many of the different communication difficulties or disabilities a person may have.

People with communication disabilities need to have their own personalised communication system to best meet their current and future needs. Speech pathologists work with individuals, their families and network to determine what works best for them. This is likely to change over time.

There are also many different barriers to effective communication for people who do have communication difficulties or disabilities. This can be environmental or communication

⁵ AI Group (2018) Workforce Development Needs: Survey Report

https://cdn.aigroup.com.au/Reports/2018/Survey_Report_WFDNeeds_Skilling_Sept2018.pdf

⁶ A Profile of People with Communication Disability in Australia

<https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4430.0Main+Features982015?OpenDocument>

⁷ Speech Pathology Australia <https://www.speechpathologyaustralia.org.au/>

⁸ AGOSCI Inc. <https://www.agosci.org.au/>

partner issues. This [webpage](#) on the above website, begins to explore some of these barriers, including being respectful, providing dignity and time to communicate and communication partners be willing to use an augmentative or alternative means of communicating, such as Key Word Sign⁹ for people with intellectual disability or a communication board recommended by an appropriately qualified speech pathologist.

Depending on an individual's specific communication needs, Speech Pathologists may work with Occupational Therapists, Physiotherapists or Rehabilitation Engineers to support good access to the equipment the person/employee needs at work.

Recommendations

To include in the employment hub highly experienced Speech Pathologist consultants to work with employees and employers to

- provide expertise to the employee to enhance their communication skills at work
- provide training and advise to employers on how to reduce the barriers and improve the environment for effective communication in the workplace
- to support research for effective communication tools and training in the workplace.

⁹ Key Word Sign Australia <https://kwsa.org.au/>

General Literacy & Numerical Literacy

Issue

From the 2018 *Workforce Development Needs: Survey Report*,¹⁰ almost 100% of employers report their business is affected in some way by poor literacy or numeracy, with

- 39% of surveyed employers indicating their business was highly affected by low literacy and numeracy
- another 32% indicated their business was moderately affected by low literacy and numeracy.

Noting that almost 3 in 4 people with disability, and far more when it is a person with an intellectual disability are **not** in the workforce, literacy and numerical literacy are one of the most significant and hidden issues in any workplace.

From the current adult literacy data, the Organisation on Economic Cooperation and Development (OECD) in partnership with country specific government research agencies, such as the Australian Bureau of Statistics in Australia, the *Programme for the International Assessment of Adult (16-65 years) Competencies (PIAAC)* states

- in Australia 44% of the adult Australian population do **not** have the literacy to manage a range of day-to-day readings skills. This does **not** include rural and remote Aboriginal and Torres Strait Islander people. **Nor** does it include people who live in institutions.
- when information is about numerical concepts, including time, money, estimates, budgets or the language of numbers such as *before* and *after*, the percent is now 53% of the adult Australian population who do **not** have the literacy to manage a range of day to day numerical literacy tasks.
- when English is your second language it is 10% worse, i.e. 54% for reading and 63% for numerical concepts.
- low literacy is not just the domain of a few people with disability, or only people with intellectual disability. It is the hidden disability of far more people. Under stress or being anxious or in a new environment, such as a new workplace can also impact on one's literacy, as does age and illness.

¹⁰ AI Group (2018)

Other literacy data

The Australian Government 2022 report *Don't take it as read – Inquiry into adult literacy and its importance*.¹¹ includes the above data and draws attention to other cohorts of people with low literacy who **may or may not** have a disability, including up to 68% of Aboriginal and Torres Strait Islander people have low or very low literacy.

The Lowitja Institute¹² estimates

- 40% of Aboriginal adults
- as many as 70% of Aboriginal adults in remote communities have 'Minimal English Literacy.' This is a different definition to the PIAAC data above.

There is little research on the literacy skills of people with intellectual disability. A paper by Buell, S., Langdon, P. E., Pounds, G., & Bunning, K. (2019)¹³ that involved reading and comprehension skills of 60 people with intellectual disability included,

- the average vocabulary skills of the adults with intellectual disability with at least beginner reading skills was 9 years of age
- the average reading skills of these adults was 7 years of age (equivalent to Grade 2 level of reading skills).

Some adults with intellectual disability may have further/more developed vocabulary skills and may be some literacy skills beyond the data above, as they are adults, with adult experiences. However, it is valuable to remember that the general literacy skills of more people with intellectual disability are likely to be more limited. As a person with intellectual disability, they are likely to require further practice and support to learn to read and understand new vocabulary and concepts and how to interpret them.

¹¹ Australian Government (2022) Don't take it as read – Inquiry into adult literacy and its importance. https://www.aph.gov.au/Parliamentary_Business/Committees/House/Employment_Education_and_Training/Adultliteracy/Report

¹² <https://www.lowitja.org.au/>

¹³ Buell, S., Langdon, P. E., Pounds, G., & Bunning, K. (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. *Journal of Applied Research in Intellectual Disabilities JARID*, 33(2), 219–231. <https://doi.org/10.1111/jar.12666>

Any employee, but more particularly, any people in supported employment or planning towards open employment from supported employment is likely to have low or very low literacy skills.

Article 21 of the United Nations Convention on the Rights of Persons with Disability,¹⁴ recognises that people with a disability need to have access to the information they need in a form they can understand and meaningfully use – and in the same timeframe as the rest of the community.

A requirement for people with disability to engage in work, should **not** be to learn to read complex documentation in the first instance, such as the job description, OH&S rules or HR requirements or their job tasks.

Strategy to include in the Employment Hub

Easy English

Easy English has been developed in Australia for the last 18 years. It is **not** Easy Read. Its intended audience is any person with low literacy. The content and images are selected to meet the diverse needs of the audience of that particular content.

Easy English uses universal design principles to reduce barriers for any person who has low literacy, irrespective of their background or the reason for their need of Easy English, i.e. people with different disabilities, First Nations peoples, older people, people with changing or deteriorating abilities, culturally and linguistically diverse communities and people of all ages with low levels of literacy.

Reading information in Easy English is **never** a test of how skilful a reader is, how many words they know or lots of new words to learn. Images are chosen based on the needs of the text and that audience.

¹⁴ United Nations. (2006). Convention on the Rights of Persons with Disabilities (UNCRPD).

<https://www.un.org/development/desa/disabilities/convention-on-the-rightsof-persons-with-disabilities/convention-on-the-rights-ofpersons-with-disabilities-2.html>

Quality best practice Easy English ranges in language reading equivalence from A Flesch-Kincaid (1948)¹⁵ grade 0 to grade 3, with an **average of grade 1** reading equivalence, depending on the specific topic.

It is also **never** a requirement that the reader have a knowledge of or need to learn what different symbols mean. Images used in Easy English are selected to assist meaning of the specific text beside the image. Images are simple, clear, iconic and are highly guessable. For example, an image of the natural gesture of ‘thumbs up’ to represent ‘good’ or ‘yes.’

There are a **maximum of 4 images** per A4 portrait style page. There are specific rules about the layout which maximises readability and minimises the reader feeling overwhelmed with the number of images or amount of text per page.











Photos are only used for specific buildings or places referred to in the text, eg: the specific place to come to, named in the content. Photos of people are only used, if they are specifically referred to in the text, and readers are likely to see or know that person.

Following our research, quality Easy English has measurable and repeatable guidelines which all trained writers can implement.

There is never assumed knowledge in development. In recent work for the eSafety Commissioner a report of some research was developed in Easy English. It became clear when engaging with people with low literacy that they did not have an understanding of the concept of ‘online abuse,’ a critical concept in the study. Consequently, a separate and detailed explanation of this was also created. A one-page explanation is in the report. But, for anyone who needs further assistance in grasping what it is, a separate document was developed.

¹⁵ Flesch, R. (1948). A new readability yardstick. *Journal of Applied Psychology*, 32(3), 221–233.
<https://doi.org/10.1037/h0057532>

This is one example of the front page and 2 pages of some work from 2023 for the eSafety Commissioner.

  <p>Some bad things. It is online.</p>	 <p>Some bad things It is abuse. You may get in trouble with the police.</p>  <p>A person says bad things to you. You feel scared.</p>  <p>They take your money. They do not give it back.</p>  <p>People ask you for your private information. It may be where you live. You do not want to give it.</p> <p>4</p>	 <p>You are online. Some bad things.</p>  <p>The person does the same thing. Like they say bad things to you. You feel scared.</p> <p>But</p>  <p>You are online. Like you are on your • phone • computer.</p>  <p>It is called online abuse.</p> <p>7</p>
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The full document and separate fact sheet is at Appendix 1a and Appendix 1b.

Examples on our website showcase our Easy English from around Australia and internationally on how workplace information using evidence-based best practice needs to be developed and available. <https://accesseasyenglish.com.au/access-easy-english-examples/>

Other commissioned work in Australia - Easy Read

Easy Read was originally developed in the United Kingdom. When I began Easy English development in Australia 18 years ago, I was initially commissioned to review Easy Read developed in the UK (and in other countries) to determine whether it was appropriate for our Australian context. At that time, it was identified that Easy Read was an important strategy, but was being written at a complex level that many people with low literacy could **not** and still can **not** read, understand and know what to do with. Hence the introduction of Easy English as discussed above.

In 2005, research was published stating people with intellectual disability reported Easy Read was better than what they had used before (which was only complex or plain language content), but to **keep improving** on it. The preface and development of Easy Read content has not changed substantially in that time.

Buell's 2019¹⁶ research included

- UK Easy Read content had a reading equivalence of a Flesch-Kincaid (1948)¹⁷ score of **Grade 4 to Grade 14**, with an average of **Grade 5** reading skill requirement.
- Prior to the most recent analysis, (Basterfield 2023),¹⁸ analysis of Easy Read developed in Australia shows it also had an average of **Grade 5** reading equivalence. (Basterfield, 2018a, 2018b; 2019a, 2019b, 2019c; 2021a, 2021b, 2021c; 2022a, 2022b)¹⁹

¹⁶ Buell, S., et al (2019).

¹⁷ Flesch, R. (1948).

¹⁸ Basterfield, C. What's in a name: Easy English or Easy Read? [paper presentation]. World Congress International Association of Communication Sciences and Disorders (IALP). New Zealand.

¹⁹ Basterfield, C. (2018a, February 12). Better evidence of Easy English. Better outcomes. What is the research saying? [paper presentation]. Virtual Disability Conference, Australia.

Basterfield, C. (2018b, July 23). Use Easy English. Access all areas. What is the research saying? [paper presentation]. International Society for Augmentative and Alternative Communication (ISAAC), Gold Coast, Australia.

Basterfield, C. (2019a). Plain Language; Easy English. What does it all mean? Intellectual Disability Australasia, 40(2).

Basterfield, C. (2019b, November 7). The international perspective on Easy English and Easy Read: The journey forward. [paper presentation]. Australasian Society for Intellectual Disability (ASID), Adelaide, Australia.

The 2023 findings indicate the Australian developed Easy Read now has a Flesch-Kincaid (1948)²⁰ of **Grade 3 to Grade 12**, with an average of **Grade 6** reading skill requirement, indicating it is now more complex than ever before. This does **not** fit with the reading skills, abilities or needs of adults with intellectual disability or other adults with low literacy.

Easy Read resources do **not** equate to supports for people with low literacy. It also has such a wide range of literacy skill requirements, that a person can not guarantee that this or the next fact sheet or report etc is something they may be able to read and understand, even if they could manage some of the previous one they read.

Easy Read is **not** accessible to people with low literacy or the vast majority of people with intellectual disability. If it includes PhotoSymbols which are photos taken from the UK (firstly non-Australian demographics, and then places, services, and buildings that are not Australian) most readers can not identify with them. Other people who do not identify as having an intellectual disability will not engage with Easy Read materials.

Your Easy Read commissioned document for this feedback to inform the development of this Employment Hub is also in the range that does **not** meet the needs of people who do have low literacy. It has

- a Flesch-Kincaid (1948)²¹ Grade Level Score of **Grade 8.4**, with a readability ease of only 54% indicating only a little over half the number of people who could read at a Year 8 standard of reading may be able to read and interpret it.

Basterfield, C. (2019c, August 6). What's in a name? Easy English or Easy Read: Does it matter? [paper presentation]. International Association for the Scientific Study of Intellectual and Developmental Disabilities (IASSIDD), Scotland.

Basterfield, C. (2021a, July 5-8). More evidence of difference: Easy English Easy Read. [poster presentation]. European Congress of IASSIDD, The Netherlands.

Basterfield, C. (2021b, July 5-8). UNCRPD: Why does it need to be so hard. [pre-recorded paper presentation]. European Congress of IASSIDD, The Netherlands.

Basterfield, C. (2021c, August 30). What's in a name? Perspectives on Easy English and Easy Read. [paper presentation]. KLAARA, Easy to Read Conference, Switzerland.

Basterfield, C. (2022a, September 4). Evidence of difference: Easy English—Easy Read. [paper presentation]. AGOSCI, Hobart, Australia. Basterfield, C. (2022b, May 24). Evidence of difference: Easy English—Easy Read. [3 minute poster presentation].

²⁰ Flesch, R. (1948).

²¹ Flesch, R. (1948).

The Employment Hub Easy Read document also has

- sentences of 10.98 words per sentence, indicating more complex sentences with embedded or other phrases and longer sentences than are readable and understood
- many sentences are well above the 10.98 length. For example, the one below on page 9 is 24 words in length, has many ideas and is over 3 lines in the document.
 - o The centre will have staff to do the work and help train employers to make more opportunities for people with disability in the workplace.

No reader with low literacy will be able to read this sentence, comprehend it and know what it means for them

- x 8 occurrences of '*'.' This symbol is for multiplication. It has never been used in any other plain or other type of content, except for multiplication. Although explained in the introduction, it has no connection to previous reading experience, and therefore is confusing to the reader.
- at least 4 partial-definitions of new words, which are not necessarily the most complex concepts in the text. Yet the reader must learn to read, learn to understand this concept, and then see it in new sentences with new ideas in the content. This is overwhelming for a person with intellectual disability or low literacy and increases their cognitive load unnecessarily.
- Other complex words and concepts are assumed to be known by your reader. People with intellectual disability and/or low literacy do have a lower threshold of general knowledge. This needs to be accounted for in development.
- X 2 occurrences of 'if' indicating complex sentence structure
- Complex email addresses and weblinks. A person with low literacy is less likely to be able to accurately type in the correct letters for these, without error. They do not have the literacy or experience with digital skills to correct these errors with ease
- Language such as 'research,' 'employment,' 'accessible,' 'meaningful,' 'opportunities,' are a few examples of multisyllabic language which the reader with low literacy and parallel low word knowledge is far less likely to hear in their environment, understand what they mean and be able to read them with meaning. All this language can and must be distilled by the writer to the audiences every day words. EG: Employment – 'job,' 'work,' 'get a job' or 'help to get a job.'
- Language such as 'Hub' is corporate language. This can **not** be in the content for people with intellectual disability and/or low literacy. A different, every day and concrete meaningful word must be used to make content accessible for the reader.

Images in the Employment Hub Easy Read document have

- all the images from one set. These images were originally created for speech pathologists to use with people learning to use a communication board. Most of these images require learning to be able to understand and interpret. A reader with low literacy is unlikely to have come across these images, and not learnt them in any previous time. A reader of your document does not want to have to view and recall what different images mean from being taught them previously. These images in your Employment Hub Easy Read document from the Boardmaker set are mostly highly unguessable
- too many images per page. A full page of text appears to have between 5 and 7 images per page
- most images with complexity in them, making them abstract. A reader wants concrete concepts. For example. The thinking bubble image on page 10, does not mean anything to the reader with intellectual disability, nor many people with low literacy. Additionally, the content in that bubble is so tiny it is impossible to see what the images in the bubble are
- All images are small. With more unnecessary detail in them also, they become uninterpretable by the reader.

This Easy Read commissioned content, and any Easy Read commissioned content is

- **Not** fit for purpose for people with low literacy
- Does **not** support a person to meaningfully engage in the information.
- Is **not** supported by the research.

Easy Read is an enormous waste of money and resources. It is **not** accessible to people with low literacy. It does **not** improve access to meaningful information for any people with low literacy, and in particular the more vulnerable people with intellectual disability.

It must **not** be commissioned by a new Federal Government Disability Employment Hub.

Only Easy English is developed to a level of low potential literacy and word knowledge of a person with low literacy skills with or without an intellectual disability. As the Hub is to learn about new ideas or help, it is even more critical that the text and images used to construct the content are simple and easy for the reader to use. This is more likely to meet the needs of people with low literacy, including people with intellectual disability.

The known reading equivalence average for people with intellectual disability is equivalent to a 7-year-old reading age, which is grade 2 reading equivalence. Only Easy English development fits this parameter.

Appendix 2 is an example I created of a Disability Royal Commission report based for Hearing 23 in Easy English in 2023.

Appendix 3 of the same content in Easy Read of the publicly available report of Hearing 23. It is a clear illustration, of the significant differences in them.

Read also the analysis attached

Appendix 4, Basterfield 2019 *What's in a name*, a summary of research and international presentations on this topic.

Appendix 5 is further detailed discussion in my recent submission to the NDIS CALD Strategic Development, pages 15-23.

Creators and writers of Easy Read will not see the differences between Easy Read and Easy English.

Yet, people who need low literacy can see and describe the differences if not the specifics of the analysis of differences between Easy English and Easy Read. They describe Easy English as having fewer words, shorter sentences, and use more words they know. They also talk about Easy English having more space on a page. This aids them in accessing the content. They often surprise themselves about how many words they can read and then understand what the content is about and what they can do with it when using Easy English.

Recommendations

To commission only evidence based best practice access to written information, called Easy English to support access to written material for the potential job seekers and supporters of the Employment Hub.

Digital Inclusion

None of this discussion addresses the enormous issue of digital inclusion for people with low literacy. Digital inclusion is the

- affordability of digital tools such as internet and hardware relative to your income,
- your access to them and
- the extent you can use those digital tools.

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 on provider or services websites, (or not available at all) instead a chat box or email is the primary means to access that service, which relies on literacy once again. This is discriminatory.

It may appear to professionals who use computers daily, that computer access, use of them and the internet is well developed through all our communities. The data below demonstrates this is certainly **not** the case.

The Employment Hub must address this in how information is disseminated and provided to the community and in particular communities, as there are added challenges and difficulties.

One in five households do **not** have access to computers.²² Where are these households likely to be? Low socio-economic groups, institutions and disability group homes and other congregate care environments such as forensic units.

²² 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.

Clinical experience has also highlighted that many support staff do not have access to computers or the internet in their own home.

In the work I do with clients providing Speech Pathology services in community residential units (group homes) it is rare to see a computer available to clients.

During the pandemic, state governments recognised this considerable need for families. They issued laptops and dongles to many families for remote learning. However, being given a laptop and dongle does not equate to having digital literacy.

Only two in five people where English is their first language are able to use the internet at a level of competency to find and locate information, to then use it to work out what they need to do. (OECD, 2013)²³

This is not sufficient for the many vulnerable people who are meant to be able to access and use the Employment Hub.

To have low literacy there needs to be an immediate entrance to information that the person can read and use. It is not possible for the person to travel through multiple levels of navigation to locate content. Best practice indicates only one level of navigation, at most, is when you will achieve **some** equity for **some** people in access via the internet.

Studies in 2020,²⁴ 2021,²⁵ and 2023²⁶ weighted aspects such as access, affordability (in relation to income) and digital ability to find what you need, to do what you want on the technology. It is called the Australian Digital Inclusion Index (ADII).

²³ Organisation for Economic Cooperation and Development (OECD). (2013). *Programme for the International Assessment of Adult Competencies (PIAAC)*. <http://www.oecd.org/skills/piaac/>

²⁴ Australian Communications and Media Authority (2020) Measuring Australia's Digital Divide. Australian Digital Inclusion Index 2020. https://digitalinclusionindex.org.au/wp-content/uploads/2020/10/TLS_ADII_Report-2020_WebU.pdf

²⁵ Australian Communications and Media Authority (2021) Measuring Australia's Digital Divide. Australian Digital Inclusion Index https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/10/ADII_2021_Summary-report_V1.pdf

²⁶ Thomas, J., McCosker, A., Parkinson, S., Hegarty, K., Featherstone, D., Kennedy, J., Holcombe-James, I., Ormond-Parker, L., & Ganley, L. (2023). *Measuring Australia's Digital Divide: Australian Digital Inclusion Index: 2023*. Melbourne: ARC Centre of Excellence for Automated Decision-Making www.accesseasyenglish.com.au

The average ADII in the report at March 2020 was 63 (out of 100). A score of less than 53 (out of 100) was considered to be a low index. In 2021, the average score out of 100 was 67, during the pandemic. However, analysis showed it was the people who already had good internet use who increased their skills. Those who had low or poor digital inclusion scores did not improve at all.

Current ADII 2023 findings indicate

- 1 in 4 people are digitally excluded
- Another 10% of people have mobile access only – limits data availability.

These are more likely to be people who are marginalised and be a significant part of vulnerable communities. There is a likelihood to be more people using pay per use internet access, and availability to the internet is related to cash/income available rather than using an annual subscription service. This is also a more costly way to access the internet than a subscription.

This is the list of groups with a low Digital Inclusion Index.

- House hold income Q5 (under \$35k) and household income Q4 (\$35K- \$60K)
- Aged 65 +
- Less than secondary education
- Disability
- Not in labour force (ADII score 54.3)
- Indigenous Australians (ADII score 55.1).

Printed content needs to be available in Easy English, and also plain language for some people.

We have been developing a website for people with low literacy and low digital literacy, based on the research and meeting the needs of the consumers. This is a blog from December 2023. <https://medium.com/@accesseasyenglish/digital-literacy-for-people-with-low-literacy-b7d6f3f7e0fd> Our website, www.readee.com.au will go live in January, 2024.

and Society, RMIT University, Swinburne University of Technology, and Telstra. DOI: 10.25916/528s-ny91

Response to your questions

The most vulnerable people are the ones who are not included in data collection as they can not communicate in a so-called 'normal' way and/or do not have the literacy to meet the demands of our literate society.

Every aspect of the proposed Employment Hub, and more particularly for any person with intellectual disability must take into consideration

- the way the person understands their word (receptive language)
- the way the person expresses themselves (expressive communication)
- the communication supports a potential employee may need in the workplace, and on their journey to and from work
- how the individual may access reading material (or not)

what digital tools they may have access to, and what digital skills the person may or may not have.

An Employment Hub should cover all aspects of the various models suggested to provide the most up to date, evidence-based supports for people to more effectively access work.

People who have complex communication needs often prefer to meet face to face, (not even via zoom) to assist in facilitating their communication. This option must be available as a choice to people accessing the Hub. It always takes more time to communicate via means other than speech. Allowance for this must be planned for.

Additionally, many people with low literacy are from lower socio-economic sections of our community. Being unemployed also reduces one's capacity for additional tools, that they may or may not be able to use, such as an iPad, iPhone or some sort of computer. Internet costs are an additional burden, that can not be assumed to be available to each person. Access to low cost or no cost printing facilities are also less likely to be available to a person who is not employed.

All aspects of the Employment Hub must be accessible in Easy English, in print, and on an easy to navigate website.

Summary of response

As 1 in 7 people has a communication disability the needs of this diverse group of people must be considered in how the Employment Hub operates and where it operates.

People with a communication disability are more likely to be less employed than people without a communication disability. Many people with communication disability do prefer a face-to-face interaction, particularly those with intellectual or other disabilities where processing and memory are compromised.

Employers must be supported to provide a communication environment that supports a person with a communication disability.

Speech pathologists are the allied health practitioners with the expertise to support the most effective communication strategies for and with individuals and their workplaces. As allied health practitioners, we follow evidence based best practice.

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** for workplaces. In 2023, Easy English has an average reading equivalence level of grade 1.

Commissioning Easy Read is **not** OK. Currently, Easy Read, on average, has a reading equivalence level of grade 6. However, often it is far more complex as shown in the Easy Read that was commissioned for this Employment Hub, Call for Feedback.

The Employment Hub must provide printed copies of Easy English content. It should not be left to a small request on a website page that is difficult to locate to request this. And once again this relies on internet access to do this.

It is a reality that the internet and websites are in our community. Any Employment Hub development needs to consider the needs of the real audience of people needing to access the Hub, that is, those with none or very little digital engagement. It is possible to rethink the navigation and complexity of websites to make them user friendly to this community. A call centre, with easy to find phone number from printed collateral must be available.

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



Thanks, Cathy

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