
30 March 2022

Submitted via www.parliament.nz

Governance and Administration Committee
Parliament Buildings
Wellington

RE: Plain Language Bill

Everyone in Aotearoa should have easy access to helpful information when engaging with public services. FinCap welcomes the opportunity to comment on the Plain Language Bill (the Bill). We strongly support the need for plain language in official documents and websites.

We consider the bill promising. However, we seek to highlight other work needed on wider but related issues. FinCap recommends that decision makers also support work on inclusion and accessibility to essential services for all whānau in Aotearoa and we discuss this more in the submission below.

About FinCap

FinCap (the National Building Financial Capability Charitable Trust) is a registered charity and the umbrella organisation supporting the 200+ local, free financial mentoring services across Aotearoa. These services support more than 70,000 people in financial hardship annually. We lead the sector in the training and development of financial mentors, the collection and analysis of client data and encourage collaboration between services. We advocate on issues affecting whanau to influence system-level change to reduce the causes of financial hardship.

General comments

Important information in official documents and websites should be clear and concise. For a busy whānau experiencing several challenges at one time, the clarity means that less time is spent interpreting the steps that they need to take. This allows for more attention and time to be given to the more pressing matters that may be present.

A recent survey of financial mentors showed that their client cases have become more complex.¹ This reflects the multiple and compounding challenges that whānau can face. Through ensuring that plain and clear language is used by public services, time can be saved for financial mentors and the whānau they walk alongside.

Furthermore, plain language minimises the chance of error that can result in further harm to whānau. When the expectations are clear in terms of both what they need to do and what they can expect from the service, then the likelihood of unnecessary financial stress and confusion is reduced.

¹ Impacts of COVID-19 on building financial capability: 2021 snapshot - <https://www.fincap.org.nz/wp-content/uploads/2022/01/COVID-19-financial-mentor-snapshot.pdf>

Response and recommendations

FinCap supports the idea of appointing plain language officers. However, we recommend that training should be thorough across all staff to promote a change in culture. This includes ensuring that both written and spoken language is free from both jargon and judgement.

We also must highlight the importance of consistency. Where documents are providing the same information, the format should be the same. For example, when a benefit breakdown form is given then this should always look the same. This helps to avoid confusion and excess time being spent interpreting the information.

Relevant FinCap work on inclusion and accessibility

To prevent avoidable hardship and harm in our communities FinCap advocates for inclusion and accessibility to essential services for all whānau in Aotearoa. While the development of this bill supports an aspect of accessibility, there are many ways that accessibility to public and essential services can be addressed.

We strongly recommend action to improve accessibility through the establishment of direct priority phone lines for financial mentors to public service departments. Inland Revenue and the Ministry of Social Development are particular priorities given the nature of financial mentors' mahi.

Such action would improve accessibility to the support that a whānau might need. Where information impacts the financial wellbeing of whānau, such as information about tax obligations or benefit entitlements, easy access is essential. A direct phone line would enable financial mentors to support a whānau facing hardship to get all the important information they need in a timely way while that whānau is attending a support session for their overall wellbeing. Improved accessibility would reduce the risk that whānau and their financial mentors' time is wasted when avoiding further hardship and harm is time sensitive.

Financial mentors play a key role in supporting whānau with engaging with public service departments. Currently the Ministry of Social Development (MSD) provides funding for financial mentors at 131 providers across Aotearoa, these financial mentors are both professionals and volunteers. There is also a cohort of financial mentors at around 70 other providers/services who do not receive MSD funding. These financial mentors are meeting communities' needs and need sustainable funding too.²

Clear communication is important for those engaging with all essential services. The right to essential services extends to the right to access banking services. Access and use of money is an essential service, allowing access to goods and services, and is at the forefront of financial inclusion. FinCap strongly recommends that all in Aotearoa have a right to access the banking and cash services necessary for their health, wellbeing and social participation.³

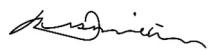
FinCap would welcome the opportunity to speak further to our wider work on accessibility.

Please contact Janeka Rutherford-Busck, policy advisor at FinCap on 027 261 3690 or at janeka@fincap.org.nz to discuss any aspect of this submission.

² Budget policy statement 2021 submission <https://www.fincap.org.nz/wp-content/uploads/2022/02/220128-SUB-Budget-Policy-Statement-2021-Budget-2022.pdf>

³ Te Moni Anamata – Cash system redesign submission <https://www.fincap.org.nz/wp-content/uploads/2022/03/220303-Cash-System-Redesign-Submission.pdf>

Ngā mihi,



Ruth Smithers
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FinCap