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Plain Language Assessment

Document owner: Tweed Shire Council

Document title: Drought and Water Restrictions Policy

Certification level: Gold

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Background

In 2021, Tweed Shire Council adopted an updated Drought and Water Restrictions Policy (Version 4.0). The policy was revised based on issues that emerged from implementing the previous version and feedback from stakeholders. The updated policy was also edited in line with plain English principles.

The policy sets Council's rules for temporary water restrictions in the Tweed during times when the town water supply is limited. It explains why restrictions are needed, how and when restrictions are implemented, how restrictions are communicated to residents, and how compliance is monitored. The policy includes detailed information about the different levels of water restrictions that may apply to different water users.

The policy is publicly available and needs to be easily understood by the residents who will be affected by it.

Plain language writing and editing (relevant for Bronze accreditation)

Assessment overview

The textual components of plain language are successfully applied in Version 4 of Tweed Shire Council's Drought and Water Restrictions Policy and meet the requirements for Bronze PlainLanguagePro accreditation. Tweed Shire Council has fully rewritten earlier versions of the policy according to the principles of plain language. Tweed Shire Council understands that plain language is a journey of continual improvement, and has policy-review processes in place to ensure consistent updating.

Assessment detail

Audience

The policy is publicly available from Council and is written in a style suitable for a lay audience. The main part of the policy fits within Council's suite of policy documents and adopts the appropriate policy template; this part of the policy is most likely to be relevant for interested readers. The chart attached to the end of the main policy is suitable for a broad readership and varying literacy levels.

Purpose

The policy clearly states both its purpose and legislative context. The policy explains in simple, plain language the reasons why water restrictions may be introduced. It clearly explains the triggers for water restrictions and shows that water restrictions and restriction easing are not arbitrary or random decisions by individuals within Council.

Content

The policy includes an appropriate level of breadth and depth to answer users' questions. The key detail is available in chart form, which makes it easy for users to find the relevant information. The policy review cycle helps to ensure that any content problems can be identified and corrected.

Complexity

Policies are, by their nature, bureaucratic documents that address complex content. This policy presents its content in a straightforward way by using everyday words, clear sentence structure, and meaningful headings.

Structure

The policy is structured into sections and subsections that are easy for readers to navigate. In comparison with the previous version of the policy (Version 3), the rewritten version (Version 4) is more likely to provide content overviews before diving into detail (for example, the overall order in which water restrictions are introduced is outlined before moving on to a detailed rationale for each step).

The detailed policy advice is presented in an easy-to-navigate chart, which provides clear instructions about allowable water use at the four restriction levels, clustered according to types of water use. It is easy to use the chart to locate a water-use type (e.g., agriculture) and understand exactly what water use is permitted. This chart is the part of the policy most likely to be used by the general community. It can be easily separated from the main policy for wide distribution.

Tone

The policy adopts a clear, plain, conversational and professional tone. The main part of the policy uses third person and present tense to explain how Tweed Shire Council handles water restrictions during drought. The chart attached at the end of the policy uses a second-person, instructional style to provide readers with clear advice about the water restrictions that apply to them.

Paragraphs and bullet points

The policy uses short paragraphs (one to four sentences), with one key idea per paragraph. Bullet points are used extensively, making the policy easy to skim-read. Paragraphs are generally arranged to present the key information first and to clearly link with the relevant section heading.

Sentence structure and word choice

The policy uses short sentences and active voice. Nested phrases are avoided whenever possible. The words are as plain and simple as possible, while doing justice to the content. The chart uses simple, instructional text to clearly explain what water use is

permitted. In contrast, earlier versions of this chart used wordy sentences written in third person from Council's perspective to communicate the same information.

In comparison to the previous version of the policy (Version 3), the rewritten version (Version 4) uses shorter sentences, simpler sentence structure, and more everyday words. The previous version used several empty phrases (such as 'in broad terms' and 'it is desirable that'), which have been removed in the new version.

Readability

Readability scores provided a limited (and somewhat flawed) measure of plain English, but can be helpful for comparing different versions of the same text. The Hemingway Index measures adverb use, passive voice and sentence complexity to suggest the education level required to read the text. A reading level of Year 7 or Year 8 is considered appropriate for many public documents. The Hemingway Index scored the original Drought Water Restrictions Policy (Version 1) at a Year 10 level. The rewritten policy (Version 4) scored a Year 6 reading level, and the graphical chart providing detailed policy information scored a Year 3 reading level.

Graphic devices and layout

The layout of the main part of the policy is simple, clear and appropriate. The layout conforms with Council's standard template for policies. Navigation is supported by a contents list and clear differentiation between high-level and lower-level headings.

The chart providing detailed policy information about water restrictions is easy to navigate. The chart uses a landscape layout, providing sufficient width to present content about the four different water restriction levels for different types of water users.

The detailed policy chart has been extensively redesigned and updated for Version 4.

- The chart in Version 3 covers 13 pages and uses a portrait format with hard column borders. Colour is used only to identify different water users, not to help readers navigate restriction levels. The text is written to suit an internal audience, with ID codes that are meaningless to external readers and a third-person voice with excessive nominalisations.
- The chart in Version 4 covers 12 pages in a landscape format with a flexible (but easily navigable) approach to columns and no hard borders. Shading is used to cluster types of water users. Colour is used to identify water restriction levels, with the colour scheme easily linked to the increasing urgency of restrictions (green for Level 1, yellow for Level 2, orange for Level 3, red for Level 4). Blocks of colour identify and cluster relevant information, while blank space is used to identify when no new information is applicable. Coloured text is used to highlight key information (and its minimal use ensures that important information stands out). The ID codes have been removed. The text is written in a second-person, instructional style.

Research (relevant for Silver and Gold accreditation)

Assessment overview

The research conducted by Tweed Shire Council for its Drought and Water Restrictions Policy (Version 4.0) is not easily separated into initial user research during document development (silver accreditation) and user testing prior to final production (gold accreditation).

However, the policy is a living document that has been revised through successive iterations since 2009. Each iteration displays elements of both initial research and user testing. With each iteration, Council has actively sought feedback on how to improve the policy. Assessed over the full life of the document, the research conducted by Tweed Shire Council meets the standard required for gold accreditation.

Assessment detail

The initial research for Tweed Shire Council's Drought and Water Restrictions Policy began in April 2009, when Council engaged consultants to prepare a drought management strategy. Since 2009, the policy has been updated and rewritten seven times in response to:

- Feedback from stakeholders and community members
- Requirements from the NSW Office of Water
- Water Strategies Review Project Reference Group research and feedback
- Plain English principles.

Expert review was conducted internally by the Manager Water and Wastewater – Business and Assets (Anthony Burnham) and Water Efficiency Engineer (Elizabeth Seidl), both of whom have extensive experience in drought management, water efficiency and demand management.

Initial research for the new version included comparing Version 3 with the original drought management strategy and seeking advice on emerging issues and water use trends. Research also considered internal responses about the policy's implementation during the 2019–2020 water restrictions.

A draft of Version 4 of the policy was released in October 2020 for feedback and review – representing the user-testing phase of the research with an open invitation for feedback from internal stakeholders and the wider community. The research generated 51 suggestions for improvement, mostly from internal stakeholders (with some suggestions from the wider community received via social media and at events). The review team used a transparent

process to record and address feedback, with detailed records about which suggestions were incorporated into the revised policy.

The consultation process for Version 4 of the policy resulted in several iterations, each updated based on comments from stakeholders and users. During 2021, changes included:

- Plain English updates based on expert review
- Content clarifications based on expert review
- Stakeholder review (including Councillors, Council’s Executive Leadership Team, Council’s Corporate Management Team and key staff)
- A stakeholder forum with the Resident, Environment and Industry Group Roundtable (this group enables Council to seek advice from the local community and keep the community informed about relevant issues).

Examples of text used within the policy

Text used in Version 1	Plain English text used in Version 4
<p>These restrictions are for implementation only during periods when the longevity of the bulk water supply is threatened – most often related to drought periods – and would be implemented via a public notice from Council for connected properties to restrict water use.</p>	<p>Water restrictions are implemented when the demand for water is greater than the actual or anticipated supply. This happens mostly in drought, however there are other circumstances that can trigger restrictions.</p>
<p>... ensure protection of the water supply commensurate with the threat posed</p>	<p>... make sure our:</p> <ul style="list-style-type: none"> • limited water supply lasts as long as possible (rewritten as part of a bullet point list)
<p>In designing restrictions, it is important to recognise that the implementation of a particular level of restrictions is dictated by the need to achieve a predetermined demand reduction target at a particular dam level.</p>	<p>Council works on the basis that:</p> <ul style="list-style-type: none"> • each level of restriction is designed to achieve a specific water use target (rewritten as part of a bullet point list)
<p>Log of water use required</p>	<p>You must log water use</p>
<p>Permitted for compaction and dust suppression</p>	<p>You can use water to compact materials or suppress dust</p>