Submission to consultation on the Department of Social Protection's Statement of Strategy 2025-2028

Submitted to the Department of Social Protection

7 March 2024

NALA

National Adult Literacy Agency
Áisíneacht Náisiúnta Litearthachta do Aosaigh

Contents

Summary of recommendations

In this submission, we are calling for the next Department of Social Protection (DSP) Statement of Strategy to commit to being a literacy friendly department in your:

- communications;
- services to the public; and
- employment supports.

We welcome the good work that the department has already done to be literacy friendly, and we have eleven recommendations for how you can build on this.

1. Make a strategic commitment to plain language.

2. Adopt the voluntary International Organization for Standardization (ISO) Plain Language Standard.

3. Develop a tailored content guide for your department.

4. Develop a tailored eLearning module for your department.

5. Create a departmental plain English champions' network.

6. Collaborate with the Citizens Information Board to carry out user testing.

7. Make a strategic commitment to literacy friendly services.

8. Ensure that people with literacy needs have a voice in your department.

9. Include in-person and telephone services in your digital strategy.

10. Prioritise literacy, numeracy and digital skills training in employment supports.

11. Prioritise staff in employment services for literacy awareness training.

Introduction

We are the National Adult Literacy Agency (NALA), a registered charity and membership-based organisation. We receive annual funding from SOLAS to support the Further Education and Training strategy (SOLAS 2020) and the Adult Literacy for Life strategy (SOLAS 2021).

We believe that literacy is a human right. Everyone in Ireland should have the chance to develop their literacy, numeracy and digital skills to take part fully in society. Our mission is to:

- campaign for literacy as human right;
- be leaders and champion best literacy practice; and
- support organisations in their efforts to be literacy friendly.

NALA welcomes the opportunity to contribute to the public consultation on the Department of Social Protection's Statement of Strategy 2025-2028.

Literacy, numeracy and digital skills

Literacy, numeracy and digital skills involve listening, speaking, reading, writing, using numbers and everyday technology to communicate, to build relationships, to understand information and to make informed choices in all areas of everyday life.

Literacy, numeracy and digital skills enable people to reach their full potential, to be active and critical participants in society and to help address poverty and social exclusion.

In this document, we use the word "literacy" to refer to all of these skills.

Literacy and equality

Literacy needs arise because of educational and wider structural inequalities. A person with literacy needs is more likely to have:

- parents with low educational attainment;
- poor health; and
- low income.

They are also more likely to be unemployed or outside the labour force (Central Statistics Office CSO 2024).

For equality, priority should be given to those who have experienced the most educational disadvantage – the **furthest behind first** principle in the United Nations (UN) 2030 Agenda for Sustainable Development (UN 2015). For the furthest behind, there must be enhanced and targeted opportunities and supports.

Some people have their **literacy needs met**; others do not.

This can be for **many reasons**.

Adult Literacy for Life strategy

The Government published a **10-year Adult Literacy for Life strategy** in 2021. It aims to: "ensure that everyone has the necessary literacy, numeracy and digital literacy to fully participate in society and realise their potential" (SOLAS 2021, p4).

This strategy commits to a cross-Government, cross-economy and cross-society approach to support literacy needs. It means that a whole range of sectors will understand literacy barriers and work together to remove them. This includes the Department of Social Protection along with other government departments and other public service providers.
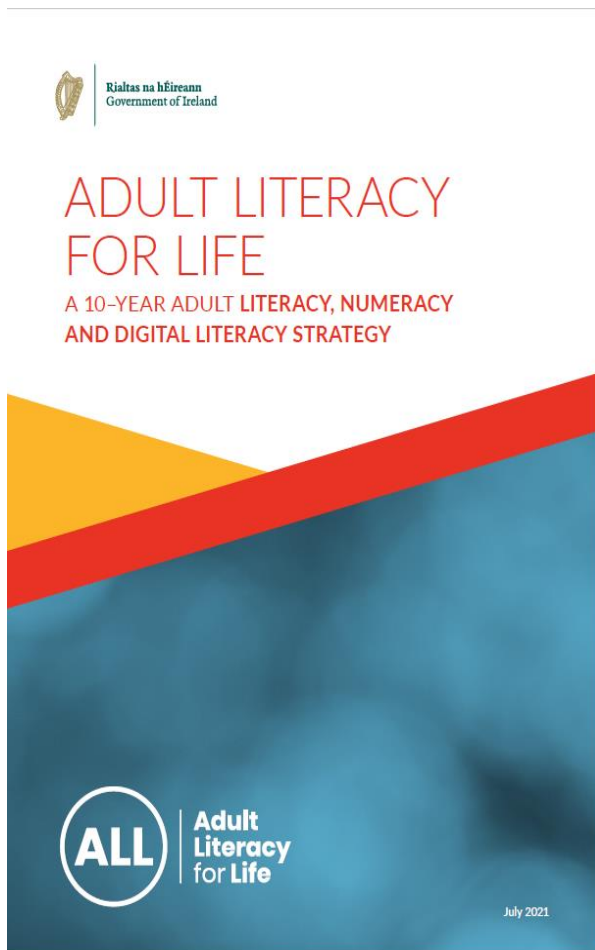
www.adultliteracyforlife.ie

Adult literacy needs in Ireland today

Findings from the Organisation for Economic Co-operation and Development (OECD) Survey of Adult Skills 2023, released on 10 December 2024 (CSO 2024), show the following:

- **1 in 4** adults[1] in Ireland (25%, around 835,000 people) do not have basic proficiency in **numeracy**[2]. This means that 1 in 4 adults can, **at best**, do basic calculations but may struggle with tasks needing multiple steps.

    Services like the **MyWelfare.ie calculators and estimators** are essential for this group, and many people will still find them difficult or impossible to use.

- **1 in 5** adults in Ireland (21%, around 700,000 people) do not have basic proficiency in **literacy**. This means that 1 in 5 adults can, **at best**, understand short texts and organised lists, when information is clearly indicated.

    Social welfare forms, for example, can be a challenge for this group.

Other findings on digital skills in 2023, from the Digital Economy and Society Index (European Commission 2024), show that

- **More than 1 in 4** adults[3] in Ireland (27%, just over a million people) do not have basic **digital** skills. This means that more than 1 in 4 adults have not done at least one activity in each of five digital competence areas[4]. For example, sent an email, fact-checked something or changed software settings.

    These adults may struggle to find information on a website or use a touchscreen, for example.

---

[1] Aged 16-65
[2] This means they score at or below Level 1 on a five-level scale
[3] Aged 16-74
[4] Information and data literacy; Communication and collaboration; Digital content creation; Problem-solving; and Safety skills

Our recommendations

This part of our submission presents practical recommendations for your Department to consider and include in your Statement of Strategy 2025-2028.

We are making these recommendations based on what we know from research evidence and our 45 years as literacy experts.

We have grouped our 11 recommendations into four themes:

1. Plain language
2. Literacy friendly services
3. Digitalisation
4. Employment services

Implementing our recommendations for plain language, literacy friendly services and digitalisation will help the DSP to meet your obligations under the European Accessibility Act 2025 (Government of Ireland 2023).

Theme 1: Plain language

First, we commend the Department of Social Protection (DSP) for your good practice in relation to plain language. The DSP is a regular client of our Plain English Training and Editing Services and has been awarded the Plain English Mark on many documents.

We understand that the DSP:

- has an intranet of plain English resources;
- conducts research into best plain English practice; and
- user tests communications with customers.

To build on this good work, we recommend the following.

1. **Make a strategic commitment to plain language**

    A commitment to plain language in the new Statement of Strategy would cover internal communications and communications with the public. Your customers and others notice when you send out information in plain language and when staff are aware of literacy needs. Leadership could explore innovative ways to embed a plain language culture throughout the department. Our further recommendations would support this strategic commitment.

2. **Adopt the voluntary ISO Plain Language Standard**

    Include the voluntary International Organization for Standardization (ISO) Plain Language Standard (ISO 2023) in your list of standards to meet (see p9 of **your current strategy**, Department of Social Protection 2023). This standard "provides all sectors, in nearly all languages, with a set of guidelines and strategies to make information more accessible and effective" (**International Plain Language Federation**). More ISO standards on plain language will be published soon and there will be guidance on implementation from experts at the **Clarity** / **PLAIN** conference in Brussels this November (details to be confirmed).

3. **Develop a tailored content guide for your department**

    Develop a DSP Content Guide for writing for gov.ie and writing for the public. This could include templates for letters, webpage, internal emails and a shared glossary of most commonly used terms in your department. Your content guide could be informed by:

    *   the **gov.ie content guide** (Gov.ie 2024)
    *   the **Customer Communications Toolkit for Services to the Public** (National Disability Authority NDA and Department of Public Expenditure and Reform DPER 2023)

4. **Develop a tailored eLearning module for your department**

   Develop a custom plain language eLearning module similar to what the Courts Service have produced for their staff[5]. In this way, plain language training can be part of an induction and then staff can take part in a regular schedule of tailored training and refreshers with NALA.

5. **Create a departmental plain English champions' network**

   Create a network of plain English champions across DSP units and divisions to foster a community of practice. This network can consider how innovations such as generative Artificial Intelligence (AI) can be used to improve plain language efforts. Staff across the DSP already have plain English expertise which they could share and develop with colleagues.

6. **Collaborate with the Citizens Information Board to carry out user testing**

   Collaborate with the Citizens Information Board (CIB) to do user testing and user journey mapping. DSP and CIB services are closely linked and this could improve both services. Customers would benefit from consistent messaging, and both services would save time on producing communications.

---

[5] A plain language eLearning module is also forthcoming from the Adult Literacy for Life office.

Theme 2: Literacy friendly services

Literacy friendly services go beyond plain language. A literacy friendly service makes it as easy as possible for customers to get the information they need, to use their services and to participate fully. In a literacy friendly service, staff are trained to recognise and support customers who may have literacy needs.

The following recommendations are a necessary complement to our recommendations on plain language.

7. **Make a strategic commitment to literacy friendly services.**

   A strategic commitment to literacy friendly services means, for example:
   - training frontline staff in literacy awareness[6]; and
   - supporting them in policy and practice to take the time to assist customers with literacy needs.

8. **Ensure that people with literacy needs have a voice in your department**.

   Relatively small changes can empower people with literacy needs to have their say. For example:
   - carry out customer surveys by telephone as well as online;
   - include people with literacy needs as a target group for inclusion initiatives, and as representatives on customer panels; and
   - attend NALA learner events to explain your services and get feedback from literacy learners.

   We are also happy to provide advice on literacy matters.

---

[6] NALA offers a range of **Literacy Awareness Training** options, and the Adult Literacy for Life National Programme Office have also produced a short online course, "**Let's Talk About Literacy**".

Theme 3: Digitalisation

We welcome the inclusive and person-centred approach of the DSP's Statement of Digital Strategy 2022-2025 (Department of Social Protection 2022).

The best way to achieve 90% of applicable services being delivered digitally (Department of the Taoiseach 2022) is "by desire" as you have set out – by making the digital option simple, accessible and beneficial to the user.

However, **even if** 80% of adults in Ireland have basic digital skills by 2030 (target from Department of the Taoiseach 2022 and **Europe's Digital Decade**), 20% of adults will still not be able to engage in the main process by which 90% of DSP services are delivered[7].

We urge you to give serious consideration to how you will:
- maintain the quality and availability of phone and in-person services; and
- effectively integrate them with digital services.

Our recommendation for digitalisation is simple.

9. **Include in-person and telephone services in your digital strategy**.
   Prioritise these essential services as much as digital services. Do this by highlighting their importance and how they complement digital services to create a fully inclusive public service.

---

[7] More than 20%, most likely, as the DESI measure for this 80% target only covers adults up to age 74 (European Commission 2024) and we know that older adults typically have a lower level of digital skills

Theme 4: Employment services

The current context of full employment in Ireland means that more resources can be aimed at the "furthest behind" who are most distant from the labour market. The Programme for Government commits to "intensive activation supports" to help this cohort (Government of Ireland 2025, p102).

Education and training in literacy, numeracy and digital skills must be a central part of any employment supports. They are the foundation on which other skills are built, and they are transferable skills which make people more resilient to future economic changes.

Sadly, the OECD Survey of Adult Skills 2023 (CSO 2024) has found that people who have lower levels of literacy and numeracy are more likely to be unemployed or not in the labour force. We recommend the following actions to address this:

10. **Prioritise literacy, numeracy and digital skills training in employment supports.**
    For example:
    - Consider how DSP employment services can work with Education and Training Boards (ETBs), NALA and others to provide a range of appropriate learning options. For instance, NALA offers the **Learn with NALA** distance learning and eLearning courses that might be relevant to DSP beneficiaries.
    - Design employment supports in line with adult education principles such as autonomy, diversity and the "wealth model". This model values the skills and experience that adult learners already have (see for example NALA 2012).

11. **Prioritise staff in employment services for literacy awareness training.**
    We need to empower staff in the employment services as they are very likely to come across people with literacy needs. Your staff play a crucial role in breaking the cycle of socio-economic disadvantage.

Conclusion

In this submission, we are calling for the next Department of Social Protection (DSP) Statement of Strategy to commit to being a literacy friendly department in your:

- communications;
- services to the public; and
- employment supports.

We welcome the good work that the department has already done to be literacy friendly, and we have made eleven recommendations for how you can build on this.

Contact

We are happy to discuss our comments and recommendations further.

Aoife Crawford
Research and Policy Officer
Tel: 01 412 7919
Email: **acrawford@nala.ie**

References

Central Statistics Office (CSO) (2013). **PIAAC 2012: Survey Results for Ireland from the Programme for the International Assessment of Adult Competencies**.

CSO (2024). **Programme for the International Assessment of Adult Competencies (PIAAC) 2023**.

Department of Public Expenditure and Reform (DPER) and National Disability Authority (NDA) (2023). **Customer Communications Toolkit for Services to the Public: A Universal Design Approach**.

Department of Social Protection (2023). **Statement of Strategy 2023-2026**.

Department of Social Protection (2022). **Statement of Digital Strategy 2022-2025**.

Department of the Taoiseach (2022). **Harnessing Digital: the Digital Ireland Framework**.

European Commission (2024). **Ireland 2024 Digital Decade Country Report**.

Gov.ie (2024). **Gov.ie Style Guide**.

Government of Ireland (2023). **European Union (Accessibility Requirements of Products and Services) Regulations 2023**.

Government of Ireland (2025). **Draft Programme for Government 2025: Securing Ireland's Future**.

International Organization for Standardization (ISO) (2023). **Plain Language – Part 1: Governing Principles and Guidelines. ISO 24495-1:2023**.

International Plain Language Federation (webpage, accessed 27 February 2025). **The ISO plain language standard**.

National Adult Literacy Agency (NALA) (2012). **Guidelines for Good Adult Literacy Work**.

SOLAS (2020). **Future FET: Transforming Learning**.

SOLAS (2021). **Adult Literacy For Life: A 10-year Adult Literacy, Numeracy and Digital Literacy Strategy**.

United Nations (UN) (2015). **Transforming our World: the 2030 Agenda for Sustainable Development**.

About NALA

The National Adult Literacy Agency (NALA) is a charity and membership based organisation. We support adults with literacy, numeracy and digital literacy needs to access learning opportunities that meet their needs and to take part fully in society. NALA does this by raising awareness of the importance of literacy, doing research and sharing good practice. We also provide support through our online learning courses, tutoring service and by lobbying for further investment to improve adult literacy, numeracy and digital literacy skills.

National Adult Literacy Agency (NALA)

Sandford Lodge

Sandford Close

Ranelagh, Dublin 6

D06 YF65

Freephone: 1 800 20 20 65

Email: info@nala.ie

Registered Charity Number: 20020965

Charity Number: 8506

Company Number: 342807

Websites:

nala.ie

learnwithnala.ie