



A detailed analysis and review of select ATO communications

To determine whether the ATO is meeting its obligations under its Charter to provide timely, easy-to-understand and accessible information

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Executive summary

The ATO Charter establishes a clear obligation to provide "timely, accurate, clear and complete" information to help Australians understand their rights and obligations.

The initial assessment (submitted mid-May) examined multiple pairs of ATO notices against these communication standards, identifying both strengths and areas for potential improvement.

Then, following a thorough review of that draft opinion by ATO experts, their fact checking as well as insights into technical details and operational context were carefully reviewed and integrated, enhancing the accuracy and practicality of this final report.

The collaborative process has arguably strengthened the findings and ensured this final draft opinion aligns with:

- best-practice communication principles associated with readability, inclusivity, plain English writing, and content design conventions
- the practical constraints and objectives of the ATO.

The result is a final report that offers actionable insights grounded in both external review and internal expertise.

Note: In some instances, the ATO reviewer's comment has been included in this document with my response and rationale documented via a footnote.

Current compliance strengths

The ATO demonstrates several positive communication practices in its notices. Documents consistently include structured sections for key information, clear contact options, and generally logical organisation of content.

For the most part, the supplied notices successfully communicate essential tax information while maintaining a predominantly professional tone, albeit with undue formality at times. Formatting elements such as tables, headings, and boxed sections attempt to organise complex numerical information, and the documents include support options for taxpayers experiencing difficulties.

Areas for improvement: an overview

Despite these strengths, various aspects of the 3 pairs of ATO communications reviewed arguably fall short of charter obligations for "clear and actionable" information. The most significant challenges include:

1. **Accessibility and readability barriers:** Dense information presentation, complex sentence structures, and technical language create substantial barriers for taxpayers with lower literacy levels or non-English speaking backgrounds. (P.7ff)

While acknowledging taxation terminology inherently contains necessary jargon, thus negatively impacting such scores, reading levels consistently exceed recommended grades of 8-9, even in more generic, non-jargon contexts. This requires advanced education to fully comprehend the full narrative.

2. **Inconsistent design:** Formatting inconsistencies across documents can disrupt the user experience, with varying approaches to headings, tables, and highlighted information creating unnecessary cognitive load and potential confusion. (P.14ff)
3. **Cultural inclusivity gaps:** Documents focus primarily on procedural compliance without acknowledging cultural differences in financial literacy or tax understanding, potentially disadvantaging Australia's culturally diverse population. (P.10ff)
4. **Plain English violations:** Extensive use of passive voice, complex noun phrases, abstract language, technical jargon (sometimes unavoidable), and inconsistent pronouns contradicts established plain English principles and impedes comprehension. (P.12ff)
5. **Problematic content design:** Calculation tables, information hierarchies, and visual structures often obscure rather than clarify information, making it difficult for taxpayers to:
 - navigate the document as a whole
 - identify key actions and
 - understand consequences. (P.14ff)

Compliance assessment

While the notices effectively convey legally required information, they frequently do so in a manner that imposes unnecessary barriers to comprehension and action for considerable segments of the population.

The ATO can enhance its Charter compliance by:

- applying plain English principles more consistently, even in contexts where it is acknowledged that many recipients of certain communications are assumed to:

“have a higher level of financial literacy, are more sophisticated financially or have more capacity to seek financial advice¹.”

- adopting user-centred content design practices
- addressing cultural inclusivity
- developing more accessible communications.

These changes aim to:

- meet Charter obligations more effectively
- improve taxpayer compliance
- decrease support burden and costs through clearer and more actionable communications.

¹ Comments from ATO on draft opinion explaining additional contextual information.

Author’s response: That said, a minority of readers will still fall outside this working assumption. What recourse might they have? What options could be crafted to ensure they are also supported? The principle that clear communication is universally beneficial holds true, even for financially literate individuals. This approach isn't about diluting the message, but about ensuring it's inclusive to, and understood by, the widest possible audience.

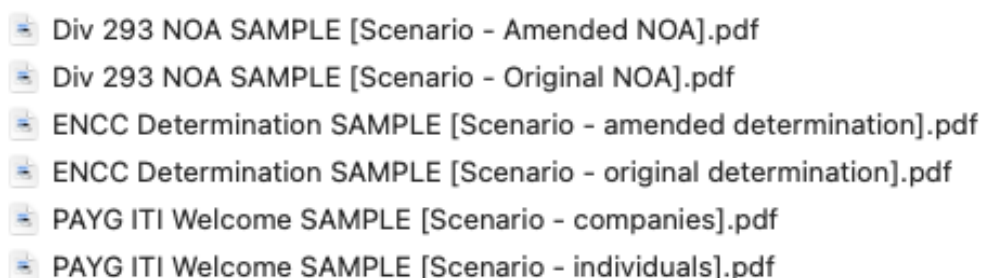
Introduction

Project background and objectives

The Australian Taxation Office (ATO) is responsible for administering Australia's tax and superannuation systems. A crucial component in this is the issuing of clear and effective communication with taxpayers. The quality of these communications directly impacts taxpayer understanding, compliance, and satisfaction with government services.

This review was commissioned to assess current ATO communications and provide recommendations for improvement. The primary focus was on making tax information more accessible and actionable.

The analysis examined 6 key ATO documents commonly sent to taxpayers:

- 
- Div 293 NOA SAMPLE [Scenario - Amended NOA].pdf
 - Div 293 NOA SAMPLE [Scenario - Original NOA].pdf
 - ENCC Determination SAMPLE [Scenario - amended determination].pdf
 - ENCC Determination SAMPLE [Scenario - original determination].pdf
 - PAYG ITI Welcome SAMPLE [Scenario - companies].pdf
 - PAYG ITI Welcome SAMPLE [Scenario - individuals].pdf

Methodology

The assessment focused on 4 core dimensions:

1. **Readability** - Assessing sentence structure, vocabulary complexity, document organisation, and overall clarity
2. **Inclusivity** - Ensuring communications are accessible to people of diverse backgrounds, abilities, and literacy levels.
3. **Plain English writing principles** - Use active voice, concrete language, suitable tone, and clear action steps.
4. **Content design** - The deliberate use of visual hierarchy, spacing, typography, colour, and other elements to improve understanding and guide readers.

In addition, each document was analysed (not benchmarked) against various standards for government communications, including:

- Australian Government Style Manual guidelines
- Plain English Foundation standards
- International best practices for tax communications, including the UK HMRC Plain English Initiative; the New Zealand Inland Revenue Digital Transformation project; and the Canadian Revenue Agency Service Modernisation program.

Review findings

Readability issues and fixes

1. Complex sentence structure

Many sentences are overly long and complex, particularly when explaining calculations or technical concepts. This can create barriers to understanding.

The 23-word original sentence (see table below) contains multiple concepts that would be easier to understand if broken down. For the most part, breaking dense information into shorter sentences – even though word count may increase – can:

- make each concept easier to grasp
- assist with information retention
- create a logical narrative flow
- improve readability while maintaining all the essential messaging.

ORIGINAL (Div 293 NOA amended)	REVISION
There is an additional tax on super contributions which reduces the tax concession for individuals whose combined income and contributions are more than the \$1,000 threshold. (Readability score 18)	You may need to pay an additional tax on your super contributions. This applies when your combined income and contributions exceed \$1,000. This extra tax reduces the tax benefits you would normally receive on your super. (Readability score 10)

Q. What is a readability score, and why this matters?

Readability scores measure how easy a piece of writing is to read and understand, often based on sentence length and word complexity. The reading or index number corresponds to an education level or reading age.

A Gunning Fog score of 10, for example, merely indicates a reader needs to have 10 years of schooling to comfortably make sense of the writing in a single reading.

For writers and editors, these scores provide a quick, objective way to assess whether content is suitable for its intended audience. For public-facing communications, aiming for scores that correspond to grades 8-10 typically ensures most adults can understand the content.

They help identify when language is too complex, encouraging adjustments to make information clearer, more accessible, and easier to act on.

This is especially important because when organisations like government agencies must communicate with diverse audiences or the public, readability scores provide measurable evidence of compliance efforts.

2. Passive voice overuse

The documents frequently use passive voice, making them less direct and more difficult to follow. Passive constructions like "is the result of" make content less engaging and harder to understand.

ORIGINAL	REVISION
The change in your deferred amounts is the result of changes to taxable defined benefit contributions.	Your taxable defined benefit contributions have changed, which directly affected your deferred amounts.
Your excess non-concessional (after tax) contributions in the 2023-24 financial year have changed from \$55,000.08 to \$0.08 as we have received updated information	We updated your excess non-concessional (after tax) contributions for 2023-24 from \$55,000.08 to \$0.08 after receiving new information.
Your taxable super contributions are only those Division 293 super contributions that are above the threshold.	We'll only tax the super contributions that are above the Division 293 threshold. Note the conscious use of contractions. We will/we'll

3. Dense information presentation

The calculation tables showing Division 293 income, while organised in a tabular or workflow format, still presents complex information with minimal explanation. Not helped by alphabetic references with little context. See below.

This is an amendment to your Division 293 tax assessment for the year ended 30 June 2016.			
Your additional tax (Division 293 tax) is 55% of your taxable super contributions. Your taxable super contributions are only those Division 293 super contributions that are above the threshold.			
Division 293 income (see below)		\$200.00	(a)
Division 293 super contributions (see below)		\$900.00	(b)
Combined income and super contributions	(a) + (b)	\$1,100.00	(c)
Less the Division 293 threshold		\$1,000.00	(d)
Amount above the threshold	(c) - (d)	\$100.00	(e)
Amended taxable super contributions	the lesser of (b) or (e)	\$100.00	(f)
Previous taxable super contributions		\$100.00	
Change in taxable super contributions		\$200.00	
AMENDED ADDITIONAL TAX	(f) x 55%	\$55.00	
PREVIOUS ADDITIONAL TAX		\$300.00	
CHANGE IN ADDITIONAL TAX		\$355.00	

Potential issues at play:

- Heavy reliance on prior formula references (*b* or *e*), assuming the reader is tracking previous line items.
- Dense numerical information without contextual references to help understand the relationship between figures.
EG. The numbers in brackets at the end of the line might have greater impact if referenced immediately beside the prose line item: Division 293 income (a)
- The "Change in taxable super contributions" shows \$200.00, but this relationship to the amended amount of \$100.00 isn't clearly explained.
- A 55% tax rate is mentioned without explanation of why this rate applies, or how it differs from other tax rates., which could cause taxpayer anxiety and uncertainty.

4. Inconsistent formatting

Formatting of headings, subheadings, and highlighted information varies between documents, creating an inconsistent user experience. For example:

- Some documents use bold text for subheadings
- Others use colour without bold for the same level
- While others use reversed (white on dark blue) headings for section titles while another doc uses the same style but with different spacing.

In addition, there is variability in action language.

- Some notices say, "You must..." while others say, "It is easiest to..." or "Consider...".

This can create confusion about whether a step is mandatory, optional, or just advice.

Without standardised language for obligations vs. options, the user experience can feel unpredictable and unclear.

Sideline observation: Div 293 notice

This is a question the way it's currently worded.

How have we calculated the amount of additional tax to defer

The change to your additional tax deferred is based on the change in taxable super contributions your defined benefit funds.

Alternatives could be:

- How we calculate your deferred tax amount
- How the amount of additional tax to defer was calculated
- Calculating the amount of additional tax to defer

Inclusivity issues and fixes

1. Assumption of technical knowledge

The documents assume substantial prior knowledge of tax terminology. And the lack of in-situ explanatory context or links (or tooltips on mouseover for online viewing) to supplementary information can pose huge challenges to low literacy and culturally diverse readers.

We disagree with this statement as all templates reviewed contain links to additional information².

Plus, dense formatting can be challenging for readers with visual impairments or cognitive difficulties.

Terms like "Division 293 tax³," "concessional super contributions," and "defined benefit funds" are used without clear explanations in-situ.

The resulting cumulative load on readers challenges them to continuously digest and comprehend the essence of the messaging and any actions needed.

2. Limited accessibility considerations⁴

While some contact alternatives are mentioned (National Relay Service, Translating and Interpreting Service), the overall design of the documents doesn't fully support accessibility needs:

- Small font sizes in some sections
- Complex tables that may be difficult to navigate with screen readers when accessing documents using secure digital channels.⁵
- Limited use of plain language alternatives for technical terms.

² Comments from ATO on draft opinion.

Author's response: Each pair of documents labels this support section differently: 'Need help?', 'Further information', or 'For more information.' This variation extends to its formatting, which appears in 3 distinct ways. Furthermore, its placement differs across documents. This **notable absence of consistency** can be a significant usability issue, as highlighted in the content design critique elsewhere in this final draft.

³ Comments from ATO on draft opinion assert the term is explained in situ. I disagree. There is no explicit reference to a Division 293 definition. It is assumed taxpayers without a clear understanding must 'join the dots' between various headings and prose sentences. A clear explanatory box at the top would solve this for everyone.

⁴ ATO feedback: "We have accessibility testing results demonstrating WCAG compliance."

Author's response: Two separate PDF checkers returned a FAIL because the 'StructTreeRoot entry is not present in some of the documents' catalog'. Individual elements might be labelled but under WCAG 1.3.1 (Info and Relationships) and possibly 4.1.2, PDFs without a StructTreeRoot entry will be flagged as untagged.

⁵ This bullet point retained. See evidence in footnote 4 above.

3. Insufficient cultural inclusivity

While these ATO notices are assumed technically correct and procedurally clear for those familiar with the Australian tax system, they don't often account for the reality that many people from different cultural backgrounds have little to no prior experience with concepts like superannuation, tax thresholds, or voluntary compliance systems.

"Clients are regularly encouraged to visit ato.gov.au to access additional information where it is available in a range of alternative formats that cannot be delivered through correspondence products.⁶"

Language that's heading in the direction of being more inclusive

"Our records show you've put more after-tax money into your super than the government allows for this year. You have 2 options for what to do next.

If you're unsure, visit ato.gov.au/supercaps or call us for advice in your language. If you don't make a choice by [insert date], we'll automatically apply the standard option for you."
(Readability score 9)

One last thing on inclusivity

Consider consolidating the support section with more consistent formatting, and place higher in the notices.

A consideration of tone on the PAYG notice

While emphatic language can be direct and unambiguous, consider reframing language to make it more empathetic:

Instead of "you must do this before the due date," you could say "be sure to do this before [date] to avoid penalties."

⁶ Excerpt of comments from ATO on draft opinion.

Author's response: Not all clients have English as their first language, nor Internet access, nor are technically proficient at navigating the complex information architecture that is ato.gov.au with any degree of confidence.

A disclaimer like "... visit ato.gov.au to access additional information ..." may not be a viable or realistic option for these already marginalised culturally and linguistically diverse (CALD) cohorts.

Issues with plain English writing principles

Plain English breaches are closely related to the readability issues already referenced above. The combination of jargon, complex sentence structures, and passive voice, all increase cognitive load for the reader.

Those issues, when added to the list below, leads to dense, hard-to-scan content that risks obscuring key information thus making it harder for users to quickly understand actions and consequences.

Addressing plain English principles naturally improves readability by promoting clarity, simplicity, and a stronger visual hierarchy.

1. **Abstract rather than concrete language**

“Depending on your account balance, this may result in your super account(s) being closed and any associated insurance policies being cancelled.”

This statement:

- Uses the abstract phrase "may result in" rather than stating concrete outcomes
- Mentions "associated insurance policies" without specifying what these are
- Fails to provide specific examples of consequences
- Creates uncertainty about what will happen.

The abstract phrasing leaves the reader uncertain about the real-world impact. Will they lose life insurance coverage? Disability insurance? How would they reinstate coverage if needed? The abstract language obscures these concrete consequences.

2. **Inconsistent pronouns**

Switching between "we," "you," and passive constructions can create confusion about who is responsible for what actions. Plus, it:

- **Obscures agency:** Readers may not understand who is acting (Is it me or the ATO?).
- **Blurs obligations:** Switching between you must and passive language like “It is required...” dilutes clarity around what actions the reader needs to take.
- **Feels impersonal and bureaucratic:** This undermines the goal of approachable, service-oriented communication.

A note about conditional clauses with multiple factors

EG. This 42-word sentence in the ENCC Determination notice has a lot going on.

"If we have exhausted all amounts from your super accounts and your only super interest left is held in a Defined Benefit Fund and the fund cannot or will not voluntarily release, we will send you an excess non-concessional contributions tax assessment." (Readability score ~24)

Slightly better below, but you get the picture. With more time, we could do better.

"If there's no money left in your super accounts and your remaining super is in a Defined Benefit Fund that won't release funds, we'll send you a tax bill for your excess after-tax super contributions." (Readability score ~18)

Continuous improvement looks like this:

"What happens if you have no super money left? If your only remaining super is in a Defined Benefit Fund that won't release money, we'll send you a tax bill. This applies to excess after-tax super payments." (Readability score ~9)

This is not dumbing down content. Rather, it's opening the messaging up to the widest possible audience. That's a big tick for:

- √ Inclusivity
- √ Readability
- √ Accessibility


Content design issues and suggested fixes

1. Poor visual hierarchy and prioritisation

Critical information (payment amounts, due dates, next steps) is missing sufficient visual emphasis, with inadequate differentiation between headers, sub headers, body text, and background information.

- **Headers lack visual distinction:** In both Division 293 notices, the critical explanation section "Why have we amended your additional tax" uses the same styling as less important sections. See full page snippet below for context.
- **Key information isn't highlighted in summary or call-out boxes:** There's also no clear visual hierarchy; headings and important text don't stand out. Users might rank 'What you need to do now' as the most important element to them. But without sufficient 'content design' cues to guide them, this crucial info blends into other paragraphs making it difficult to assess the available options and important (at least to the reader) next steps.

~*- Demonstration Powered by OpenText Exstream 12/08/2023, Version 16.6.21 64-bit ~*-



Australian Government
Australian Taxation Office

Our reference: [REDACTED]
Phone: 13 10 20
Website: ato.gov.au/division29
ABN: [REDACTED]
4 April 2021

Additional tax on concessional contributions (Division 293) amended notice for 2015-16

Dear [REDACTED]

There is an additional tax on super contributions which reduces the tax concession for individuals whose combined income and contributions are more than the \$1,000 threshold.

The additional tax previously calculated on your concessional super contributions has been amended.

Why have we amended your additional tax

The amounts in your income tax return for the 2015-16 financial year have changed. This changes the calculation of additional tax we previously sent you on 5 May 2015.

How has your additional tax calculation changed

There is no change to the total amount of additional tax you owe. However, there is a change to the amounts for each of your defined benefit funds where payment has been deferred.

What you need to do now

The change in your deferred amounts is the result of changes to taxable defined benefit contributions. The additional tax on these contributions does not need to be paid now, see over the page for further details.

The reduction in additional tax on your contributions that have decreased is **\$2,145.00**. This amount has been credited to your Division 293 deferred debt account.

The additional tax on your contributions that have increased does not need to be paid now. Payment of **\$5,002.00** has been deferred until you take your end benefit.

These amounts are in addition to deferred amounts we have previously advised you of. For full details of your accounts with us visit our website at ato.gov.au/online services, see the final page for further information.

HOW TO PAY

Your payment reference number (PRN) is: The unique PRN for each amount shown in this notice

BPAY®

Bill code: 75556
Ref: for PRN see above

Telephone & Internet Banking – BPAY®

Contact your bank or financial institution to make this payment from your cheque, savings, debit or credit card account.
More info: www.bpay.com.au

CREDIT OR DEBIT CARD

Pay online with your credit or debit card at www.governmenteasypay.gov.au/PayATO

To pay by phone, call the Government EasyPay service on **1300 896 089**.

A card payment fee applies.

For other payment options, visit ato.gov.au/paymentoptions

RELEASE MONEY FROM SUPER

You can ask your fund to pay some or all of the amount from your existing super balance. To do this, access our online services through myGov and complete the Division 293 election form.

You may not be able to pay in this way from your defined benefit super balance, check with your fund before completing the election form.

E00000 S00000 F30705 Page 1 of 4 74521.501170 06 2019

That said, the original Div 293 version does adequately render crucial data in a better hierarchy of information. But the crucial 'next steps' section could be more visually enhanced for a better user experience.

Why does the additional tax apply to you

For the 2023-24 financial year, your combined income and super contributions were more than \$250,000. This means you now have to pay an additional tax of 15% on your concessional contributions.

How much additional tax do you need to pay

Your additional tax for this notice is:

Taxable super contributions	\$22,887.21
Additional tax due and payable	\$3,433.05
Due date for payment	09 December 2024

Your Payment Reference Number for this amount is: [REDACTED]

What you need to do now

There are two options for making a payment (your payment can be made using any combination of these):

1. Pay with your own money
2. Elect to release money from any of your existing super balances by completing a Division 293 election form online, instructions to do this are on the final page of this notice.

2. Weak action-oriented elements

- **Action items and deadlines often buried in text:** In the PAYG notices, critical actions like "You must do this before the due date" are embedded in regular paragraphs (in bold) rather than highlighted with more visual or spatial emphasis.

Calculating the amount you pay

As a PAYG instalments payer, you can choose from one of two options to work out how much to pay, which will apply for the income year. We will include these options on your BAS or instalment notice. You need to make your choice before the due date of your next quarterly BAS or instalment notice.

Option 1 - Instalment amount

We calculate the instalment amount using the business and investment income from your latest tax return. The benefit of this method is that you will know the amount you need to pay each quarter, without having to work it out yourself. This can help you plan and budget for the payment.

Option 2 - Instalment rate

This option allows you to calculate your PAYG instalment amount based on your actual income for that period, multiplied by a rate we provide you. Your instalment rate is **1.72%**. The benefit of this method is that your instalments are based on your income as you earn it, instead of an estimate based on your latest tax return. You may prefer this method if your income changes throughout the year.

You can find more information about these options on our website at ato.gov.au/paygioptions

What if your situation changes

If your circumstances change, you can vary your PAYG instalment. **You must do this before the due date.** You may also be eligible to exit the PAYG instalments system.

You can find more information about varying instalments or exiting the system on our website at ato.gov.au/paygi

How might this be addressed?

Add a summary box or similar at the top, where relevant, showing the crucial contextual issue. Include any payment deadlines and/or actions required, for example.

Here's a very rough mock up. Please disregard any factual errors; it's not the words being illustrated; just the content design potential.

Our reference: 7154725599830
Phone: 13 10 20
TFN: XXX XXX XXX
Date: 1 December 2024

Action Required: You've exceeded your super contribution limit

You need to make a decision about your excess super contributions by **2 February 2025**.

What you need to do

- 1 Read this notice to understand your options
- 2 Choose how to handle your excess contributions (Option 1 or 2)
- 3 Tell us your choice using myGov by **2 February 2025**
- 4 Lodge your 2023-24 tax return (even if you don't normally need to)

What's happened?

In another context, this time in the ENCC notices, dense paragraphs of bullet points all look visually similar, making it difficult to identify default versus optional actions.

How might this be addressed with a bit of content design magic?

```
graph TD
    A[YOUR OPTIONS] --> B[DO NOTHING (EASIEST)]
    A --> C[CHOOSE AN OPTION  
(By February 16, 2025)]
    B --> D["We will:  
• Withdraw $63,053.83 from your super  
• Amend your tax return  
• Pay your debts  
• Refund any remainder"]
    C --> E[OPTION 1  
Tell us which fund]
    C --> F[OPTION 2  
Pay 47% tax ($25,850.03)]
```

This decision-tree flowchart:

- Makes the 'do nothing' default much clearer
- Shows the deadline for only those who need it
- Creates visual distinction between paths
- Reduces text density while maintaining all the key information.

Comparing the pairs

Examining the 3 document pairs revealed additional insights about how templates adapt (or not) to different scenarios.

Division 293 notices

Both documents share similar issues despite covering vastly different time periods:

- Complex calculations presented without visual aids or examples.
- Critical due dates not prominently displayed on the amended notice but well defined on the original.
- Minimal personalisation despite different taxpayer circumstances.

Potential fixes include:

- Create a simplified overview explaining why the amendment occurred.
- Add a visual timeline showing original assessment and amendment.
- Reorganise payment options into a clearer decision tree.
- Create a checklist for required actions with clear deadlines.

Excess Non-Concessional Contributions notices

The original and amended notices reveal a few problematic concepts for readers:

- The amended notice fails to visually highlight the significant change from \$55,000.08 to \$0.08 excess contribution.
- Both documents require identical decision-making processes regardless of amount significance.
- No prioritisation of information based on relevance to the taxpayer's specific situation.

Potential fixes include:

- Redesign the options section as a clear comparison table or decision tree
- Add visual explanations of the 2 options and their outcomes
- Include a simplified flowchart or decision tree for decision-making (see content design fixes)

PAYG instalment notifications

Now, I appreciate the case for consistency in much of this work. But sometimes there is a case for customisation depending on the circumstances. These notices demonstrate template rigidity across vastly different financial circumstances:

- Nearly identical structure despite significant differences in instalment amounts (\$11,280 vs \$860 quarterly)
- Same level of detail provided regardless of income level or complexity
- Lost opportunity to provide tailored guidance based on taxpayer circumstances.

Potential fixes include:

- Introduce **tiered templates** based on payment thresholds (e.g., small, medium, large instalments).
 - Higher tiers should include additional context about cash flow management and available support options.
 - For lower tiers, simplify language and reduce unnecessary technical detail.
-

ATO expert's comments

Financial impact doesn't always equate to taxpayer need.

A policy that intentionally limits information based on financial thresholds could be seen as inconsistent with the commitments in the ATO charter...

Author's response

Appreciate the explanation regarding the strategy for PAYG notifications. And while I recognise the internal drivers for consistency, my review focused on the *external* user experience.

The suggestion of tiered templates was put forward as a potential way to further enhance the effectiveness of these communications. By tailoring content based on instalment thresholds, you could potentially achieve:

- **Increased clarity:** Simpler versions for those with lower amounts.
- **Better support:** More context (e.g. cash flow) for those with higher amounts.
- **Reduced enquiries:** By pre-empting questions specific to different financial situations.

While acknowledging the SME's perspective on consistency and the challenges of customisation, one option might be to keep the tiered approach under consideration as a future enhancement. It aligns with broader goals of supporting diverse audiences and making compliance easier.

Qualitative benefits analysis

Implementing clearer, more accessible communications consistently throughout ATO documentation delivers substantial strategic benefits that extend beyond mere readability.

The holistic impact of these improvements creates measurable advantages for both the organisation and more importantly, Australian taxpayers. How?

By transforming how people interact with the tax and super systems while advancing operational efficiency and public service goals.

1. Improved public trust and perception

- Clear, accessible communications help the ATO appear more transparent, fair, and supportive rather than bureaucratic or punitive.
- Empathetic language and plain English writing principles build trust and reduce perceptions of the ATO as an impersonal, complex institution.

2. Enhanced compliance and faster user action

- When obligations, amounts owed, and next steps are easy to understand, recipients are more likely to respond promptly and accurately.
- Fewer delays in compliance reduce the need for follow-up notices and enforcement actions.

3. Reduced inbound enquiries and support costs

- Simplifying instructions and explaining options clearly reduces the volume of calls and online enquiries seeking clarification.
- This translates directly to operational efficiencies and allows support staff to focus on complex cases rather than answering routine questions.

4. Stronger support for vulnerable and diverse audiences

- Plain English helps readers with low literacy levels, culturally and linguistically diverse backgrounds, and those with cognitive impairments.
- Clearly and consistently signposted support options and hardship pathways reduce financial stress and foster a more inclusive service environment.
- Design a standard **Need help?** artefact and place consistently across all notices.

5. Alignment with government policy on accessibility and inclusion

- Adopting plain English is in line with the Australian Government's commitment to accessibility standards, including the Digital Service Standard and the ATO Charter.
- This reinforces the ATO's position as a leader in transparent, citizen-focused government communication.

Appendix

Generative AI usage statement

Both versions of this review were developed through a collaborative process combining human expertise with minimal use of generative AI technologies.

Artificial intelligence (AI), specifically the advanced models of OpenAI's ChatGPT and Perplexity, were used as research and discovery tools to assess best practices and current trends in government communication notices.

Apart from assistance with upfront research, AI also contributed to:

- Calculating multiple readability metrics, including Gunning Fog scores of language samples.
- Generating visual content artefacts such as tables, decision trees and other content design recommendations to better illustrate an existing deficiency and proposed solution
- Assisting with the final document QA review.

All data used was either publicly available or de-identified by the commissioning authority for analysis purposes, in accordance with appropriate data handling and privacy considerations.