

The Language Lock-Out: The Research

Prepared by Black Sheep Communications
and Untapped Customer

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Executive summary

This research looked at five prominent NDIS website pages for services relating to two key NDIS service types: home and living, and day and group programs. This report does not name individual providers.

This report is for anyone with a role in managing digital content for a NDIS service. It is also for anyone who wants to understand what this research found.

The research was presented by Tom Davis from Black Sheep Communications and Ann Drieberg from Untapped Customer at the DSC NDIS National Conference in Brisbane on 13 August 2026.

The research used three lenses at once: A technical accessibility audit by Centre for Accessibility, a content design and AI visibility review by Black Sheep Communications supported by AI company Airgentic, and testing with NDIS participants with lived experience of disability by Untapped Customer.

None of the five sites met the plain language standards to meet requirements for the approximate 44% of people with low literacy in Australia. All failed accessibility checks.

Every page tested between Grade 10 and Grade 16 which is university reading grade and beyond the recommended reading grade of seven 12 to 13 years old.

Content structure

Three sites had no main page heading this is a key navigational aid for search engines to find and cite a page. One had no headings at all. Four of the five had no publication date. Screen readers and search engine technology rely on headings to interpret page content for users. Meanwhile AI uses headings as “grounding sources” for the information it presents back to users who may be using AI tools or Google AI overviews.

Another point note that the headings, which are also a navigational source, used marketing language about the organisation and unrelated to the user needs. One site used questions for headings which can increase friction for the user if experiencing stress.

None passed the accessibility standard. No site did well across accessibility, plain language, and being found by search and AI tools. When one of these was strong, another was usually weak.



Each site was checked against a list of technical requirements, covering things like page titles, how images are labelled, and how fast a page loads. The weakest site passed 41% of these checks. The strongest site passed 61%.

Testers were also asked to give an overall rating for each site, a choice of Good, OK, or Not Good. Most still answered Good. The site with the lowest technical score was rated the same as the site with the highest. None of the technical problems showed up in these ratings.

A website is often a person's first contact with a disability service. Sometimes it is their only contact, before they decide whether to make an inquiry. More of that contact is now moving through AI tools, not a search results page. The same barriers that stop a person can also stop a service from being found by AI.

We encourage providers to adopt controls and check their website regularly and establish a governance structure for content management. "Baking in" accessibility and lived experience with real users to design and test products is highly recommended.

Content governance reduces risk by making sure the site's basic technical setup, headings, structure, and code, matches how search engines, assistive technology, and AI tools actually read the page.

Providers already carry out continuous improvement and governance under the NDIS Practice Standards. A website can be part of that work.

Adopting the [ISO Plain Language Standard](#), an Australian Standard in 2024, can give organisations a definition of what "plain language" means. It will also give organisation confidence in creating content that is functional for users and their tasks, not just producing content that is easy to read.

About this research

A website can meet technical accessibility guidelines and still fail the people trying to use it. This research looks at why that happens.

Most of the checks used in this research work against a fixed checklist. A tool can check whether a sentence is a certain length. It can check whether an image has a written description behind it. This tells you whether a page meets a standard. It does not tell you whether a real person can use the page. That is why this research also asked real people to try each site directly, and describe what happened.



Three organisations reviewed five NDIS provider websites together. Each one brought a different kind of expertise.

Centre for Accessibility checked the sites in line with [Web Content Accessibility Guidelines \(WCAG\)](#). These are the international rules for making websites accessible.

Untapped Customer tested how people with disability experience each site. This included people with cognitive, sensory, and physical disabilities.

Black Sheep Communications checked the writing in line with the ISO Standard for Plain Language, the Australian style manual's recommendation for grade seven writing and best practice content design principles.

They looked at how functional the content is, how easy it was to read, and how well it works for search engines and AI tools, thanks to support from AI company Airgentic.

Bringing these three organisations together for the research shows what one view alone would miss.

A technical check can pass, but the page can still be hard to read or impossible to navigate.

This research checked all three, technical accessibility, plain language, and real use, together.

It looks at patterns across the websites reviewed.

This research forms the evidence base for the Language Lock-Out keynote at the 2026 Annual NDIS Conference.

How we did it

Each organisation reviewed all five websites. The technical audit checked every site against the same rules. The reading review checked every site against the same target. Testers were asked the same questions about every site.

The Centre for Accessibility ran an automated technical audit. They used two tools, WAVE and SortSite. These tools checked each site against the WCAG 2.2 standard, at Level A and Level AA.

It covered colour contrast, image alt text, link and form labels, keyboard focus, and heading



structure. Automated tools cannot catch every accessibility issue on their own. This part of the review focused on the barriers these tools are designed to check for.

Untapped Customer asked people with disability to use each site. They then rated it and described their experience. Testers included people using screen readers, magnification, and captions, as well as people with autism, AuDHD, and intellectual disability. Each tester rated their overall experience. They also described, in their own words, what helped and what got in their way. This covered things like how easy a service was to understand, and how easy it was to make an enquiry or contact the provider.

Black Sheep Communications checked the writing on each page and how content design functioned in line with the intended user task.

This included the reading level, sentence length, and how much jargon was used. They also checked how well each page appears in search engines and AI tools. This affects whether someone can find a service at all.

Each organisation gave a written summary of findings for each provider, with real examples as evidence. Each also gave recommendations for improvement.

What we found

Across all five websites, no provider fully met every standard checked in this research.

The content review found that none of the five sites met the plain language reading target.

It also checked basic technical details, things like page titles, descriptions, and structured data that help a page get found and trusted online. The weakest site was missing more than half of these details. The strongest site was still missing close to two in every five. No site had strong search and AI readiness and strong plain writing at the same time. When one was strong, the other was usually weak.

The technical audit found that none passed the accessibility standard, which covers images, contrast, links, and keyboard navigation.

When real people tested each site, every one of them was rated OK to Good. But those same testers described barriers when they used the site. Things like losing their place on a page, links too faint to read, images with nothing describing them.

The sections below set out what each of these checks found.



Reading level and plain language

The reading level target for this sector is Grade 6 to 9. This is the number of years of schooling a reader needs to follow the text with ease. None of the five sites met it. Scores ranged from Grade 10.9 to Grade 15.9, with long sentences the main cause. The longest single sentence was 63 words.

Key information about events was buried in dysfunctional PDFs on one site. The key user task to access a booking form was buried at the bottom of a page, approximately six scrolls down the page in desktop view – longer in mobile.

Two different checks looked at the same question, was the website content easy to read. Testers said the webpages felt easy to read. The content review used a different method, running the actual words through the reading level calculation above. People said easy. The calculation said hard. Easy to read doesn't always mean the user was able to complete their task.

Images and alt text

Alt text is a short-written description added to an image, so a screen reader can read it aloud. The target score for this sector is 80 or higher out of 100. All five sites failed, with scores ranging from 4 to 52. This is also a fail against the WCAG 2.2 accessibility standard.

On one Supported Independent Living webpage, whole sections were built around photos of available homes. For a person using a screen reader, there was nothing describing what any of them showed.

On another site, some images only had a number as their description. Numbers like 10, 21, or 27. There was no real explanation of what the image showed. A screen reader reads these numbers aloud exactly as they appear. That gives the listener no useful information at all. It is also good web practice to file web images properly with file names which can be read by search engines and AI.

Colour contrast

Colour contrast was the most frequently identified issue in the technical audit, appearing far more often than any other problem checked. On one site, a donate button used white text on an orange background, giving a contrast ratio of 2.02. The accessibility standard requires a ratio of at least 3.0 for large text like this, and 4.5 for smaller text.

On the same site, someone using screen magnification described the links inside a help section as hard to read against the background. They said the links became even harder to see when they tried to hover over one to click through.



Low contrast makes text hard to read for anyone with low vision, and for anyone using a screen in bright light or on a small phone screen.

Links that don't say where they go

Screen readers rely on a link's accessible name to tell someone where clicking it will take them. Across the five sites, this was the third most common issue found. One used "click here" which assumes a mouse click, which excludes people using touch, keyboard, or voice navigation to get around. This also tells search engines and AI tools nothing about where the link goes, hurting both search engine optimisation (SEO) and how well AI tools can read and summarise the page.

Several links were built only from an icon or a small image, with no text behind them at all. For someone using a screen reader, this meant hearing nothing useful, or hearing the raw web address instead of a real description.

Page structure and headings

Screen readers rely on clear headings to help someone move around a page. Three of the five sites had no main heading. One site had no headings at all. Four of the five had no date showing when the page was last updated.

On one site, clicking a menu opened content somewhere else on the page instead of right where you'd expect it. This meant people lost their place and had to start their search over from the top.

Keyboard navigation

Some sites use a visible outline to show which link or button is currently selected. On several sites, this outline had been hidden or removed. This caused a problem for someone using only a keyboard, without a mouse. It becomes very hard to tell where they are on the page.

Missing sources

Not one of the five sites linked to a primary source to back up its claims. Three sites had no external links at all. This makes it harder for a reader to check a claim for themselves. It also affects how well an AI tool can trust and repeat the page's content when someone asks it a question.



When good technique and good writing don't happen together

Across the five sites, no provider scored well on every front at once, search and AI readiness, plain writing, and accessibility. One site had the strongest search and AI readiness. Its pages loaded fast, and had complete page information and structured data. But this same site's writing was the hardest to read of the group. It also had real accessibility problems, found in a separate audit, including poor colour contrast and images labelled with only a number.

Another site had the opposite problem. Its writing was the clearest and simplest of the five, the only site inside the plain language target. But it was missing basic search and AI readiness foundations. It had no main heading and no page description. There was nothing to help a search tool understand or trust the page.

- **A technical audit** can show whether a page meets an accessibility standard. It cannot show whether someone can use the page.
- **A readability and AI visibility check** can show how simple the sentences are, based on things like sentence length and word choice. It cannot show whether someone understood enough to act on them.
- **Usability testing** can show what got in someone's way while trying to use a page. It cannot tell you whether the page meets a technical standard, or a reading target.

Technical and readability checks can each pass while a page still does not work for someone. Usability testing shows that directly. But usability testing alone does not tell you whether the page also meets an accessibility standard or a reading target. This research used all three, to know what happened and why.

How online search is changing

More people are searching for services through AI tools, not just typing a web address or scrolling through search results. AI tools read a page the same way this research measured it, through its words, its headings, its links and its image descriptions.

This is what Inclusive Design means in practice today. Content built for a person using a screen reader is often the same content an AI tool can read and trust.

A short sentence is easier to read, and easier for an AI tool to quote correctly. A described image serves a screen reader and a search tool at the same time.

None of the five sites in this research were set up to be found or trusted this way. Missing alt text, missing headings, and missing sources do not just make a page harder to use. They make a page harder to find in the first place.



Being found and being usable are different problems, but they share the same fixes. Plain language, clear structure, and described images help a person and an AI tool at the same time.

None of this happens by accident. None of it stays fixed on its own. It needs ongoing attention, the kind Digital Governance is about, folding a website into the continuous improvement and risk work providers already do

What providers can do

This research found several fixes a provider can make:

1. **Describe images** when they are uploaded. Most website platforms already have a field for this. It just needs a short sentence describing what the image shows.
2. **Use real heading styles**, not bold text. A heading dropdown is usually built into the page editor. Typing something bigger and bolder by hand looks the same to a sighted reader, but means nothing to a screen reader or an AI tool.
3. **Write a link text** that says where it goes. Swap "click here" for something specific, like "read our NDIS pricing guide."
4. **Adopt the ISO Plain Language Standard** as part of the content governance model to reduce risk and produce functional and easy to read content for humans and AI.
5. **Check new content** against a plain language target before it goes live. Free tools can check this in seconds.
6. **Check colour contrast** before publishing. A free contrast checker takes less than a minute to use.
7. **Add a date to key pages** showing when they were last updated.
8. **Ask someone** outside the day to day running of the site to try one task, and watch without helping. Pick something simple, like finding out how to make an enquiry or a referral. Watch where they get stuck.

None of this happens without ongoing attention through Digital Governance. It means adding a website review to a provider's quality system, and to risk management.



Conclusion

Registered providers must meet Governance and Operational Management Standards as part of their function already. These cover continuous improvement, governance, and risk management. A website and digital products can be included in that work, the same way any other part of the business is.

A website maintenance check or information management review could be added to an internal audit schedule. A provider's websites could also be named directly in a governance and risk register.

This research shows what happens when that kind of attention has not yet reached a provider's website.

Good intentions are not enough on their own. Organisations need clear ownership of digital content, a process for reviewing it and a way of checking that accessibility and plain language standards are maintained over time.

More providers will have their first contact with a person who found them through search engines or AI tools in the future as mainstream adoption increases.

That's why this work matters more, not less. It isn't extra work sitting outside a quality system. It fits inside the work providers already do.

That is what good digital governance means, giving digital content the same ongoing attention as any other part of how a service runs.

Inclusive design is what that attention should produce, content that works for everyone from the start.

Tom Davis and Ann Drieberg August 2026



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