

Your style guide - helping you to get your message across

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Introduction by Jen Green

We all want to communicate well, but it's not always easy to do - particularly as a regulator that deals with complex laws and complex situations.

That's why we launched our new style guide in July 2023 to help our colleagues write clearly, simply and in a targeted way.

It's something that we all need to use in all our writing so that we communicate with impact.

We need you to familiarise yourself with the style guide and apply it to all your writing, whether that's a code of practice and email to a colleague, letters to stakeholders or in our policy writing. It's really important that we all take ownership for the way we write.

We might not always get it right, but the more we use the style guide and the style rules, the more impact our communication will have.

We've split the style guide into two parts, some clear writing standards and style and accessibility rules.

The clear writing standards help us to make sure that our writing is ACE by adding value, being clear and making sure we're empathetic in our writing.

The style and accessibility rules make sure our writing and presentation is accessible for everyone and that we use a consistent style that all our readers can understand, recognise and trust.

You'll find our [style guide](#) on the [Branding and Communications hub](#) on Iris, so don't forget if you have any questions or would like someone to have a look at your work, your manager will be happy to give you some guidance. Thank you.

Clear writing standards

Clear writing leads to better outcomes for you and your readers. Following these standards will make sure your writing is **ACE**:

- **Adding value** – What do you want to achieve? Does your writing have an agreed aim and audience?
- **Clear** – Is your writing clear, concise and consistent?
- **Empathetic** – Are you putting yourself in your readers' shoes? Will readers understand your message?

Adding value

1. Decide what you want to achieve

Consider why you're writing. Decide whether you're writing to inform, persuade, explain, record (or a combination). Establish a clear aim.

Why?

It's easier to get your message across to readers more concisely and effectively if you start writing with a clear aim in mind.

2. Work out exactly who you want to target

You can't write for everybody. It's easier to write for a focused audience.

Use [our audience profiles](#) when you're writing for an external audience to help you think about specific people and what matters to them. These audience profiles are based on real-life people.

Why?

The more focused you can be about who your audience is, the easier it is to write for them.

3. Decide on the level of knowledge your audience has about the subject

Consider what your target audience already know, what they need to know and what's important to them.

Why?

It's important to only give readers the information they need. If the level of their knowledge may vary, make sure readers know who the information is aimed at, so they don't feel you're talking down to them.

Example



If the level of knowledge varies within your audience, it can be difficult to know who to pitch the information to.

You can choose to target the information to the readers who are most important to you. Or target the information to the readers who know the least about the topic and possibly layer the information from introductory through to detailed information.

4. Reach agreement about your aim and audience before you start writing

Everyone involved in the document needs to agree with your aim and audience before you start writing. If this changes during the writing process, you must check that everyone agrees with any changes in scope.

Why?

The more focused you are on your aim and audience, the more impact your writing will have on readers.

5. Talk to one of our Communications teams from the outset about how to get your message across

They can identify what's needed to best connect with your audience and meet your objectives. This includes what type of document or product will work best. They will also look for connections between projects and workstreams.

Talk to [Corporate Communications](#) for writing aimed at people outside our organisation. Read the [communications blueprint](#) to see how they can help you.

Talk to [Internal Communications](#) when writing for colleagues.

Why?

Choosing the most suitable type of document or product from the outset will increase the impact your writing has on readers. Colleagues in one of the Communications teams can advise and collaborate with you most effectively when they're involved at an early stage.

Clear

1. Plan your writing

Before writing, you should have a good understanding of what you plan to produce. This includes its estimated length, structure and layout. Organise your ideas. Think about how to arrange your information in a clear, logical order that's easy for readers to engage with.

Why?

It's much harder to re-think the structure at a later stage and a poor structure makes it harder for readers to follow.

2. Put the key message or conclusion first

Put the most important information at the start and follow up with more detailed explanations. Use this method for structuring sentences, paragraphs and the document as a whole.

Why?

Putting the most important information first quickly tells readers why it's relevant to them and helps them to develop a general understanding before reading about the details.

Example



"Drawing on the good practice themes outlined in the following sections, we have six recommendations for how to design effective privacy choices

and information for children.”

The key message is far more obvious in this:



“We have six recommendations for how to design effective privacy choices and information for children. These are drawn from the good practice themes we’ve outlined in the following sections.”

3. Use chapters, headings, sub-headings, paragraphs, bullet points and boxes to split up text

You must follow the [headings and sub-headings rules](#) and [bullet point rules](#) that are covered in the chapter about style and accessibility rules.

Split up long paragraphs. Paragraphs should ideally have between one to five sentences.

Why?

The structure acts as a series of signposts to ensure even the busiest readers get at least some of the key messages.

Example



“The police can't use that information to make decisions about any of the people involved, or in a way likely to cause substantial damage or substantial distress to them.”

The message is easier to read and understand in this:



"The police can't use that information:

- to make decisions about any of the people involved; or
- in a way likely to cause substantial damage or distress to them."

4. Keep to a single topic per paragraph

Group similar information under one heading and arrange it in a logical order.

Why?

Having separate paragraphs makes it easier for readers to spot each key point.

Example



"Many security incidents can be due to the theft or loss of equipment. You should consider the quality of locks and doors and the protection of your premises by alarms and CCTV. You should also consider cybersecurity, such as the security of your network and the data you hold in your systems."

The message is easier to understand in this:



"Many security incidents can be due to the theft or loss of equipment. You should consider the quality of locks and doors and the protection of your premises by alarms and CCTV.

You should also consider cybersecurity, such as the security of your network and the data you hold in your systems."

5. Avoid repetition

Try to avoid repeating or rephrasing the same idea. In particular, avoid referring back to a point you've previously made before making your new

point.

Why?

Repetition can confuse and distract readers and make it harder to notice the new information.

Example



"Staff found that it was a more effective means of storing information than the current method.

Not only did staff find that it was a more effective filing tool, they also found it easier to use."

The message is clearer and more concise in this:



"Staff found that it was a more effective means of storing information than the current method. They also found it easier to use."

6. Use the active

Change the passive to the active voice, where possible. If you've used a form of the verb 'to be' then it's highly likely that you've written a passive sentence.

Why?

The active is livelier, more direct and it's clearer for readers to understand who needs to take the action and what they need to do.

Example



"Requests should be made in writing."

The sentence is far clearer in the active in this:



"You should make a request in writing."

7. Keep sentences short and straightforward

Each sentence should be ideally up to two lines of text. If you can't delete any of the content, split it up into shorter sentences or use bullet points.

Avoid using separate clauses in the middle of sentences. Keep the subject and the verb close together.

Write read-me-once sentences. If you need to re-read a sentence that you've written to clarify the meaning, then you really need to look at it again and make it clearer for the reader.

If you're finding it hard to express a complex issue in writing, it can help to explain it verbally first.

It's OK to start a sentence with 'but', 'so', 'because' or 'and'.

Why?

Readers can lose track and may miss important messages if sentences are long or complicated.

Example



“Regularly audit your accounts to ensure they are still required and contain the appropriate privileges including ensuring staff have not retained privileges from previous internal job roles that are no longer required and ensuring you document such reviews.”

The sentence is easier to read and understand in this:



“Regularly audit your accounts to ensure you still need them and they contain the appropriate privileges. You should also check that staff have not retained privileges from previous internal job roles that they no longer require. Ensure you document these reviews.”

Example



“A number of policies, for example equality and diversity, and health and safety, will cover both the provision of services and the employment of staff.”

Putting the subject and verb close together makes the message clearer in this:



“A number of policies will cover both the provision of services and the employment of staff, for example equality and diversity, and health and safety.”

8. Use clear, everyday language

Make your language as easy as possible to understand.

Use the simplest words that work rather than unnecessarily complicated or formal ones and avoid jargon.

When writing about the legislation we regulate, use clear and easy-to-understand terminology.

Avoid referring to the exact wording in the legislation in every context.

If you can replace a technical or legal term with clearer language, do. But you must also make sure the message is still correct.

If evidence shows that there's a reader need for including a technical or legal term, you can do so, but consider explaining it in clear language as well. Please discuss this with your manager and [Corporate Communications](#).

You must also follow the [inclusive language rules](#) that are in the chapter about style and accessibility rules.

Why?

There's a wide diversity in our readership and we need to ensure our language is inclusive.

But even when people have a high level of reading skill or understand complex specialist language, they don't want to read it if there's an alternative. This is because they're also likely to be busy people who have a lot to read and want to grasp the important information quickly. You have to compete for their attention, and you don't want to lose them.

For example, [research into use of specialist language](#) in legal documents found:

- 80% of people preferred sentences written in clear English, and the more complex the issue, the greater that preference (eg 97% preferred 'among other things' over the Latin 'inter alia');
- the more educated the person and the more specialist their knowledge, the greater their preference for plain English.

Example

Avoid 'data subject', 'individual', 'citizen'

Use 'people' or 'person'

Avoid 'data controller' (unless you need to clarify whether they're a controller or processor)

Use 'organisation' (or name the organisation)

Avoid 'monetary penalty'

Use 'fine'

Avoid 'personal data' (unless you're using it in a legal context)

Use 'personal information'

Avoid 'processing'

Use 'collecting', 'handling', 'using', 'holding', 'sharing' (as appropriate)

Avoid 'purdah'

Use 'pre-election' period

Example



"The legislation says processing of personal data for statistical purposes does not satisfy the requirement for appropriate safeguards if it's carried out for the purposes of measures or decisions with respect to a particular data subject."

We could try to explain this as:



"Organisations cannot rely on the research provisions if they are using people's information to create statistics, but do this in order to make decisions about a person."

Replacing **data subject** with **person** on its own is clearer language but isn't an accurate explanation of the law. This is because it's still possible to use the statistics to make decisions about other people, in future. However, you can make this easier to understand than reverting to using **data subject**. You could instead say that the organisation shouldn't use the results to make decisions about the **people involved** or the **people whose information was used** (depending on the context of the sentence).



"Organisations cannot rely on the research provisions if they are using people's information to create statistics, but do this in order to make decisions about the people involved."

Example

Avoid 'adjacent to'

Use 'next to'

Avoid 'ascertain'

Use 'find out'

Avoid 'as per'

Use 'in line with, as shown in'

Avoid 'assist'

Use 'help'

Avoid 'commence'

Use 'start, begin'

Avoid 'concluded'

Use 'ended'

Avoid 'co-operation'

Use 'help'

Avoid 'despatched'

Use 'sent'

Avoid 'discontinue'

Use 'stop'

Avoid 'due to the fact that'

Use 'because'

Avoid 'engage'

Use 'talk to, involve, work with'

Avoid 'enhance'

Use 'improve'

Avoid 'further to'

Use 'following'

Avoid 'have regard to'

Use 'consider', 'think', 'take into account'

Avoid 'in respect of'

Use 'about'

Avoid 'in relation to'

Use 'about'

Avoid 'participate'

Use 'take part'

Avoid 'regarding'

Use 'about'

Avoid 'remuneration'

Use 'pay'

Avoid 'undertake'

Use 'do'

Avoid 'utilise'

Use 'use'

Equally, avoid expressions from other languages, in particular Latin, that could be simplified. For example, 'circa' (about), 'de facto' (in fact) and 'ex ante' (before the event).

Also, avoid management speak, for example 'upstream' and 'downstream'.

9. Comply with our style and accessibility rules

You must be familiar with each of these rules and apply them to all your writing.

Read the next chapter of our style guide to learn our [style and accessibility rules](#).

Why?

Readers trust your writing more when you use a consistent style.

It's also a legal requirement to make documents accessible and it's your responsibility to do so. We can help everyone to access and understand our documents by supporting readers with accessibility requirements, such as dyslexia, a learning disability, those with English as a second language or those who access our documents using assistive technology.

10. Edit your writing

Review the structure to check you've arranged the information in a logical order.

Follow the 10% rule that suggests you aim to cut 10% of your first draft. Cut out unnecessary details and only include content that's essential and relevant to your aim. Make sure every sentence helps you achieve it. It's not usually necessary for you to share everything you know about a subject or justify why you're writing.

Cut out unnecessary words. Many phrases can be deleted because they add nothing to the meaning. Equally, some words may only be relevant to certain audiences.

Read your writing aloud or use the Read Aloud tool. This can sometimes reveal some issues, particularly if you've explained a complex topic. It also helps you to check on the tone of voice.

Use the accessibility checker. It will reveal any issues and explain how to fix them.

Consider whether you need to translate your document into Welsh. Read our [Welsh language policy](#) for details.

Why?

It's hard to focus on every aspect of your writing at once, so editing it is crucial. When you write your first draft, you might still be thinking about what you want to say. When you're editing, you can focus more on whether your writing will make the right impact on readers.

Example

Avoid 'blue in colour'

Use 'blue'

Avoid 'comprehensively reviewed'

Use 'reviewed'

Avoid 'Thank you for your letter dated 7 December 2021.'

Use 'Thank you for your letter of 7 December 2021.'

Avoid 'despite the fact that'

Use 'despite'

Example



"We will review our strategic priorities."

Although this is a useful clarification for some audiences, for others this will be sufficient:



“We will review our priorities.”

Example



Only quote a specific provision if the audience needs to know where to find it in the legislation. If you need to quote a specific provision of legislation, use the section, article or regulation number on its own (eg section 1 or regulation 1). If it's in a schedule, use the schedule and paragraph number (eg section 1(1)(a) or schedule 1 paragraph 1).



Don't include which part of an Act (or part of a schedule) it's in. This isn't necessary, as the section (or paragraph) number is enough on its own.

11. Get someone else to take a look

Ask for feedback, even if you can't incorporate all the suggestions. This can help you to identify and revise any parts of your writing that you may need to clarify.

Why?

Getting another opinion makes it easier to check whether readers will understand your writing.

12. Proofread your writing

Check that spelling, punctuation and grammar are correct. It's very easy to rely on spell check and Microsoft Editor but you may mistype a word that spell check would not pick up on. Thoroughly check that your writing and formatting are consistent, especially if more than one author has

contributed.

Why?

Readers will trust your writing less if they spot spelling or grammar errors.

Example



"It's hard to prove a casual link."

The author intended this to read:



"It's hard to prove a causal link."

Empathetic

1. Consider the tone of voice that you use

Use a natural, conversational tone. Write with the authority of someone who can help. Close the gap between spoken and written English.

One way of sounding more informal is to use contractions occasionally, such as 'I'm', 'it's', 'we're' and 'they're'.

Why?

A natural tone of voice makes readers feel more comfortable.

Example



"These PECR rules don't apply to tweets, social media posts, or online ads displayed in someone's social media feed. These ads don't qualify as

electronic mail, because they're not stored for someone to collect – they're just displayed to a user when they log in, based on what's current at that time.”

2. Put yourself in the readers' shoes

Write with empathy. This means making sure you're answering the type of questions or concerns readers may have.

It means writing in a way that acknowledges the readers' point of view and the pressures they're under.

Use [our audience profiles](#) when you're writing for an external audience to help you think about specific people and what matters to them. These audience profiles are based on real-life people.

Why?

Writing with empathy increases readers' confidence that you can help.

3. Write for your readers and not yourself

Imagine your readers and have them in mind when you write. Aim to write in a way they will understand and find helpful, including ensuring that your language is inclusive. Only include the information they need, rather than everything you know about the topic.

Use language and tone that demonstrates your understanding of the world we regulate and not just the laws we oversee. Focus on the impact and influence your writing can have on them. Consider what you want your readers to think, know and do when they've finished reading.

Why?

Your writing will resonate with readers if it focuses on what they understand and need.

Examples



"We appreciate it's difficult for you to control how your customers act. They might decide to make other people aware of your reward scheme. However, you can take steps to avoid instigating these messages."



From an internal [blog about the 'must, should, could' approach](#):

"It's an approach I have been trialling at home too. My oldest son started secondary school in September, and alongside new friends and new sports teams has also come new expectations about homework. I like to think I have a lot of good advice to offer when it comes to homework, but my son is less convinced! He wants to do it in his own way and doesn't believe my advice can possibly be relevant to his unique (?) circumstances.

So, I've given up the long lectures full of 'you will' and 'I expect' and taken a bit of a step back. I'm clear about what the 'musts' are – his homework must be done on time; what the 'shoulds' are – he should read the assignment properly so he knows what is expected of him; and what the 'coulds' are – for instance, he could plan his work so he doesn't leave it all to the last minute. While I don't doubt there will be struggles ahead it's definitely helping. He knows what the non-negotiables are, but he's also empowered to do things in ways that suit him, and hopefully refine and develop those approaches as he goes along!"

4. Give clear and targeted instructions and recommendations

Make it clear what action readers need to take. Address readers as 'you' and use the present tense. Include relevant examples to illustrate your message.

Why?

Readers can quickly understand what they need to do and your writing will hold their attention in a simple and direct way.

Example



“The process of deleting paper records is usually straightforward: you can shred or incinerate files and the information is permanently destroyed. It's not as easy with electronic information. You should follow this process to delete it:

- Move information to a recycle bin or wastebasket.
- Delete it from the recycle bin.
- The space it occupies on the computer is now designated as free which means you can overwrite it with new information.”

Style and accessibility rules

Everyone's writing style varies, so these rules make sure that all our documents are consistent. It's also a legal requirement that our documents are accessible and you're responsible for doing this.

Following these rules will make sure that your readers understand, navigate and trust your writing. We have listed the rules in alphabetical order, not in order of importance.

Abbreviations and acronyms

Don't put full stops in abbreviations.

Don't use etc (particularly when following eg).

Spell out the name or technical term the first time you use it with the acronym in brackets. Don't include an extra 'the' or quotation marks within the brackets.

Use the acronym on its own after the first instance and use it sparingly.

Don't explain mainstream acronyms that you would expect readers to be familiar with, such as BBC, ITV or CCTV.

Why?

It can be difficult for readers to know what acronyms stand for as they are not descriptive.

Examples

eg

ie

Mr

Mrs

Ms

Examples

Data Protection Act (DPA)

Executive Team (ET)

Information Commissioner's Office (ICO)

Greater Manchester Police (GMP)

Alternative text (alt text)

Write alt text to explain the meaning and context of any images, charts or graphics in your document. Also, see our [rules about use of images](#).

People will read or hear the alt text, if they use assistive technology (this is software that helps disabled people read or interpret what is shown on the screen). The text needs to describe all the important information in the image. One or two sentences is enough. Imagine you're reading out the content of the page. When you get to the image, what would you say to explain the point the page is making? There's no need to add 'a picture of'. If you can, describe the content of the image as though there is no image on the page. For example, write "the minister tweeted...", instead of "an image of a tweet by the minister".

Add your alt text in Office 365:

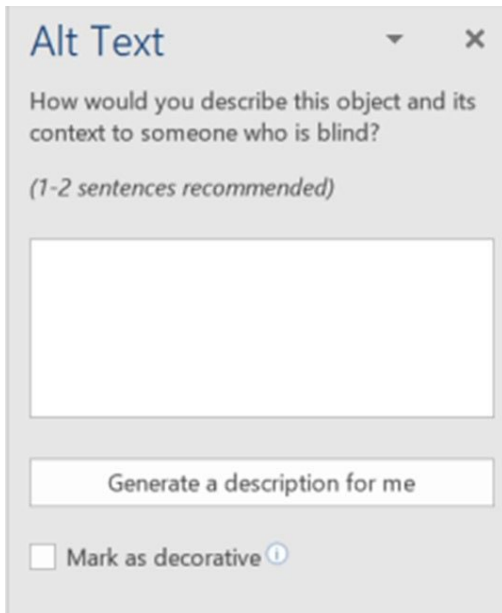
Highlight the image and right click on it.

Select the option "Edit alt text".

Use the text box to add the description.

Check the box to “mark as decorative”, if the image is purely decorative (ie doesn't give any additional information).

Use the accessibility checker in the review tab to check that all images have alt text.



Alt Text

How would you describe this object and its context to someone who is blind?

(1-2 sentences recommended)

Generate a description for me

Mark as decorative ⓘ

Why?

We need to make sure all readers have equal access to the same information. Screen reading software ignores images without alt text, so readers who use assistive technology will miss out on any information included in an image if you do not write alt text.

Examples





Text: "Please fill out the survey to tell us what you think."

You could mark this image of a survey on a clipboard as decorative because it doesn't give any additional information.



"A picture of someone riding a bike and wearing a helmet." The assistive technology the person is using will inform them that it is a picture, so adding this to the alt text is repeating information unnecessarily.

Or "Person riding a bike along the road. They are wearing a white and black helmet, they are leaning slightly over the handlebars and grip the black handlebars with both hands. The sun is setting over the landscape in the background. They are cycling along a road in the countryside." This is too long.



Write alt text like this:

“Person riding a bike wearing a helmet” or “Person riding a bike along a country road”



Don't write alt text like this: “Man on phone and computer.” The alt text is very brief and does not include anything about the facial expression. It also doesn't describe the age of the person – if the context requires it, this is relevant. For example, if the accompanying text was about older people and nuisance calls.



Write alt text like this: “Older man smiling whilst on the phone and using a laptop.”



Don't write alt text like this: "Logo." A screen reader will not know that the image is a logo or the ICO logo without including this in the alt text.



Write alt text like this: "ICO logo."

Bullet points

If the wording before the colon makes sense as a sentence on its own, use an initial capital letter and end with a full stop for each point (example one).

If the wording before the colon is not a complete sentence, use an initial lower case letter and end with semi-colon between each point. Include 'and' or 'or' after the penultimate point to link it all together and end the final point with a full stop (example two).

If the items after the colon are very short or a list, start each point with a capital letter and don't put punctuation between any of them (example three).

Use dots rather than numbered points, where possible.

Why?

Readers trust your writing when you use a consistent style.

Example one

There are lots of reasons to use bullet points:

- They break up long sentences.
- They highlight important points.

Example two

Bullet points are useful to:

- break up long sentences; and
- highlight important points.

Example three

Our directorates are:

- Chief Operating Officer Services
- Regulatory Policy
- Regulatory Risk

Capitals and lower case initial letters

Always use capital and lower case letters consistently following the lists below.

Use capital letters at the start of words sparingly in other cases.

Only capitalise the start of a word in a title, heading or subheading that you would normally capitalise in a sentence.

Also, read [Legislation](#) to learn further rules about when to use capitals and lower case.

Why?

Readers trust your writing when you use a consistent style.

Examples (capital)

Appeal Court and High Court (but the lower courts are always lower case)
Information Commissioner
Information Commissioner's Office
Information Tribunal
Iris (not IRIS)
job roles (when writing about a specific role or addressing or signing letters and emails, such as Chief Policy Officer or Head of Procurement)
names of organisations' teams and departments, such as Strategic Policy Unit and authoritative bodies, such as the Equality and Human Rights Commission
Parliament
Parliamentary Ombudsman
religious faiths, such as Hinduism or Judaism

Examples (lower case)

applicant
complainant
council
code of practice
data protection
data protection principles
decision
decision notice
departments
enforcement notice
freedom of information
government
guidance
information
internet
knowledge pack
model publication scheme
paragraph (of a section or schedule of an act)

police
practice recommendation
preliminary enforcement notice
the press
principle
public authority report
regulatory hub
undertaking

Change notes

Write a change note when you:

- add new information that means readers must do something different or know something new;
- remove guidance that is out-of-date or misleading;
- add new examples (eg cases studies or examples based on decision notices or tribunal decisions);
- add new supporting documents such as PDF forms or Word templates; or
- change wording to add clarity or make it easier to understand.

Don't write a change note when you:

- fix typos;
- make style changes, such as changing a heading or layout; or
- change or remove broken links (unless they are links to something that is crucial to readers' needs).

You need to:

- explain what has changed and how this impacts readers;
- briefly explain why the update has taken place, if needed;
- mention where in the guidance the change appears (eg what section);

- if possible, include the changed information in the note itself so readers can see what has changed without checking the guidance; and
- be as short and succinct as possible, while giving all the relevant information.

Why?

Change notes help us to be transparent about any changes we've made to guidance. It helps readers understand any important changes that they need to be aware of, since they last viewed the content.

Examples



Don't write notes like this:

- Guidance updated.
- Updated the guidance to inform users of the change to the name of legislation.
- Updated to add social media graphics for X (formerly Twitter) and Facebook.
- Removed broken link.
- We have updated the position on the timing of the public interest test following the Upper Tribunal's decision in *Montague v IC and Department for International Trade*. The PIT timing does not include the time of the 'internal review'.
- Updated to reflect differing legislation across the UK.



Write notes like this:

- We have updated this guidance to reflect an Upper Tribunal decision.
- We have updated our position on timings for public interest tests (PIT) following an Upper Tribunal decision. You can find the update under the 'When do we consider the PIT?' section. Public authorities must now assess the balance of the public interest at the time of their decision on a request for information. This does not include the time of the internal review.
- We have updated this guidance to highlight the jurisdiction of the Fundraising Preference Service (FPS). The guidance now makes clear that the FPS covers England, Wales and Northern Ireland but Scotland is not covered by the FPS.

Dates

Present dates in the day, month, year format.

Use cardinal numbers (1, 2, 3) rather than ordinal numbers (1st, 2nd, 3rd).

Write financial years in the style 2022/23.

Why?

Readers trust your writing more when you use a consistent style.

Examples



24 May 2022

Tuesday 24 May 2022

Formatting text for accessibility

For text, use Verdana 12 point (unless you've received a specific request for a different format as a reasonable adjustment or if you are using an iPad where this may not be possible).

Use line spacing at 1.15.

Use one space after full stops and commas.

Justify text to the left (aligned in a straight line on the left margin).

Avoid block capitals.

Avoid underlining text, unless it's a hyperlink.

Use italics sparingly.

If you need to highlight specific words, use bold text rather than using capitals, italics or underlining.

When using colour, choose a good contrast between text and background (dark text on a solid light background gives the best contrast). Speak to [Corporate Communications](#) about the colours we use for branding.

Why?

These standards make text easier to read for everyone and it's part of our commitment to accessible writing. We have a legal obligation to make sure anything we publish on the website is accessible, including PDFs.

Headings and sub-headings

Include a title for every document and format all headings correctly.

If you are creating the document in Microsoft Word, use the pre-set headings under Home > Styles.

Set them as follows:

- Heading 1: font Georgia, size 22, normal, colour one.
- Heading 2: font Georgia, size 16, normal, colour two.
- Heading 3: font Verdana, size 11, bold, colour two.
- Heading 4: font Verdana, size 11, normal, colour two.

For colour one and two, use colours from our corporate branding. Speak to [Corporate Communications](#) about the colours we use. When using colour, choose a good contrast between text and background (dark text on a solid light background gives the best contrast).

Use Heading 1 for the title of the document, and then Heading 2, 3 and 4 for subtitles.

Only use Heading 1 once.

You do not have to use all four levels of headings and you must go back to Heading 2 when you start another section.

Why?

Headings are vital to help readers who use assistive technology navigate through a document, as the screen reader follows the headings sequence. If the structure doesn't follow the hierarchy of headings, then the content won't make sense because it will imply that something is missing.

Headings also help all readers identify the main points of each section and quickly scan through information.

Images and graphics

Avoid using images in documents, unless they clarify written information.

If you need to use an image, you must:

- avoid using images as the sole method of conveying important information;
- repeat any text in an image in the document as well; and
- only use an image if it helps readers to understand the information in a different way.

You can use informative images, charts, diagrams, flow charts, infographics or decorative images in specific situations and you must follow certain rules (these are listed in the examples below).

Why?

Images are often difficult to make accessible, which risks some readers being unable to access all the information you provide.

Images can sometimes clutter pages and make it harder for people to find what they are looking for, particularly if they're reading the information on a mobile device.

Text is easier to read than images when scaled up by people using screen magnifiers.

Images may become pixelated and need to be scrolled vertically and horizontally when zoomed in.

Informative images

You can use images to illustrate information you have given in the text.

If you have explained the information clearly in the text, you do not need alt text for this type of image.

Example



Information Commissioner John Edwards gave a speech today.

In this example, the image of John Edwards doesn't add any additional information because the text explains he gave a speech. Therefore, this image is decorative, so check the alt text box to "mark as decorative". Read the [alt text rule](#) for further information.

Charts

You can use charts, such as bar graphs or pie charts. When you do, you must also include at least one of the following:

- a description of the chart directly under it;
- a table of the raw data; or
- a link to the raw data in an accessible file.

If you write a description, avoid describing the chart vaguely or too broadly. Explain what is happening in the information and any important trends.

If you provide the raw data as a table in an accessible file, make sure you [format your table correctly](#) and consider if it is an appropriate alternative. For example, when you have a chart showing a long time series of data, a description of the trends is more appropriate than a table. The experience should be the same as looking at the chart.

Example



“The bar chart shows the number of reported data breaches on the vertical axis and EU countries on the horizontal axis” is too broad.

This is more specific:



“The data shows that the sectors a, b and c have had the highest number of reported breaches and sectors x, y and z have reported the least.”

Diagrams and infographics

Only use a diagram or infographic if it makes your message clearer, or summarises a large amount of information.

Make them simple and easy to understand. Use as little text as possible.

Provide a plain text description of the content. You should publish this alongside the diagram or infographic.

Flow charts are tools to help people make a decision or find a specific answer. If this is your aim, ask the Communications team about creating an interactive tool rather than a static graphic. If you feel an interactive tool will not work as readers need to have access to all the information at once, a flow chart is probably not the best method of communication.

Example

If you're making a product or service that involves processing personal information, it is important to consider data protection law throughout the design and development process. This includes kick-off, research, design, development, launch, and post-launch phases.

The case for privacy – Your organisation must comply with relevant laws. But there are also pressing reasons beyond legal compliance to prioritise privacy. For example, the risk of harming people and society itself, as well as the business risks to organisations.

Privacy in the kick-off stage – including kick-starting collaboration, mapping your product's personal information needs, and ideas on weaving privacy into your business case.

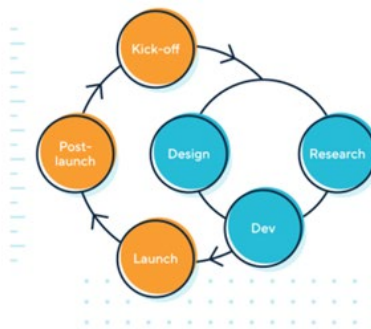
Privacy in the research stage – including gathering up-front perspectives on privacy, testing of work in progress, and ways to protect the personal information of research participants.

Privacy in the design stage – including choosing the right moments, obtaining valid consent, and communicating privacy information in ways people understand.

Privacy in the development stage – including defining the appropriate amount of personal information required, exploring technical solutions that enhance privacy, and protecting personal information in development environments.

Privacy in the launch phase – including conducting pre-release checks, factoring privacy into rollout plans, and deciding how best to communicate changes.

Privacy in the post-launch phase – including



Decorative images

Don't use decorative images unless there is a clear reason to do so. This might include:

- adding an image of a member of staff where that person is quoted;
- including a communications asset in a blog post to associate it with a wider campaign; or

- having robust evidence that your audience engages with content that contains images.

Don't use them as a way to break up text, use formatting techniques to help you instead.

When you do use a decorative image, follow the [alt text rules](#).

Inclusive language

Don't use the terms 'the vulnerable' or 'vulnerable groups' or use language that implies we will 'save' people.

Refer to **people** and the **context** that is making them 'vulnerable', at a specific point in time – don't generalise by suggesting a person is always vulnerable.

Where possible, talk about how we are empowering people to protect themselves or how we are taking action to prevent situations that cause people to experience risk in the first place.

When describing identities, use language that can help promote inclusion and create a more welcoming environment.

Avoid making assumptions about people's nationality, ethnicity, gender identity, sexual orientation or label someone as disabled without knowing. For example, making assumptions that a black or Asian person is not British. This is an example of a micro-aggression.

Aim to understand how people prefer to be addressed and how they prefer to describe themselves. Do respect people's preference and allow space for them to self-describe. For example, not all neurodiverse people describe themselves as having a disability.

Use person-first or identity-first, when talking about disability, gender identity or sexual orientation. For example, a person with a disability or disabled person.

Only address a person's disability, gender identity, sexual orientation or ethnicity where it is relevant.

Use gender neutral text, where possible (eg them, their, they, person, people).

When referring to the community of people that might be described as queer, LGBT, LGBT+, or LGBTQ, please use LGBTQ+ community.

When addressed in full, you should define LGBTQ+ as lesbian, gay, bi, trans, and queer, or lesbian, gay, bi, trans, queer, and other identities.

LGBTQ+ represents a spectrum of gender, sexual, and romantic identities that frequently overlap or fit under multiple umbrellas. The + is important as it highlights that this is non-exhaustive and refers to other identities that are part of the community but may not be labelled under LGBTQ.

In this context, bi is an umbrella term including bisexual, biromantic, and other identities. Trans is an umbrella term including transgender people, trans men, trans women, non-binary people, agender people, bigender people, and other identities.

Trans is an adjective and refers to anyone whose gender identity differs from their assigned sex at birth (eg trans woman or trans community).

Queer is a valid identity or label used by many in the community, and you can use it especially if it refers to someone's chosen identity or label. However, queer can sometimes be seen as a derogatory term and you should use it carefully, bearing in mind the context and your audience.

In some contexts, the Q from LGBTQ+ may also refer to 'questioning', where a person is unsure of or exploring their identity.

Why?

Vulnerability has many negative connotations, such as weakness, victimhood or someone for others to take responsibility for. It can be stigmatising for the people we are talking about and creates a feeling of them and us, normal and not normal. It can also make us seem 'paternalistic' – as if we are the protector and 'the vulnerable' are the victims, unable to save themselves.

It's important that your writing promotes inclusion and a more welcoming environment.

Examples

Don't use 'most vulnerable'*

Use 'those in situations where they are at risk' or 'those at most risk of harm'

Don't use 'vulnerable people'

Use 'people who need extra support to protect themselves' or 'people who are disadvantaged because of issues such as information or power imbalances'

Don't use 'BAME (black, Asian and minority ethnic)'

Use 'ethnic minority people or groups' or 'people from ethnic minority backgrounds'

Don't use 'blacks' or 'the blacks'

Use 'black people' or acknowledge their black Caribbean or African backgrounds

Don't use 'blacklist' or 'whitelist'

Use 'deny list' or 'allow list'

Don't use 'mixed people' or 'mixed-race people'

Use 'people with a mixed ethnic background' or 'people from a mixed ethnic group'

Don't use 'non-white'

Use 'ethnic minority people or groups' or 'people from ethnic minority backgrounds'

Don't use 'people of colour'

Use 'ethnic minority people or groups' or 'people from ethnic minority backgrounds'

* If you're discussing 'vulnerable' in the context of [ICO25](#), please put any reference in quotation marks. ICO25 will be updated in due course.

We will update this page as we progress our current work on inclusivity and accessibility in line with our EDI objectives.

ICO

Refer to us as:

- the Information Commissioner's Office;
- the ICO;
- the Information Commissioner; or
- 'we' or 'us'.

Do not refer to us as 'the office'.

For internal messaging, use 'we' and 'us' whenever possible.

Only use the [ICO logo](#) and no others and do not alter it.

Why?

Readers trust your writing more when you use a consistent style.

Legislation

Use capital letters for the full title of legislation, or to refer to a specific type of legal instrument (eg an Act, Regulations or a Bill).

Use lower case for more general, everyday descriptions of legislation, regulation or codes of practice.

Use lower case to talk about parts or provisions within legislation.

If you quote a specific provision, use the section number, regulation number or article number. If it's in a schedule, quote the schedule and paragraph number. Don't include the part of the Act or schedule.

Use abbreviations of the legislation we regulate consistently, following the examples below.

In general, spell out the full title the first time you use it, with the abbreviation in brackets (see [Abbreviations and acronyms](#)). But you don't need to spell out UK GDPR, NIS, eIDAS or INSPIRE.

Why?

People find it harder to read text with lots of capital letters and numbers. Keeping it simple makes it easier to read.

But capitals can help to show when a word has a specific legal status.

Using abbreviations consistently helps readers trust what we say.

Examples (capital)

Act (of parliament)

Bill

Convention (treaty)

Data Protection Act 2018 (DPA)

Data Protection and Digital Identity Bill (DPDI Bill)

EU Directive

EU Regulation

Environmental Information Regulations 2004 (EIR)

European Convention on Human Rights (ECHR)

Freedom of Information Act 2000 (FOIA)

Privacy and Electronic Communications Regulations 2003 (PECR)

Regulations (UK secondary legislation)

Examples (lower case)

article

code of conduct

code of practice

legislation

paragraph

part 3

recital

regulation 5 (for a specific provision of secondary legislation)

regulation (in the general sense of an area of regulation)

regulations (in the general sense of rules and regulations)

secondary legislation

schedule

section

statute

statutory guidance

treaty

Examples (how to quote provisions)

Use 'section 1'

Avoid 'part 1, section 1'

Use 'section1(1)(a)'

Avoid 'section 1 paragraph 1(a)'

Use 'schedule 1 paragraph 5'

Avoid 'schedule 1, part 2, paragraph 5' or 'paragraph 5 of schedule 1'

Use 'regulation 5 (of Regulations)'

Avoid 'section 5 (of Regulations)'

Use 'article 1 (of the UK GDPR)'

Avoid 'section 1 (of the UK GDPR)'

Examples (how to abbreviate legislation)

Use 'DPA'

Avoid 'DPA18', 'DPA2018', 'DPA 2018'

Use 'EIR'

Avoid 'EIR 2004', 'EIR Regulations'

Use 'EU GDPR'

Avoid 'GDPR'

Use 'FOIA'

Avoid 'FOI Act', 'FOIA2000', 'FOIA 2000'

Use 'PECR'

Avoid 'PECR 2003', 'PECR Regulations'

Use 'UK GDPR'

Avoid 'UKGDPR'

Links

You're responsible for adding hyperlinks into your writing.

Create hyperlinks by choosing words in the link text that are meaningful.

Don't use 'click here' or 'here' as this is too ambiguous.

Distinguish links from other text by colour and underlining.

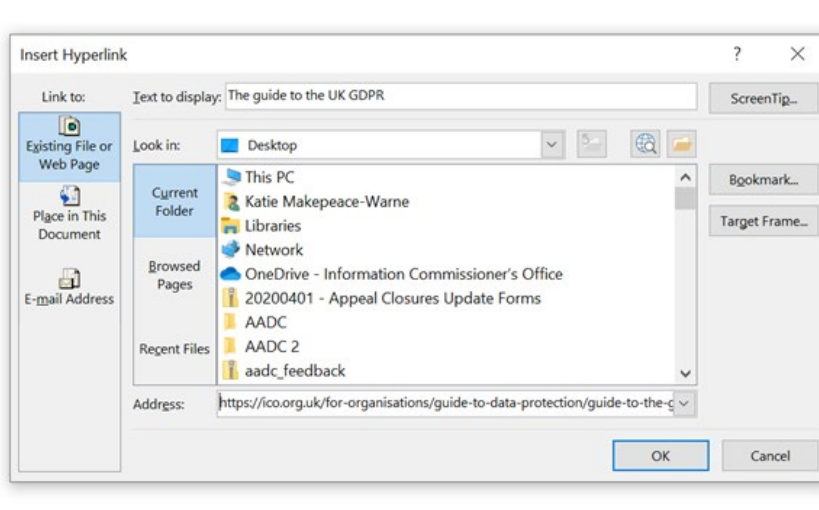
Add a title that links to a URL, instead of listing a URL. Highlight the text you want to use, go to insert hyperlink and fill in the Text to display box.

If you're converting a Word document to a PDF, make sure the links are highlighted in blue and underlined.

Why?

People who use assistive technology sometimes scan a page for links, instead of reading the link in the context of the wording around it. It's therefore important that the link text is meaningful and accurately describes where the link goes to so they can quickly find the information they are looking for.

Highlighting links in a different colour and underlining them helps people who may be colour-blind and can't see the difference in colour.



Example



Read more about [consent and the GDPR](#).

For further information, read the [guide to the UK GDPR](#).

Must, should, could

Use '**must**', '**should**' and '**could**' when you are writing formal guidance about how organisations should comply with the laws we regulate and when you are distinguishing between what the law requires and good practice.

Use these terms consistently and highlight in bold.

Use **must** to refer to legislative requirements.

Use **should** to refer to what we expect organisations to do to comply effectively with the law (eg good practice and not a legislative requirement). This covers our recommendations to organisations that they should do this unless there is a good reason not to. If they choose to take a different approach, they must be able to demonstrate that their approach also complies with the law.

Use **could** to refer to an option that organisations could consider to help them comply effectively (eg a good practice example when there are likely to be alternative ways they could comply).

Read our [guide to using must, should and could](#) for more information.

Why?

Readers can quickly understand what they need to do and your writing will hold their attention in a simple and direct way.

Example



"You **must** have a valid lawful basis in order to process personal information"

To decide whether using personal information is fair, you **should** consider a person's reasonable expectations and whether using the information is warranted.

To help you comply with the accountability principle in the UK GDPR, you **could** have a risk policy. This could be a separate document or part of your wider corporate policy."

Numbers

Spell out from one to nine.

Use numerals from 10 to 999,999.

Write numbers above 999,999 as figures using million or billion in full.

Apply the same rules even when a number under 10 appears in the same sentence as a number higher than 10.

Use commas in numbers with four or more digits. Reading from the right, put a comma after every third digit.

Don't begin sentences with numerals. If necessary, reword the sentence to avoid it, or spell out the number.

Spell out ordinal numbers (first, second, third).

Why?

Readers trust your writing more when you use a consistent style.

Examples

10 million

£64 billion

I've interviewed 13 people today and will speak to seven of them next week.

64,000

1,432,567

Twenty-six officers around the world attended the meeting.

Singular or plural

Treat these as singular:

any company or organisation

council

committee

data

department
government
group
the ICO
NHS Trust
Team

Treat this as plural:
staff

Why?

Readers trust your writing more when you use a consistent style.

Examples



The ICO has an office in Wilmslow.
The policy team is writing new guidance.

Spelling and grammar

We expect a good standard of spelling, punctuation and grammar.
Use the 's' form of spelling (rather than the 'z' form) and follow our preferences for other common alternative spellings.

See our [further resources](#) section for more information, including details on spelling, punctuation and grammar in [the Guardian and Observer style guide](#).

Why?

Readers trust your writing more when you use a consistent style and avoid spelling and grammar errors.

Examples

Avoid `advisor`

Use `adviser`

Avoid `dispatch`

Use `despatch`

Avoid `e-mail`

Use `email`

Avoid `focusses`

Use `focuses`

Avoid `home page`

Use `homepage`

Avoid `inquiry` (unless it is a formal government inquiry)

Use `enquiry`

Avoid `learnt`

Use `learned`

Avoid `on-line`

Use `online`

Avoid `organize`

Use `organise`

Avoid `realize`

Use `realise`

Avoid `requestor`

Use `requester`

Avoid `supervize`

Use `supervise`

Avoid `web-site`

Use `website`

Avoid `Wi-Fi`

Use `wifi`

Symbols

Use words rather than symbols.

Use `and` rather than `&`, unless it's part of a company name.

Avoid the forward slash. Use `or...or both` rather than `and/ or`.

One exception is the percentage sign (%) which you should use.

Why?

It's easier to read and scan words than symbols.

Examples



terms and conditions

Marks & Spencer

journey by rail or bus, or both

50%

Tables

Only use tables to display relationships between data, not to organise information. Consider whether lists or columns would be as effective.

Write clear headers for rows and columns.

Don't include split or merged cells, blank rows or columns.

For anything more than a simple table, provide a table description so readers can navigate and understand it.

Why?

Screen readers and other assistive technologies look for certain markers, such as headers and data cells. They read aloud the headers and cells, so if you use the table for layout rather than displaying data, the meaning will get lost.

Example

[Title] Holiday accommodation availability

[Summary] Column one shows the number of bedrooms in the property, the other columns show the type and number of properties available.

	Studio	Apartment	Chalet	Villa
1 bed	60	40	0	0
2 bed	0	25	2	0
3 bed	0	15	12	5
4 bed	0	0	18	50