

Winterborne Stickland Parish Council

COMMUNICATIONS STRATEGY 2022

Overview of Recommendations

- Ensure compliance with Code of Recommended Practice on Local Authorities, Freedom of Information, GDPR & Web Content Accessibility Guidelines 2.1 AA
- Develop a brand and logo
- Expand website content to include events, local history, poll/consultation & village projects
- Design website for ease of use with mobile phone
- Reduce usage of Facebook and use to drive traffic to website
- Look at using Instagram and Twitter in the same way
- Be more focused and disciplined in use of print media
- Explore expansion of use of local radio/TV media
- Use 4 physical media – signage around the village to increase brand awareness and drive traffic to website
- Consider physical mail drop
- Start collating an email-based mailing list

Winterborne Stickland Parish Council

COMMUNICATIONS STRATEGY 2022

1. INTRODUCTION

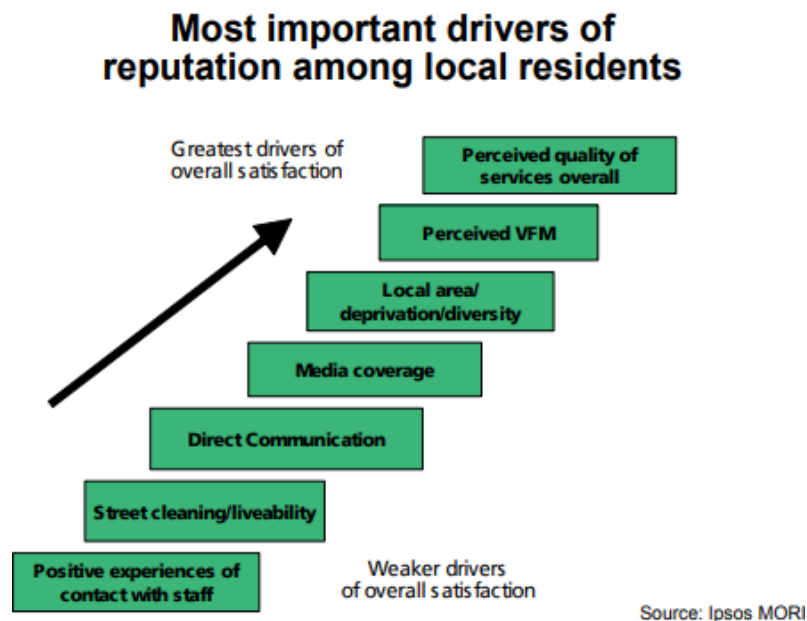
This strategy will focus the communication efforts of the Parish Council and support it to be effective and efficient in its activity to serve Winterborne Stickland Parish and our wider audiences (referred collectively as 'our community').

1.1 Strategy context

This strategy is advised by the Code of Recommended Practice on Local Authority Publicity (the 'Code') (Appendix 2). The Code is statutory guidance and the Parish Council must have regard to it and follow its provisions.

1.2 The need for a communications strategy

Winterborne Stickland Parish Council has a duty to engage effectively with its residents, partners, and stakeholders. Better communications leads to recognition and respect – reputation is important for the Parish Council to be effective.



Many councils fail to effectively communicate who they are and what they do – and the less people know about an organisation, the less likely they are to rate it highly.

Achieving the council's aims and objectives requires good communication with every individual, group and organisation we work with, partner with or provide services for.

Without proper co-ordination it would be difficult to make sure messages communicated by the Parish Council are consistent and accurate. But if communication is managed effectively, the Parish Council can create and seize opportunities to communicate with partners and the public and build an accurate and positive reputation.

Recent feedback has highlighted that the Parish and village residents may, in part, not feel that the Parish Council is as open and transparent as they wish. Active and robust communication would alleviate this issue.

1.3 What should we be communicating?

Research in 2008 by IPSOS MORI, the independent research organisation, commissioned by the Local Government Association, provides indicators of the most important drivers of 'council' reputation among local residents:

- Perceived quality of services
- Perceived value for money
- Direct communications
- Council performance
- Clean, green and safe environment
- Positive experiences of contact with council employees and contractors
- Media coverage

If the council is to build a strong reputation, effectively inform residents, engage, and improve resident satisfaction then these drivers must form the basis of our communications strategy.

There is also a need for proactive and reactive information:

- Proactively – telling people information to influence (and change attitudes if beneficial)
- Reactively – giving residents information they want to know

2. COMMUNICATION OBJECTIVES

- 2.1** To ensure the Parish Council is aware of, and responds in a timely manner to what the people of Winterborne Stickland Parish want AND need to know.
- 2.2** To use a variety of digital and traditional communication channels to make sure the information we provide is accessible for the whole community.
- 2.3** To ensure our messages are relevant, clear and factual to ensure maximum impact and interaction between the Parish Council and the community.
- 2.4** To provide a user-friendly website to drive interaction with our audiences.
- 2.5** To improve, plan and shape the future of the parish and village according to local needs and priorities.
- 2.6** To use engagement to inform decision making, ensuring decisions are fit for purpose and meet the needs of the parish and village.
- 2.7** To enhance the wellbeing of the parish and village.

3. COMMUNICATIONS PRINCIPLES

Five principles underpin the strategy. Our communication channels need to:

- Be accessible for all
- Be convenient to access

- Help manage expectations
- Be relevant, clear and factual
- Encourage two-way positive engagement and to 'act together'.

4. INFORMATION REQUIREMENTS

4.1 Freedom of Information, data protection and Web Content Accessibility Guidelines (WCAG)

The Parish Council must ensure they are aware of their obligations in both Freedom of Information and Data Protection.

4.1.1 Freedom Of Information

Should the Parish Council receive a request for information under the Freedom of Information Act 2000 on a topic on which there is correspondence (written or email), that correspondence will normally have to be disclosed unless it is exempt. The fact that the disclosure may prove embarrassing would not, in itself, prevent disclosure. In addition, care should be taken when processing personal data.

4.1.2 Data Protection

The Data Protection Act 2018 prevents the use of personal information other than for the purposes for which it was supplied. Members should bear this in mind when using any personal data which may be supplied to them by their constituents.

The Parish Council cannot disclose confidential information or information the disclosure of which is prohibited by law. The Parish Council cannot disclose information if this is prohibited under the terms of a court order, by legislation, the Parish Council's standing orders, under contract or by common law. Parish Councillors are subject to additional restrictions about the disclosure of confidential information which arise from the code of conduct adopted by the Parish Council, a copy of which should be available via the Parish Council's website.

4.1.3 Web Content Accessibility Guidelines (WCAG)

Local (Parish and Town) councils must achieve the required standard of WCAG 2.1AA (and WCAG2.2 from 2022) website accessibility compliance as required since September 2018 and for implementation by September 2020. Compliance may be seen as onerous and complex yet is a requirement.

This includes:

1. A fully compliant website or mobile application meeting WCAG 2.1AA standards
2. A compliant Accessibility Statement and Accessible Document Statement
3. All documents published (or commissioned) by the council to meet accessibility standards

4.1.3.1 Small parish councils and authorities should publish on their website

- a) All items of expenditure above £100
- b) End of year accounts
- c) Annual governance statement (it is recommended 5 years of historical statements are published)
- d) Internal audit report
- e) List of Councillors or member responsibilities and their register or

- declaration of interest (Currently held online by Dorset Council)
- f) The details of public land and building assets
 - g) Minutes, agendas and meeting papers of formal meetings

4.1.3.2 Small parish councils and authorities must publish (on their website)

- a) Accessibility Statement (revisited annually)
- b) Privacy Policy

4.1.3.3 Small parish councils and authorities use of documents

- a) All document formats should be checked before uploading to the website (MS Word, Excel, PDF etc) – free tools should be used as well as a human check
- b) Highest level of accessibility is with HTML (the website itself and lowest being PDF, which is also less usable on a mobile device)
- c) MS PowerPoint or Publisher should not be uploaded to the site as these files are not fully accessible.

4.1.3.4 Policy and compliance plan

Further information on the complexities can be found at [How to Meet WCAG \(Quick Reference\) \(w3.org\)](#). A copy of KMA compliance checklist is appended at Appendix 3.

To ensure compliance, the Parish Council should:

- a) Appoint an independent third party to manually audit your website at regularly scheduled intervals (annually at a minimum)
- b) Utilise automated scans and continually monitor the website for accessibility issues
- c) Incorporate web accessibility training for all individuals who upload to website
- d) Invite feedback and provide for customer assistance for those who have disabilities
- e) Form a web accessibility committee and appoint a coordinator to that committee
- f) Adopt and publish an accessibility policy

4.2 Individual Councillors' policy

The purpose of this policy is to clarify the roles and responsibilities of all Officers and Councillors involved in dealing with the media and communication and to provide guidance on how to handle media and social media interest. It is also to ensure that the Parish Council is seen to communicate in a professional and objective manner.

This policy does not seek to regulate Parish Councillors in their private capacity but does provide advice and guidance on their sensible use of conventional and social media. The Parish Council's communications seek to represent the corporate position and views of the Parish Council. If the views of Parish Councillors are different to the Parish Council's corporate position and views, it is the responsibility of every Councillor to make this distinction clear.

Subject to the obligations on Parish Councillors not to disclose information referred to in section 4.1 and not to misrepresent the Parish Council's position, Parish Councillors are free to communicate their position and views.

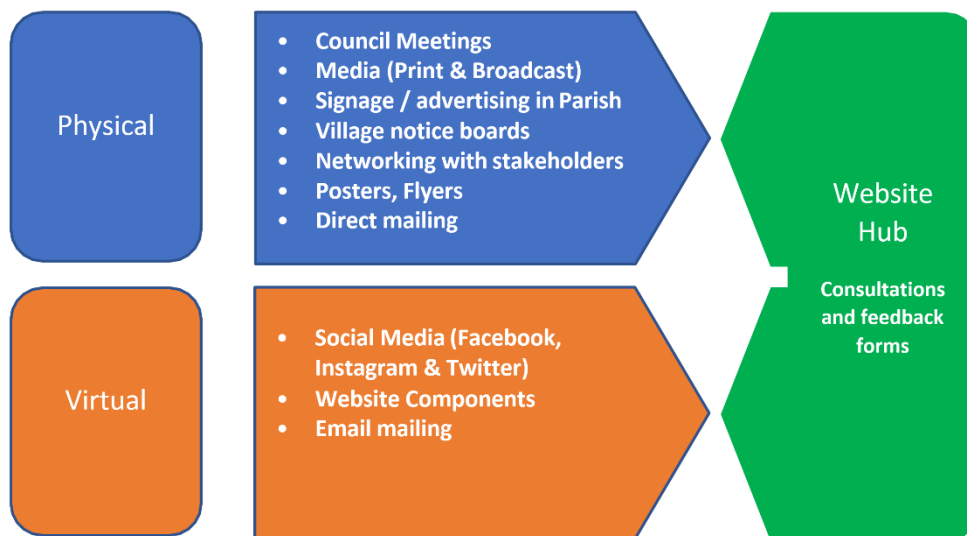
In all cases, the Parish Council's approach, in accordance with the Code and the Guide, is that all individual Councillor communications should:

- be lawful
- be cost effective
- be objective
- be unbiased
- be proportionate and appropriate
- have regard to the Parish Council's policies
- have regard to Equality and Diversity
- be issued with care during periods of heightened sensitivity (eg elections)

If in doubt, caution should be exercised rather than say anything.

5. COMMUNICATION CHANNELS

The strategy has an integrated plan:



There are two channels with many types of communication, the type of communication used will depend on the target audience and the message to be communicated.

5.1 Strategy Purpose

5.1.1 Consultation

Consulting residents on important issues will be key to the strategy. It will ensure that those most affected are able to put forward an opinion and given an opportunity to make a difference.

The strategy has a desire to increase transparency and to enhance access to planning application information especially.

In order to achieve this the Parish Council will:

1. Continue to attract as many participants as possible to the monthly parish council meetings.
2. Use an enhanced website to provide information
3. Use a mailing list (email) process to request opinions of residents
4. Continue to post information on the Village Notice Board.

5.1.2 Communication

Communicating with members of the parish and village will be achieved in several ways to ensure all sections of the community are reached.

1. Parish Council meetings are open to the public and include an opportunity for members of the public to engage with Councillors.
2. Agendas for all meetings are sent to Parish Councillors and other stakeholders and posted on the village notice boards, Website and other social media in advance of each meeting.
3. Contact details for all Councillors and the Clerk are available on the village notice board and the Parish Council website.
4. The Parish Website will continue to be regularly updated and has a wealth of information including:
 - (1) agendas, minutes
 - (2) calendar of meetings
 - (3) Village events
 - (4) planning application notices
 - (5) Solar Fund information
 - (6) important notices
 - (7) project updates
 - (8) local information sections are also updated regularly.
5. The Village Notice Board will continue to be regularly updated to provide information about the activities of the Parish Council.
6. The Parish Council utilises social networking with Facebook, which will drive traffic to the website as the core source of information. Expansion of social media presence to other platforms will be explored
7. The Valley news will provide an important communication tool and The Parish Council will provide the paper with copy that provides information about the Parish and Village. We will invite Valley news to each council meeting and provide them meeting dates and other relevant information.
8. Additional consideration should be given to Physical notices for special events, using local radio / television stations.

5.2 Branding

5.2.1 Purpose of Branding

The purpose of branding is to engender recognition in the target audience and is not to sell or drive behaviours. As an example, Warburton Bread, spend on average more than £6m per annum on TV and media advertising, to enhance awareness of their brand when a shopper is faced with a choice on the shelf, with their main rival Hovis. Hovis rarely, if ever, advertises as it is a household name already and expenditure in this area does not increase sales.

A simple process would look like:

1. Develop brand positioning
 - a. A positioning statement is typically three to five sentences in length and captures the essence of the brand positioning. In essence the reason for existing.
2. Develop the messaging strategy
 - a. This is covered by the communication strategy
3. Develop your name, logo and tagline

4. Develop content
 - a. This is covered by the communication strategy
5. Develop your website.
 - a. This is covered by the communication strategy

5.2.2 Parish Council Recognition

The Parish Council does not have a 'known identify' or 'personality' with most residents, although they may be aware that a Council does exist. It is likely that an understanding of the Council's purpose, successes and operational output is not known.

5.2.3 Components

The Parish Council should create clarity of its brand by tackling two elements not covered by this strategy:

1. Develop brand positioning
 - a. This should be outlined by a sub committee and drafted for full council consideration
 - b. This should be published on the website
2. Develop a logo and tagline
 - a. A village competition – advertised physically (posters), media (Valley News) and virtually via Facebook for a logo. A prize could be offered.
 - b. The Chairman and appointed officers create written objective criteria for selection
 - c. Entries should be slimmed to 5 by The Chairman and appointed officers and a final winner selected by full Council

6. STRUCTURE

6.1 Website

The Parish Council website is the most important vehicle for the promotion of Parish Council and wider Parish activities.

6.1.1 Principles

The website will not:

- contain content that may result in actions for libel, defamation or other claims for damages
- be used to process personal data other than for the purpose stated at the time of capture
- promote any political party or be used for campaigning
- promote personal financial interests or commercial ventures unless as Partner and an amenity to the Parish
- be used for personal campaigns
- be used in an abusive, hateful or disrespectful manner

6.1.2 Components

In order to provide a coordinated process our strategy is:

- Create a larger and more crafted website hub to include:
 - Events:
 - i) Events promotion page with hyperlink where relevant
 - ii) Provide direct access to all partners and village groups to 'advertise' what they do and utility / amenity to the village. Partners will include Solar Fund, Village Pub, Village

garage, Village Hall, Fish Farm, Industrial Estate business, Sports and Social Club, Croquet Club, Craft Club, Warriors Club, Toddler Group, Dunbury School, Taxi services, Nursery.

- Redesign the website for mobile phone accessibility
- Village Project page for historical and village photo information
 - i) Create a content 'vetting' process, which should include both residents and delegation with the Parish Council
- Consultation engagement
 - i) Sign up to email mailing list
 - ii) Invitation for comments via email mailing list
 - iii) Creating a website consultation or poll for those unable to attend meetings. Investigate the usefulness and/or disadvantages of such a facility.
- Make website more active with fresh content
 - i) Enhance Google search engine listing position with fresh content
 - ii) Move away from PDF based documents
- Have a specific section for help, advice and notices for the River Management Group and flood warning capability (utilising email mailing list as well)

6.1.3 Draft website architecture

An outline of the overall plan for the website is appended at Annex 1. Many of the existing pages already suit our needs such as the Meetings page and finances page. However as suggested above additional pages should be inserted as shown at Appendix 1 and in 6.1.2.

6.2 Social Media

6.2.1 Principles

Social media can be used by the Parish Council as an effective and economic way to achieve resident engagement and attract engagement. However, caution does need to be exercised, as platforms can allow difficult, abusive or unpleasant comments. This has historically been experienced by the current Facebook platform group.

The aim of this part of the Strategy is to make sure:

- Engagement with individuals and communities and successful promotion of Parish Council-based services through the responsible use of social media
- A consistent approach is adopted and maintained in the use of social media
- That Parish Council information remains secure and is not compromised through the use of social media
- That users operate within existing policies, guidelines and relevant legislation
- That the Parish Council is not brought into disrepute.

Social media activity isn't something that stands alone. To be effective it needs to integrate as part of the general communications mix. Any planned campaigns, promotions and activities can be included in social media platforms to increase reach and exposure.

6.2.2 Components

This strategy will extend social media presence, over time, to include:

- existing Facebook
- Instagram

- Twitter

The purpose will be to drive stakeholders to the website as the central locality for information and engagement hub.

As such the Parish Councils role is to create, but not 'own' the accounts per se, allowing residents to cross communicate on village topics. To reduce the potential for unwanted content, the posting of information by the council is to drive residents and stakeholders' awareness or remind them that the website has new or helpful content.

The Parish Council will create a policy for the management of content, especially where, as a Council, it is felt that content does not adhere to basic standards which:

- contain content that may could result in actions for libel, defamation, or other claims for damages
- promote any political party or be used for campaigning
- promote personal financial interests or commercial ventures unless as Partner and an amenity to the Parish
- be used for personal campaigns
- be used in an abusive, hateful, disrespectful manner or is in potential breach of Equality and Diversity legislation

6.2.3 Counsellor Guidelines

Councillors should not use their own personal social media accounts when posting or commenting on posts about Parish Council business or anything that may be construed as such. Councillors using their own social media accounts or any other form of communication for community or other purposes do so as private individuals and should not use any privileged material gained from their position as a Parish Councillor.

The Appointed Officer or Parish Clerk will be responsible for establishing and administering Parish Council social media accounts. Parish Council posts or comments on posts should only be made using the established Parish Council social media account.

All posts or comments should adhere to the directions of the Parish Council. Once approved by either the Chairman or Council, the Appointed Officer or Parish Clerk will make the post or comment as instructed.

6.3 Media

The primary physical media channel will be Valley News and Forum Focus. These published print media have the advantage of high coverage across the Parish, and therefore a secure and very advantageous source of communication.

Regular delivery of 'copy' to the publications should be a priority. The strategy is to provide monthly copy where possible.

There are, however, additional channels, notably radio and television, which has yet to be explored. This strategy includes this exploration and advises understanding how the Parish Council can interact with such media.

It is not envisaged in the strategy time frame that the council should pursue such channels until some level of clarity, understanding and capability has been built.

6.3.1 Identifying newsworthy items

It is the responsibility of everyone working within the Parish Council to identify newsworthy items; these will include a range of Parish Council activities and decisions, and it is the responsibility of the appointed Parish Councillor or Clerk to make the decision as to whether or not a press release should be issued.

The content of a Press Release should be approved by the Member of the council nominated as the Press Officer.

6.3.2 Handling media enquiries

The Parish Clerk and or the Press Offer co-ordinates all formal media enquiries to the Parish Council. Members and Parish Council staff who are directly approached by the media should not attempt to answer questions themselves without establishing the full facts. If Members are in any doubt, they should consult the Parish Clerk. The Parish Council should not pass comments on leaks, anonymous allegations or allegations about individual staff and Members. The phrase “no comment” should not be used as a response to a media enquiry. The Parish Council is open and accountable and should always try to explain if there is a reason why it cannot answer a specific enquiry.

6.3.3 Managing negative issues

From time to time the Parish Council must respond to negative issues. It is important that these situations are managed carefully to limit the potential for negative publicity. Members and Officers must alert the Parish Clerk as soon as a potentially negative issue, which may attract media interest, is known. They should not wait until contact is made by the media. Members and Officers must be prepared to work together to prepare holding statements, other information and carry out research even if no media have contacted the Parish Council about an issue.

6.3.4 Correcting inaccurate reporting

Should the media publish or broadcast something inaccurate about the Parish Council, a quick decision needs to be taken on any action necessary to correct it. The issue should be discussed with the Parish Clerk to decide what action is appropriate. This could be a letter or news release, a conversation with the journalist concerned, a personal letter to the editor or legal advice. It will also be necessary to decide who is the most appropriate person to take the agreed action. It should be noted that in the case of minor inaccuracies which have little or no impact on the message being conveyed, it can sometimes be counterproductive to complain; each case should be judged individually. Occasionally the Parish Council will get something wrong. In these cases, damage limitation is the key – this can usually be achieved by admitting the mistake, apologising and stating how the Parish Council will learn from the error or put it right.

6.3.5 Press releases

The use of press releases is a key technique for publicising Parish Council activities, decisions and achievements. An official Parish Council release is made on behalf of the Parish Council as a whole; it will be written and issued by the Parish Clerk. Official Parish Council releases will follow a corporate style appropriate for the media being targeted and a central record will be maintained. All releases will accurately reflect the corporate view of the Parish Council, contain relevant facts and may include an approved quotation from an appropriate Parish Councillor. Parish Council press releases will not promote the views of specific political groups, publicise the activities of individual Parish Councillors, save when on official business, identify a member’s political party or persuade the general public to

hold a particular view. All official Parish Council releases will be placed on the Parish Council's website within one working day of issue.

Press releases should also include easy access to the website via QR codes as a mobile phone enabled strategy.

6.3.6 Interviews

Any officer or Councillor who is contacted by a journalist requesting an interview in their capacity as a representative of the Parish Council should refer the matter to the Parish Clerk. The situation and the information required by the journalist will inform the choice of person to put forward for interview.

Officers should never give their opinion on specific Parish Council policy but must keep to the 'corporate' line and key messages, their role being to provide expertise and factual knowledge only in support of the Parish Council's approved and agreed policies.

6.3.7 Media coverage of council meetings

Provision is made for members of the media to attend Parish Council and Committee meetings. During meetings Members and Officers should be mindful that any comments and messages are put across in a manner which gives the journalist an accurate picture rather than relying on the journalist's interpretation of what may be a complex issue. Where a meeting of the Parish Council and its committees includes an opportunity for public participation, the media may speak and ask questions. Public participation is regulated by the Parish Council's Standing Orders. Both the media and the public are entitled to film and record council meetings held in public.

6.4 Physical Media

There are several physical media approaches that the Parish Council, have at their disposal:

- Physical mail drop
- Signage within the village
- Door to door contact

6.4.1 Physical mail drop

This process may not be as expensive as potentially perceived and provided either via Valley news or Post Office process. At this point the strategy is to investigate this direct process with the objective of 100% coverage of the Parish and Village. There are advantages to this 'direct' approach in the perception of the Councils urge to communicate directly. However, the use of Valley News could achieve the same effect. The Parish Council will investigate further the advantage and disadvantage of both process and present a fully costed proposal for the full Council meeting.

6.4.2 Physical signage in the Parish

It should be noted that during the 2020 / 2021 lockdown that Valley News went to a virtual platform, with local signage around the locality to maintain a presence. This concept will be reflected in this physical strategy and extended to connect with the residents. This should also include easy access via QR coding as a mobile phone enabled strategy.

In attempting to 'drive' resident internet-based traffic to the informative website, the coordinated approach would include low cost 'estate agent' style signage around the Parish 'advertising' the

website as a source of useful information. This aspect of the strategy will need to be explored in terms of:

- Cost
- Acceptance by the community

The purpose of physical signage is to enhance all channels of communication, deepen the 'branding' and reinforce residents' awareness of the website, thus engendering positive behaviour of residents to access the website, thus allowing the Parish Council to engage with the residents via the website. This then gives the need to make the website as 'all singing' and a useful source of information and communication.

- The Parish Council
- Useful information
- The existence of the website

6.5 Village notice board

Use of the notice board, by the Church, for meeting dates and agendas should continue. A more permanent and obvious indication to visit the website should be added.

6.6 Networking

Attending stakeholder events should be standard practise (such as attending Solar Fund meetings) to introduce both the Parish Council and Councillors where relevant.

6.7 Posters / Flyers / Direct mailing

6.7.1 Flyers

These would be a low priority technique, but one that could be utilised. Use of the Royal Mail to deliver information about special 'issues' where the Parish Council would be looking to interact with close to 100% of residents directly may be advantageous See 6.4.1.

6.7.2 Posters

Posters could be used for special events, as well as be utilised to inform residents. An example would be the formal opening of the play park was potentially a missed opportunity. Annual river clearance would be a further ongoing example. This would entail cost, yet, would meet the objectives set out in section 2.

6.8 Email based mailing list

This is a high priority process where residents will be invited to 'sign up' to a mailing list database (GDPR compliant) which can then be used to directly communicate:

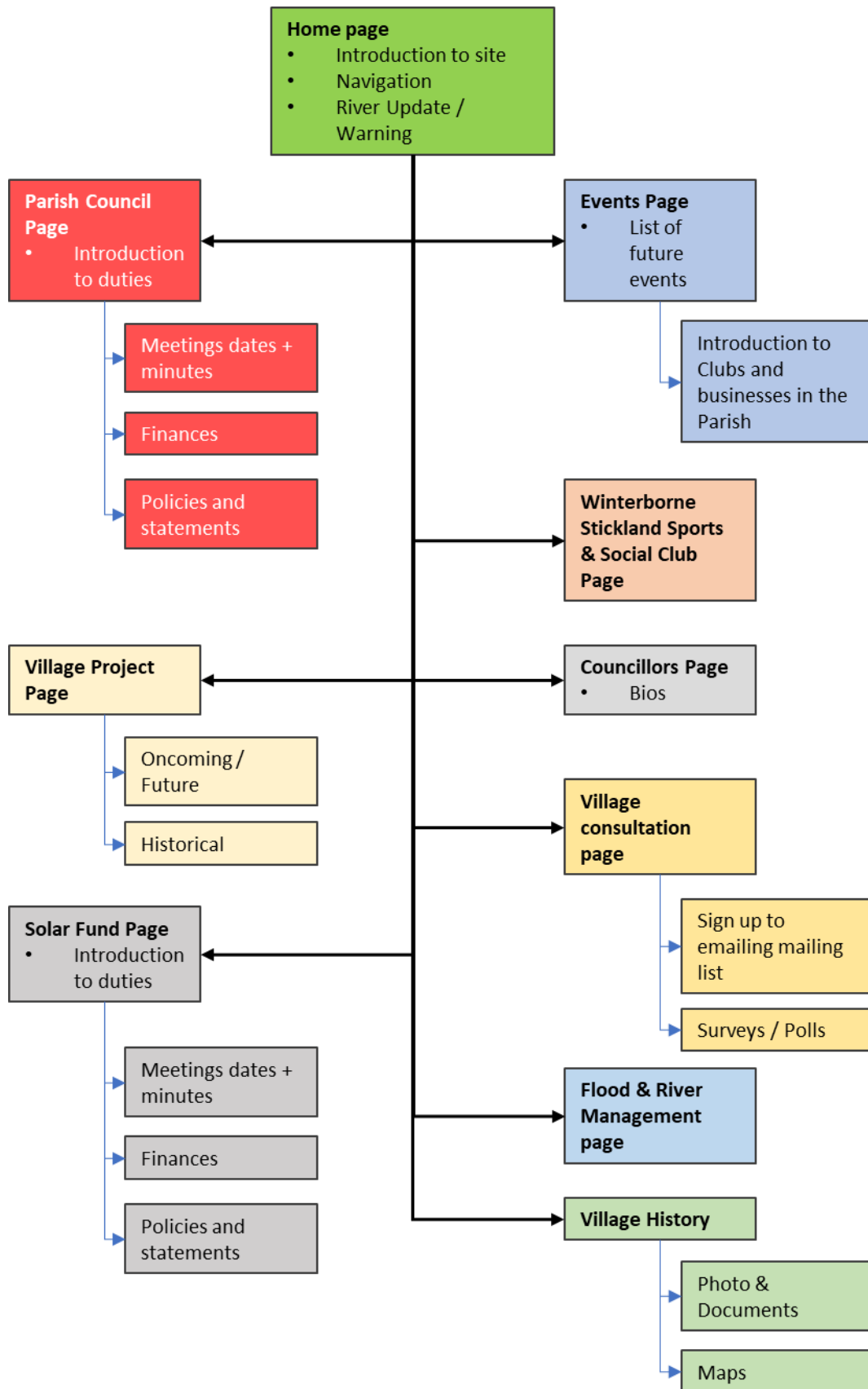
- meeting dates & agendas
- village events
- polls / consultations
- planning notices

All village communication should drive people to the website for more information and target the idea of 'be informed'. The website home page should have as a header 'sign up here'.

7. Review

This strategy requires the Parish Council to oversee the development and implementation of the strategy. This will be reviewed by the Chairman, but all substantive decisions will be taken by the full Council

Appendix 1 Website Architecture



Appendix 2 Code of Recommended Practice on Local Authority Publicity

31 March 2011

CODE OF RECOMMENDED PRACTICE ON LOCAL AUTHORITY PUBLICITY

1. I am directed by the Secretary of State for Communities and Local Government to draw the attention of your authority to the annexed code of recommended practice on local authority publicity, which has been issued under section 4 of the Local Government Act 1986. It comes into force on 31 March 2011. On the same date the codes of practice issued on 15 August 1988 (Department of the Environment circular 20/88) and 2 April 2001 (Department of the Environment, Transport and the Regions circular 06/2001) are withdrawn in relation to local authorities in England.
2. The code has been prepared following consultation with such associations of local authorities as appeared to the Secretary of State to be concerned and such local authorities with whom consultation appeared to the Secretary of State to be desirable. A draft of the code has been laid before, and approved by a resolution of, each House of Parliament.

Signed

Paul Rowsell

A senior civil servant in the Department for Communities and Local Government

The Chief Executive –
County Councils in England
District Councils in England
London Borough Councils
The Council of the Isles of Scilly
Parish Clerks of Parish Councils in
England
The Town Clerk, City of London

The Chief Officer of the –
Metropolitan Police Authority
Police authorities established under section 3 of the
Police Act 1996
The London Fire and Emergency Planning
Authority
The Broads Authority
National Parks Authorities
Joint authorities under Pt 4 of the Local
Government Act 1985
The Manchester Combined Authority

THE CODE OF RECOMMENDED PRACTICE ON LOCAL AUTHORITY PUBLICITY

Introduction

1. This code applies to all local authorities in England specified in section 6 of the Local Government Act 1986 and to other authorities in England which have that provision applied to them by other legislation. Where the term “local authorities” is used in this code it should be taken as referring to both those categories of authority. References to “the Act” are to the Local Government Act 1986.
2. Local authorities are required by section 4(1) of the Act to have regard to the contents of this code in coming to any decision on publicity. Section 6 of the Act defines publicity as “any communication in whatever form, addressed to the public at large or a section of the public”. The code therefore applies in relation to all decisions by local authorities relating to paid advertising and leaflet campaigns, publication of free newspapers and newsheets and maintenance of websites – including the hosting of material which is created by third parties.
3. Nothing in this code overrides the prohibition by section 2 of the Act on the publication by local authorities of material which in whole or in part appears to be designed to affect public support for a political party. Paragraphs 21 to 24 offer some guidance for local authorities on the management of publicity which may contain or have links to party political material.

Principles

4. Publicity by local authorities should:-
 - be lawful
 - be cost effective
 - be objective
 - be even-handed
 - be appropriate
 - have regard to equality and diversity
 - be issued with care during periods of heightened sensitivity

Lawfulness

5. Local authorities should ensure that publicity complies with all applicable statutory provisions. Paid-for advertising must comply with the Advertising Standards Authority’s Advertising Codes.

6. Part 3 of the Communications Act 2003 prohibits political advertising on television or radio. Local authorities must ensure that their publicity does not breach these restrictions.
7. Section 125 of the Political Parties, Elections and Referendums Act 2000 places a specific restriction on the publication by a local authority of material relating to a referendum under Part 7 of that Act, during the period of 28 days immediately before the referendum is held.
8. Regulation 5 of the Local Authorities (Conduct of Referendums) (England) Regulations 2007 (S.I. 2007/2089) prohibits local authorities from publishing material in the 28 days immediately before a referendum which expresses support for, or opposition to a particular answer to a referendum question relating to the constitutional arrangements of the authority.
9. Regulation 15 of the Local Authorities (Referendums, Petitions and Directions) (England) Regulations 2000 (S.I. 2000/2852) prohibits local authorities from incurring expenditure to publish material which appears designed to influence people in deciding whether or not to sign a petition relating to the constitutional arrangements of the authority, or to assist others to publish such material.

Cost effectiveness

10. In relation to all publicity, local authorities should be able to confirm that consideration has been given to the value for money that is being achieved, including taking into account any loss of potential revenue arising from the use of local authority-owned facilities to host authority publicity.
11. In some circumstances it will be difficult to quantify value for money, for example where the publicity promotes a local amenity which is free to use. In such a case authorities should be able to show that they have given thought to alternative means of promoting the amenity and satisfied themselves that the means of publicity chosen is the most appropriate.
12. If another public authority, such as central government, has issued publicity on a particular topic, local authorities should incur expenditure on issuing publicity on the same matter only if they consider that additional value is achieved by the duplication of that publicity. Additional value might be achieved if locally produced publicity gives a local context to national issues.
13. The purchase of advertising space should not be used as a method of subsidising voluntary, public or commercial organisations.
14. Local authorities should consider whether it is appropriate to seek advice from economic analysts, public relations experts or other sources of expert advice before embarking on a publicity campaign involving very large expenditure.

Objectivity

15. Local authorities should ensure that publicity relating to policies and proposals from central government is balanced and factually accurate. Such publicity may set out the local authority's views and reasons for holding those views, but should avoid anything likely to be perceived by readers as constituting a political statement, or being a commentary on contentious areas of public policy.
16. Any publicity describing the council's policies and aims should be as objective as possible, concentrating on the facts or explanation or both. Local authorities should not use public funds to mount publicity campaigns whose primary purpose is to persuade the public to hold a particular view on a question of policy. It is acceptable for local authority publicity to correct erroneous material which has been published by other parties, despite the fact that the material being corrected may have been published with the intention of influencing the public's opinions about the policies of the authority. Such publicity should seek to explain the facts in an objective manner.
17. Where paid-for advertising is used by local authorities, it should be clearly identified as being advertising. Paid-for advertising, including advertisements for the recruitment of staff, should not be used in any publication owned or controlled by a political party.
18. Advertisements for the recruitment of staff should reflect the tradition of political impartiality of local authority employees and should not (except in the case of advertisements relating to the appointment of staff pursuant to section 9 of the Local Government and Housing Act 1989 (assistants for political groups)) refer to any political activities or affiliations of candidates.

Even-handedness

19. Where local authority publicity addresses matters of political controversy it should seek to present the different positions in relation to the issue in question in a fair manner.
20. Other than in the circumstances described in paragraph 34 of this code, it is acceptable for local authorities to publicise the work done by individual members of the authority, and to present the views of those individuals on local issues. This might be appropriate, for example, when one councillor has been the "face" of a particular campaign. If views expressed by or attributed to individual councillors do not reflect the views of the local authority itself, such publicity should make this fact clear.
21. It is acceptable for local authorities to host publicity prepared by third parties – for example an authority may host a blog authored by members of the authority or a public forum on which members of the public may leave comments. Maintenance by a local authority of a website permitting the posting of material by third parties constitutes a continuing act of publication by that local authority which must accordingly have a system for moderating and removing any unacceptable material.

22. It is generally acceptable for local authorities to host publicity, such as a blog, which itself contains links to external sites over which the local authority has no control where the content of those sites would not itself comply with this code. This does not amount to giving assistance to any person for the publication of material which local authorities are not permitted to publish. However, particular care must be taken by local authorities during the period before elections and referendums to ensure that no breach of any legal restriction takes place. It may be necessary to suspend the hosting of material produced by third parties or public forums which contain links to impermissible material during such periods.
23. It is acceptable for publicity containing material prepared by third parties and hosted by local authorities to include logos of political parties or other organisations with which the third parties are associated.
24. It is acceptable for publicity produced or hosted by local authorities to include a logo associated with a particular member of the authority, such as a directly elected mayor, or leader of the authority. Publicity material produced by local authorities relating to a particular member must not seek to affect public support for that individual.
25. Where local authorities provide assistance to third parties to issue publicity they should ensure that the principles in this code are adhered to by the recipients of that assistance.

Appropriate use of publicity

26. Local authorities should not incur any expenditure in retaining the services of lobbyists for the purpose of the publication of any material designed to influence public officials, Members of Parliament, political parties or the Government to take a particular view on any issue.
27. Local authorities should not incur expenditure on providing stands or displays at conferences of political parties for the purpose of publicity designed to influence members of political parties to take a particular view on any issue.
28. Local authorities should not publish or incur expenditure in commissioning in hard copy or on any website, newsletters, newsheets or similar communications which seek to emulate commercial newspapers in style or content. Where local authorities do commission or publish newsletters, newsheets or similar communications, they should not issue them more frequently than quarterly, apart from parish councils which should not issue them more frequently than monthly. Such communications should not include material other than information for the public about the business, services and amenities of the council or other local service providers.
29. Publicity about local authorities and the services they provide should be freely available to anyone who wishes to receive such information in a format readily accessible and understandable by the person making the request or by any particular group for which services are provided.
30. All local authority publicity should clearly and unambiguously identify itself as a product of the local authority. Printed material, including any newsletters, newsheets or similar publications published by the local authority, should do this on the front page of the publication.

Equality and diversity etc

31. Publicity by local authorities may seek to influence (in accordance with the relevant law and in a way which they consider positive) the attitudes of local people or public behaviour in relation to matters of health, safety, crime prevention, race relations, equality, diversity and community issues.
32. Local authorities should consider how any publicity they issue can contribute to the promotion of any duties applicable to them in relation to the elimination of discrimination, the advancement of equality and the fostering of good relations.

Care during periods of heightened sensitivity

33. Local authorities should pay particular regard to the legislation governing publicity during the period of heightened sensitivity before elections and referendums – see paragraphs 7 to 9 of this code. It may be necessary to suspend the hosting of material produced by third parties, or to close public forums during this period to avoid breaching any legal restrictions.
34. During the period between the notice of an election and the election itself, local authorities should not publish any publicity on controversial issues or report views or proposals in such a way that identifies them with any individual members or groups of members. Publicity relating to individuals involved directly in the election should not be published by local authorities during this period unless expressly authorised by or under statute. It is permissible for local authorities to publish factual information which identifies the names, wards and parties of candidates at elections.
35. In general, local authorities should not issue any publicity which seeks to influence voters. However this general principle is subject to any statutory provision which authorises expenditure being incurred on the publication of material designed to influence the public as to whether to support or oppose a question put at a referendum. It is acceptable to publish material relating to the subject matter of a referendum, for example to correct any factual inaccuracies which have appeared in publicity produced by third parties, so long as this is even-handed and objective and does not support or oppose any of the options which are the subject of the vote.

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Appendix 3 Web Content Accessibility Guidelines (WCAG) Checklist

The Must-Have WCAG 2.1 Checklist

Practical Resource Guide

What is WCAG?

The Web Content Accessibility Guidelines or WCAG provides technical specifications to improve the accessibility of web content, websites and web applications on desktop computers, laptops, tablets and mobile devices for people with a wide range of disabilities, including auditory, cognitive, neurological, physical, speech and visual disabilities.

W3C, or World Wide Web Consortium, is a global community of accessibility experts who are striving to make the internet as inclusive as possible. The Web Accessibility Initiative (WAI) develops WCAG and related resources with input from individuals and organizations around the world.

The guidelines are mainly for the use of web content developers, web authoring tool developers and related professions; they aren't intended to be an introduction to accessibility. However, it is helpful for companies and organizations, especially employees who contribute to their digital properties, to have a general understanding of WCAG, its purpose and how it benefits not only people with disabilities, but all users.

This checklist is a practical resource guide for experienced accessibility professionals and for those newer to the industry. The first part is a primer of industry nomenclature and accessibility testing approaches. Fillable and printable checklists follow.

WCAG 2.1 Highlights

Mobile

- Improves support for touch interactions, keyboard and mouse
- Avoids unintended activation of device sensors

Low Vision

- Extends contrast requirements to graphics
- Improves text and layout adaptability

Cognitive and Learning

Disabilities

- Enables more detailed description of page controls and elements to support personalization of user interface

EN 301 549 Coordination

- Harmonized update in progress in Europe
- Particularly for expanded mobile

What's Different About WCAG 2.1?

WCAG 2.0, released nearly 10 years ago, contains 12 guidelines for digital accessibility, divided among four principles with the acronym P.O.U.R: Perceivable, Operable, Understandable and Robust. Each guideline has a list of “success criteria,” or requirements (61 in total), for making content – including text, images, sounds, code and markup – more accessible. In addition, WCAG 2.0 has three levels of conformance: **A (minimum accessibility)**, **AA (addresses the major, most common accessibility issues)** and **AAA (the highest standard)**.

The success criteria found in WCAG 2.0 are included in WCAG 2.1 – the wording of those criteria has not changed. That means that WCAG 2.1 is “backwards compatible” or, as W3C puts it, “content that conforms to WCAG 2.1 also conforms to WCAG 2.0.”

What's new about WCAG 2.1 is that it includes 17 new success criteria related to mobile accessibility, as well as provisions that will benefit more people.

		SUCCESS CRITERIA		
Level		WCAG 2.0	WCAG 2.1	TOTAL WCAG 2.0 and 2.1
A	The most basic web accessibility features	25	5	30
AA	Deals with the biggest and most common barriers for users with disabilities	13	7	20
AAA	The highest (and most complex) level of web accessibility	23	5	28
Total		61	17	78

Should You Follow WCAG 2.0 or 2.1?

WCAG 2.1 doesn't supersede or cancel out WCAG 2.0 – they are both “existing standards” – but W3C encourages organizations to use the most recent version of WCAG when developing or updating their content or digital accessibility policy.

Authorities that enforce major accessibility laws, including the *Americans with Disabilities Act (ADA)*, Section 508 of the *Rehabilitation Act*, and the *Accessibility for Ontarians with Disabilities Act (AODA)*, continue to require that organizations comply with WCAG 2.0, conformance level AA. However, this could change in the future.

If your company is in the process of making its website and other digital tools and technologies accessible and conform to WCAG 2.1 Level A and AA, it's a good idea to implement the additional 17 success criteria now to ensure maximum accessibility.

Largest Changes in WCAG 2.1: Mobile Specific Highlights

When testing mobile platforms for accessibility, individuals had to map the old WCAG 2.0 standards to mobile design guidelines to apply WCAG to mobile.

Now, new mobile requirements in WCAG 2.1 help guide the way:

Speech Input

- Character Key Shortcuts
- Label in Name

Pointer

- Pointer Gestures
- Pointer Cancellation
- Target Size

Input Methods

- Concurrent Input Mechanisms
- Motion Actuation

Device Settings

- Orientation

Other Standards that can be applicable to Mobile

- Identify Input Purpose
- Reflow
- Non-Text Contrast
- Text Spacing
- Content on Hover or Focus

Level Breakdown

Level A – 5 New Standards

[Guideline 2.1 Keyboard Accessible](#)

- [2.1.4 Character Key Shortcuts](#)

[Guideline 2.5 Input Modalities](#)

- [2.5.1 Pointer Gestures](#)
- [2.5.2 Pointer Cancellation](#)

- [2.5.3 Label in Name](#)

- [2.5.4 Motion Actuation](#)

Level AA – 7 New Standards

[Guideline 1.3 Adaptable](#)

- [1.3.4 Orientation](#)
- [1.3.5 Identify Input Purpose](#)

[Guideline 1.4 Distinguishable](#)

- [1.4.10 Reflow](#)
- [1.4.11 Non-Text Contrast](#)
- [1.4.12 Text Spacing](#)
- [1.4.13 Content on Hover or Focus](#)

[Guideline 4.1 Compatible](#)

- [4.1.3 Status Messages](#)

Level AAA – 5 New Standards

[Guideline 1.3 Adaptable](#)

- [1.3.6 Identify Purpose](#)

[Guideline 2.2 Enough Time](#)

- [2.2.6 Timeouts](#)

[Guideline 2.3 Seizures and Physical Reactions](#)

- [2.3.3 Animation from Interactions](#)

[Guideline 2.5 Input Modalities](#)

- [2.5.5 Target Size](#)
- [2.5.6 Concurrent Input Mechanisms](#)

Each of these breakdown levels link to the W3C for additional definition depth.

Testing Against WCAG 2.1

When we use the term “digital accessibility testing” we’re referring to the step-by-step process of thoroughly and diligently checking whether or not an internal or external-facing website, mobile app, software application, or LMS is usable by people with disabilities.

Proper accessibility testing of these digital properties typically involves extensive manual scrutiny of individual web pages against the WCAG 2.1 success criteria, as well as tests of various functions such as product searches and online form submissions.

It can also mean using automated testing tools to check for accessibility of various, specific elements of the digital property. The best approach is usually a combination of both.

Automated Testing

There are many tools available that will perform an automated test of certain components of a website, mobile experience, app, or electronic document. They can be quite useful for doing preliminary inspections. Accessibility experts often use various tools in concert to effectively test a website.

Automated accessibility testing is a great way to learn more about the different reasons why persons with disabilities might encounter problems. However, this form of testing has limitations. Only about 30% of the WCAG 2.0 success criteria and precisely 0% of the WCAG 2.1 success criteria can be tested using an automated tool.

There are a number of tools to conduct preliminary automated testing. It is recommended that you determine which tools will work with firewall settings and design and developer teams use the same tools. QA teams will likely leverage even more tools to ensure compliance and usability. Here is a listing of free tools for you to peruse to get you started:

Code Validation

W3C CSS Validator software was created by the W3C to help web designers and web developers check Cascading Style Sheets (CSS). It can be used on their free service on the web, or downloaded and used either as a java program, or as a java servlet on a web server. This tool will allow comparison of style sheets to the CSS specifications, helps find errors, typos, and incorrect uses of CSS. It will also advise when the CSS poses some usability risks.

Color Contrast and Color Blindness

The Colour Contrast Analyser is a downloadable tool that helps determine the legibility of text and the contrast of visual elements, such as graphical controls and visual indicators. Currently, the tool supports WCAG 2.1 compliance indicators.

Mobile Accessibility

Two tools serve the mobile accessibility space. For Android, Accessibility Scanner checks for accessibility in Android apps. For iOS, Accessibility Inspector can be used to check for accessibility. Both apps are utilized by developer and QA audiences.

Document Accessibility

The Document Accessibility Toolbar (DAT) is a dedicated accessibility ribbon menu for Microsoft Word that makes it quicker and easier to create accessible documents. This toolbar features a range of hand-picked and custom-built functions to optimize and validate a document for accessibility. The PDF Accessibility Checker PAC 3 allows for the checking of PDFs for accessibility. It works even for people that do not have Adobe Acrobat Professional.

Web Accessibility

The WAVE by WebAIM tool is one of the favorites in the industry as it uses a simple Red, Yellow, Green icon to show errors, warnings and good areas. It also has an ARIA check and color contrast analyzer built in, and you can turn on/off style sheets. Currently, it only checks against WCAG 2.0. Other tools offer specificity of analysis for content, design, developers and QA teams.

Manual and Functional Testing

Manual and functional testing are an essential component of accessibility testing. These testing types involve using human expertise to check the automated tests and then having trained teams and persons with disabilities actually engage with the digital experiences directly. There simply isn't any technology that can replace this portion of accessibility testing. When conducting a manual review, a sample test plan should include the following components:

Ensure you're testing the most accurate environments for all users:

- Check Google Analytics to determine high trafficked pages.
- Cross reference this list against WebAIM's Screen Reader Survey and Low Vision Survey.

Cross check the accessibility features with HTML 5 Browser Accessibility to ensure all features are supported

Keyboard accessibility check

Code validation check

Automated accessibility tool check

User stories for manual and functional testing:

- Develop accessibility-related user stories, such as:
 - *As a keyboard only user, I want the ability to reach all links (text or image), form controls and page functions, so that I can perform an action or navigate to the place I choose.*
 - *As a user who is hearing-impaired, I want closed captioning functionality so that I can have access to all information provided in video clips.*
- Ask yourself the questions:
 - *Why is the screen reader reading the sidebar before the main article?*
 - *Do I have to tab through every page and every navigation before getting to the content? (Why isn't there a skip to content link?)*
 - *What does image IMG_238429.jpg mean?*
 - *What did I miss on the page?*

There are a number of ways organizations can ramp up their manual testing capabilities:

Option 1

Build an in-house team of accessibility testers to perform QA on digital properties in development.

Option 2

Hire an outside consultant to systematically test the website, apps and/or electronic documents. They will provide you with a one-time report outlining the issues and barriers encountered.



Option 3

Work with an accessibility partner over time with access to a team of testers who manually check digital properties in multiple environments using different assistive technologies. These partners also work with you to develop a prioritization report outlining the critical, high, medium and low-level issues, monitor your digital properties on an ongoing basis and integrate seamlessly into your backend systems to better collaborate with your team.

WCAG 2.1 Level A Checklist

Project:

Date:

Digital Asset:

Success Criteria	Description	Notes	Pass/Fail
1.1.1 – Non-text Content	Provide text alternatives for non-text content		
121 – Audio-only and Video-only (Pre-recorded)	Provide an alternative to video-only and audio-only content		
122 – Captions (Pre-recorded)	Provide captions for videos with audio		
1.2.3 – Audio description or Media Alternative (Pre-recorded)	Video with an audio has a second alternative		
1.3.1 – Info and Relationships	Logical structures		
1.3.2 – Meaningful Sequence	Present content in a meaningful order		
1.3.3 – Sensory Characteristics	Use more than one sense for instructions		
1.4.1 – Use of Colour	Don't use presentation that relies solely on colour		
1.4.2 – Audio Control	Don't play audio automatically		
2.1.1 – Keyboard	Accessible by keyboard only		
2.1.2 – No Keyboard Trap	Don't trap keyboard users		
2.1.4 – Character Key Shortcuts	Do not use single key shortcuts or provide a way to turn them off or change them		
2.2.1 – Timing Adjustable	Time limits have user controls		
2.2.2 – Pause, Stop, Hide	Provide user controls for moving content		
2.3.1 – Three Flashes or Below	No content flashes more than three times per second		

WCAG 2.1 Level A Checklist (continued)

Success Criteria	Description	Notes	Pass/Fail
2.4.1 – Bypass Blocks	Provide a “Skip to Content” link		
2.4.2 – Page Titled	Helpful and clear page title		
2.4.3 – Focus Order	Logical Order		
2.4.4 – Link Purpose (In Context)	Every link’s purpose is clear from its context		
2.5.1 – Pointer Gestures	Users can perform touch functions with assistive technology or one finger		
2.5.2 – Pointer Cancellation	This requirement applies to web content that interprets pointer actions		
2.5.3 – Label in Name	The name contains the text that is presented visually		
2.5.4 – Motion Actuation	Functions that are triggered by moving a device or by gesturing towards a device can also be operated by more conventional user interface components		
3.1.1 – Language of Page	Page has a language assigned		
3.2.1 – On Focus	Elements do not change when they receive focus		
3.2.2 – On Input	Elements do not change when they receive input		
3.3.1 – Error Identification	Clearly identify input errors		
3.3.2 – Labels or Instructions	Label elements and give instructions		
4.1.1 – Parsing	No major code errors		
4.1.2 – Name, Role, Value	Build all elements for accessibility		

Result

WCAG 2.1 Level AA Checklist

Project:

Date:

Digital Asset:

Success Criteria	Description	Notes	Pass/Fail
1.2.4 – Captions (Live)	Live videos have captions		
1.2.5 – AudioDescription (Pre-recorded)	Users have access to audio description for video content		
1.3.4 – Orientation	Requires authors not to rely on a screen orientation		
1.3.5 – Identify Input Purpose	Ensure common names are provided using the HTML autocomplete list		
1.4.3 – Contrast (Minimum)	Contrast ratio between text and background is at least 4.5:1		
1.4.4 – Resize Text	Text can be resized to 200% without loss of content or function		
1.4.5 – Images of Text	Don't use images of text		
1.4.10 – Reflow	Your website must be responsive		
1.4.11 – Non-Text Contrast	High contrast between pieces of text and their backgrounds		
1.4.12 – Text Spacing	Text spacing can be overridden to improve the reading experience		
1.4.13 – Content on Hover Focus	Ensuring content visible on hover or keyboard focus does not lead to accessibility issues		
2.4.5 – Multiple Ways	Offer several ways to find pages		

WCAG 2.1 Level AA Checklist (continued)

Success Criteria	Description	Notes	Pass/Fail
2.4.6 – Headings and Labels	Use clear headings and labels		
2.4.7 – Focus Visible	Keyboard focus is visible and clear		
3.1.2 – Language of Parts	Tell users when the language on a page changes		
3.2.3 – Consistent Navigation	Use menus consistently		
3.2.4 – Consistent Identification	Use icons and buttons consistently		
3.3.3 – Error Suggestion	Suggest fixes when users make errors		
3.3.4 – Error Prevention (Legal, Financial, Data)	Reduce the risk of input errors for sensitive data		
4.1.3 – Status Changes	Distances between paragraphs, rows, words and characters must be able to be increased to a certain value		

Result

WCAG 2.1 Level AAA Checklist

Project:

Date:

Digital Asset:

Success Criteria	Description	Notes	Pass/Fail
1.2.6–SignLanguage (Pre-recorded)	Provide sign language translations for videos		
1.2.7 – Extend Audio Description (Pre-recorded)	Provide extended audio description for videos		
1.2.8 – Media Alternative (Pre-recorded)	Provide a text alternative to videos		
1.2.9–Audio only (Live)	Provide alternatives for live audio		
1.3.6 –Identify Purpose	Anticipates the release of cognitive metadata to be used with assistive technology to simplify interfaces		
1.4.6 – Contrast (Enhanced)	Contrast ratio between text and background is at least 7:1		
1.4.7 – Low or No Background Audio	Audio is clear for listeners to hear		
1.4.8–Visual Presentation	Offer users a range of presentation options		
1.4.9– Images of Text (No Exception)	Don't use images of text		
2.1.3 – Keyboard (No Exception)	Accessible by keyboard only, without exception		
2.2.3 – No Timing	No time limits		
2.2.4 – Interruptions	Don't interrupt users		

[2.2.5 – Re-authenticating](#)

Save user data when re-authenticating

[2.2.6 – Timeouts](#)

Users need to be warned of the duration of any inactivity that could cause data loss

WCAG 2.1 Level AAA Checklist (continued)

Success Criteria	Description	Notes	Pass/Fail
2.3.2 – Three Flashes	No content flashes more than three times per second		
2.3.3 – Animation from Interaction	Motion animation triggered by interaction can be disabled		
2.4.8 – Location	Let users know where they are		
2.4.9 – Link Purpose (Link Only)	Every link’s purpose is clear from its text		
2.4.10 – Section Headings	Break up content with headings		
2.5.5 – TargetSize	The size of the target for pointer inputs is at least 44 x 44 CSS pixels		
2.5.6 – Concurrent Input Mechanisms	Web content does not restrict use of input modalities available on a platform		
3.1.3 – Unusual Words	Explain any strange words		
3.1.4 – Abbreviations	Explain any abbreviations		
3.1.5 – Reading Level	Users with nine years of school can read your content		
3.1.6 – Pronunciation	Explain any words that are hard to pronounce		
3.2.5 – Change on Request	Don’t change elements until users ask		
3.3.5 – Help	Provide detailed help and instructions		
3.3.6 – Error Prevention (All)	Reduce the risk of all input errors		

Result



eSSENTIAL ACCESSIBILITY is a comprehensive digital accessibility platform. We help organizations create inclusive web, mobile, and product experiences through digital accessibility testing, evaluation and remediation. Organizations can then enhance the digital experience for people with disabilities, comply with regulatory and statutory accessibility standards, and project an inclusive and disability-friendly presence.

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