

International Plain Language Federation

Plain language certification for organizations: A Consultation Paper

June 2024



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Summary

Purpose

The paper was compiled by a task group of the International Plain Language Federation's Certification Committee. It explores plain language requirements for organizations that are interested in getting certified for plain language. The task group will share the paper with as many interested organizations as possible to get their input and feedback on the feasibility of these exploratory requirements.

What would it mean to be "certified for plain language"? In terms of the International Plain Language Federation's definition of plain language and the ISO Plain Language Standard (ISO 24495-1:2023) it would mean that the organization consistently and sustainably produces communication that readers/users experience as relevant, easy to find, easy to understand and easy to use.

Structure

The paper comprises three sections:

1. The first section explains the growing interest in, and demand for, plain language certification for organizations. Then it establishes a theoretical framework, firstly for the general qualities of an effective requirement standard, and secondly for this specific requirement standard. The framework for this standard distinguishes between content development requirements and enabling requirements.
2. ISO 24495-1:2023 emphasizes that the four principles (relevant, findable, understandable and usable) are interdependent and work together to create the plain language user experience. The second section explores requirements for the processes that an organization must have in place so that it can integrate the four principles when it develops communication content.
3. The third section explores the organizational structures and processes that support the content development process discussed in section 2.

Invitation to comment

The task group is inviting organizations interested in plain language certification to comment on the paper and the proposed requirements. [Click here](#) to give your feedback.

1 Introduction

1.1 Why a requirement standard for organizations?

In 2022, the Certification Committee of the International Plain Language Federation (IPLF) conducted a survey to assess the demand for certifying organizations for plain language. 117 organizations participated in the survey; 35 were plain language organizations¹ and 82 other organizations. The results showed a high level of interest in certification (77% for plain language organizations and 64% for other organizations).

The current ISO plain language standard (ISO 24495-1:2023 *Plain Language — Part 1: Governing Principles and Guidelines*) is a guidance standard and not a requirement standard. It cannot be used as the basis for certifying organizations. Furthermore, although Part 1 includes organizations in the definition of “authors”, it does not give guidance on what processes organizations must have in place to follow the standard.

The Certification Committee’s survey found that only 19% of responding organizations² had a documented process to produce communication content in plain language. Only 12% measured their plain language performance (process or outcomes). Only 5% had a budget for plain language and 24% of respondents said that their organizations did not have any plain language resources (trained writers, a plain language style guide, templates, checklists, glossaries, software). These findings align with research (Green, 2019³), which found that organizations struggled to implement plain language sustainably and systematically. Often, plain language projects are once-off, driven by a plain language champion, who is either an individual or a division of the organization.

In addition, plain language practitioners and organizations from countries with plain language legislation like the USA and South Africa have reported weak compliance enforcement (Green, 2019; Cornelius 2016⁴; Blasie, 2023⁵), which points to a lack of relevant, clear, and practical requirements.

1.2 Qualities of an effective requirement standard

An industry standard usually refers to a set of requirements that:

- reflect best practices, research findings, or other evidence, and
- stakeholders in the relevant industry accept as suitable to achieve the intended objective.

The intended objective, in this case, is an organization that consistently delivers communication content that meets the IPLF definition of plain language (2014):

A communication is in plain language if its wording, structure, and design are so clear that the intended readers can easily find what they need, understand what they find, and use that information.

Requirements must be practical: They must clearly state what organizations must do to produce the evidence that the certifying body will be looking for. And they must be realistic to achieve and to audit.

1.3 A framework for a requirement standard

The task group working on requirements for organizations developed a conceptual framework for implementing plain language in an organization. The framework distinguishes between two core aspects:

1. The organizational process to develop communication content, which ISO 24495-1:2023 implies, and
2. Organizational structures and processes that support the communication content development process referred to in 1 above. These we call enabling requirements⁶.

We define communication content as all types of messages and media that an organization shares internally among employees and externally with stakeholders such as customers, suppliers, partners, and the public (Miller & Barbour, 2015⁷). Communication content includes, but is not limited to, written documents, websites, presentations, emails, memos, reports, videos, social media posts, marketing, and instructional material. When we refer to “content” in this paper, we mean communication content.

The figure below captures the two core aspects of the framework and illustrates the relationship between the two aspects.

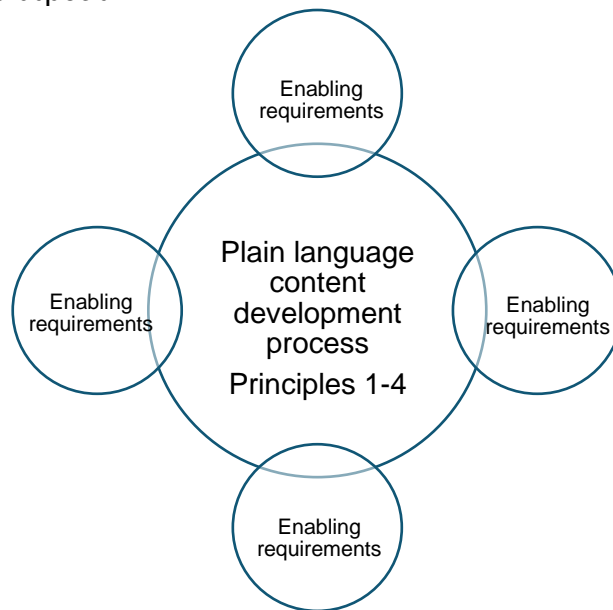


Figure 1: Framework for a requirement standard for implementing plain language in organizations

In the sections that follow, we will explore requirements for both core aspects. The requirements are in text boxes and numbered.

2 Content development requirements

2.1 A process that integrates the principles

ISO 24495-1:2023 makes it clear that organizations must apply the four principles together:

The standard does not describe a sequential process because the four principles are interdependent and influence each other. Applying them all together is crucial for developing plain language documents.

At the level of an organization, integrating the four principles implies the process illustrated in the diagram:

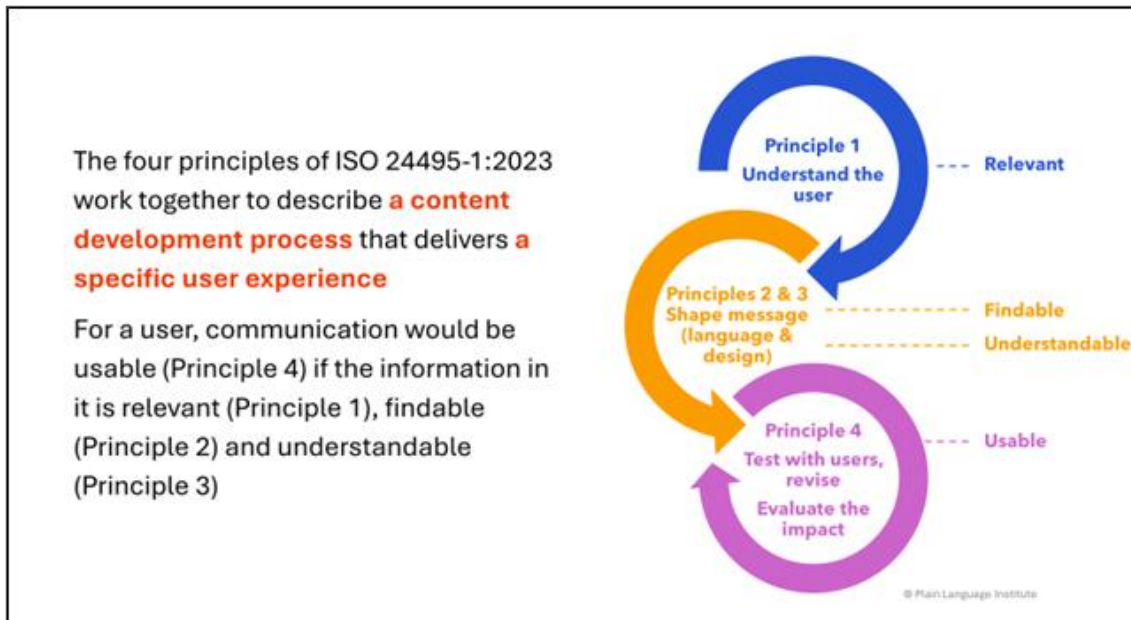


Figure 2: The four principles of ISO 24495-1:2023 work together

Below is a requirement that speaks to a process to integrate the four principles in an organization. Plus, it gives an illustrative example of what such a process could look like.

R1: The organization must provide documented evidence that it:

1. has a content development process in place that follows all four principles of ISO 24495-1:2023 in an integrated manner (see the example below), and
2. follows this process for all new content.

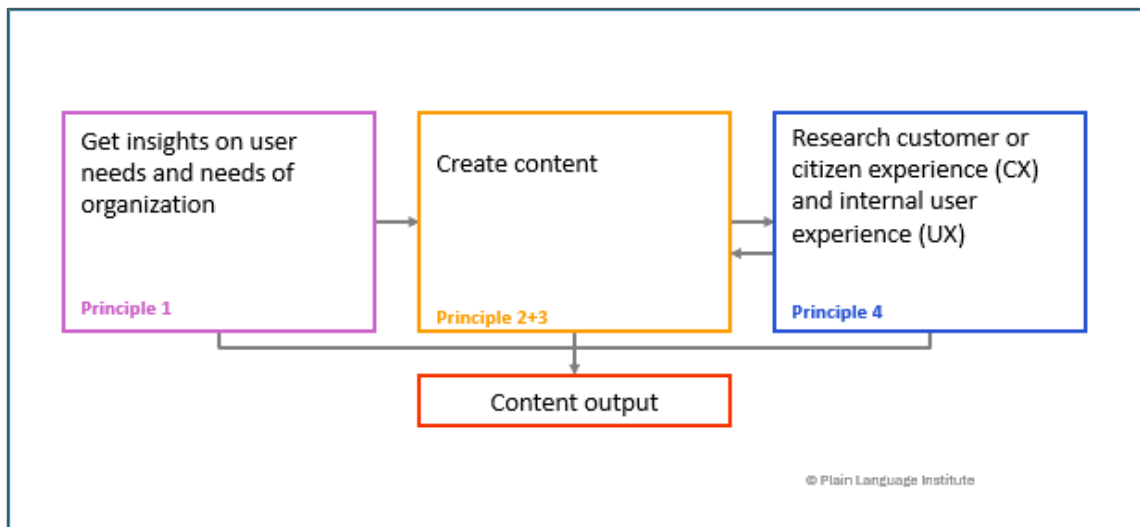


Figure 3 A corporate process designed to deliver content in plain language

The amount of content that an organization produces can be endless. For certification purposes, it would be fairer and more feasible to restrict the content to which the requirements would apply. The above requirement (R1) is restricted to new content, but it might still be too much. Other options could be new content aimed at target audiences external to the organization, strategic internal content like Board papers, staff contracts and the intranet, all content associated with new projects or products, or a combination of these.

Also, an organization might not be ready to meet all requirements across all divisions or departments but would like to get certified for what it has already achieved. A requirement standard for organizations should therefore explore certification levels, for example certification for the whole organization, certification for a division, or certification for a project.

Applying the four principles of ISO 24495-1:2023 in the organization's content development process would involve change management. We do not foresee that change management would be a requirement, but the requirement standard could include guidance on change management.

The subsections that follow deal with requirements for specific aspects of this process, as they relate to each of the four principles.

2.2 Audience research and data management

To apply Principle 1, an organization must know what its target audiences need. It must research readers' characteristics, including their cultural backgrounds, their literacy and language skills, their knowledge of the subject matter, and their accessibility needs and preferences (ISO 24495-1:2023).

Standard market research usually includes the demographic profile of audiences, and sometimes literacy and language skills. However, organizations require specialised research skills to determine the communication needs of their audiences, which will enable them to apply the guidelines for Principle 1 of ISO 24495-1:2023.

Applying Principles 1 (and 4) across an organization will generate data on user needs and user experiences. Data collection, data storage and data management will be essential for the systematic and cost-effective use of this data. For example, if the organization has already

researched user needs and stored the relevant insights in an accessible database, writers and information designers can reapply them for similar content.

Requirement R2 relates to audience research:

R2: The organization must document its process to collect, store and manage data on the communication needs of its internal and external target audiences, including:

1. demographic profile, cultural background, literacy, and language skills
2. knowledge of subject matter and questions or concerns they have
3. accessibility needs and preferences, and
4. the context and purpose of the communication from the perspective of the target audience.

2.3 Ethical content

ISO 24495-1:2023 includes guidance on ethical content as part of Principle 1. The standard describes ethical content as accurate, factually correct, not misleading, and complete without any important information hidden or left out.

R3 captures this guidance:

R3: The organization must document its quality assurance process that verifies or tests that the content it produces is accurate, factually correct, not misleading, and complete, without any hidden or missing information that readers need to make decisions.

2.4 Multidisciplinary teams

If all four principles must work together to create plain language content, it implies that people with expertise in the fields that these principles represent must work together. At the 2023 PLAIN conference, several speakers discussed case studies where multidisciplinary teams of UX researchers, different types of writers, information designers and software developers worked together to create plain language content.

Multidisciplinary teams working together to create content are already common for digital platforms like apps, but, in our experience, it not yet common in plain language projects. It is especially not common for writers and information designers to work together to create plain language content. The next requirement talks to this.

R4: The organization must demonstrate that:

1. its content development team(s) includes writers and information designers with the necessary skills and experience to apply the guidelines of ISO 24495-1:2023 for principles 2 and 3, and
2. that these writers and information designers work together to produce the organization's content.

(The enabling requirements address training and skills development.)

The term “content development team” refers to the people that develop (select, order, create, write, design, edit) the organization's communication content.

One can debate whether expertise in all four fields that the principles represent should be a requirement for all teams that develop content for their organizations.

2.5 Usable content

According to ISO 24495-1:2023, applying Principle 4 includes:

- a process to evaluate if readers can use the **outputs** of the content development process, and
- a process to evaluate the **impact** of plain language communication for readers and the organization.

The requirement below outlines what organizations must do in this regard.

R5: The organization must document its process to evaluate:

1. if the organization’s content is usable for the intended readers, and
2. the impact that plain language communication has for readers and the organization.

The evaluation process must follow the guidance provided under Principle 4 of ISO 24495-1:2023.

As part of this process, the organization must review its website (and any other key content) every year to ensure that information remains accurate and appropriate, and easy to find, understand and use.

In certain contexts, industry bodies or regulators, might decide to make R5 more specific for the organizations that they regulate. For example, the financial regulator in South Africa requires financial organizations to “test product information for its findability with the target audience before issuing it to the target audience”. It also requires financial organizations to have an approval process for all product-related information that entails senior management sign-off.

3 Enabling requirements

3.1 Commitment to plain language

Leadership commitment is necessary to drive the strategic and sustainable implementation of plain language in an organization. It is also necessary to include plain language in the roles and responsibilities of top management.

R6: The organization must demonstrate its commitment to plain language by:

1. mentioning plain language (or a similar term) in its strategic documents, such as its value statement or communication policy
2. having a plain language policy, strategy, and implementation plan in place, and
3. including the responsibility for implementing plain language in the key performance indicators of the relevant executives.

3.2 Policy, strategy, and implementation plan

The task group considered a plain language policy, strategy, and implementation plan as key enabling requirements for organizations.

ISO 9000:2015 defines policy as the “intentions and direction of an organization as formally expressed by its top management”⁸. The same source defines strategy as a roadmap “to achieve a long-term or overall objective”⁹. An implementation plan does what it says: it sets out the steps to implement the strategy.

The figure below depicts the relationship between the three:

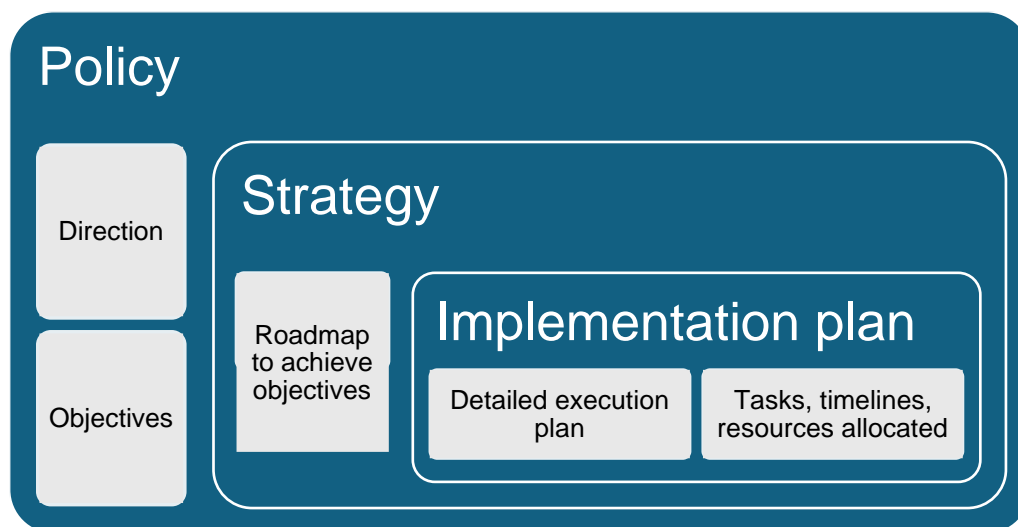


Figure 4: The relationship between policy, strategy, and implementation plan

The subsections that follow give requirements and guidelines for each of these. Some of the requirements could be guidelines, and vice versa. We must still explore this further.

3.2.1 Plain language policy

The organization's plain language policy must outline the overarching purpose and objectives of plain language for the organization. It could also outline the expected benefits of plain language for the organization. As such, the policy will provide a foundation for the organization's plain language strategy and implementation plan.

The policy itself should be relevant for everyone in the organization, and easy to find (for example on the organization's intranet), easy to understand and easy to use.

The policy could address aspects like the following:

- Legal and regulatory compliance where relevant
- How the policy aligns with the organization's values and culture
- The capacity and unique needs of the organization
- How the organization will monitor and administer the policy
- How the organization will review and update the policy.

It is more likely that the relevant stakeholders will accept the policy if it considers their needs and concerns. Getting input and feedback from the relevant stakeholders will therefore be an important aspect of the process. Often, it is staff who work close to the public or the customer who understand best what the benefits of plain language are. The team that develops the policy should include them.

The organization must communicate the policy to all stakeholders and publish it where it is visible and easy to access. It might be necessary to provide training to make sure that all employees understand the policy and the implications of non-compliance.

3.2.2 Plain language strategy

For successful implementation, the organization will need a roadmap to achieve the objectives outlined in its plain language policy.

A requirement for a plain language strategy provides such a roadmap.

R7: The organization's plain language strategy must do the following:

1. Address how plain language aligns with the organization's values and supports its strategic goals.
2. Recognize ISO 24495-1:2023 as a strategic tool to realize its values and achieve its strategic goals.
3. Acknowledge that the organization's content will be in plain language if it meets the international definition, i.e. if the intended audience/end-users experience the information as relevant, easy to find, easy to understand, and easy to use. In other words, it acknowledges that plain language is a user experience.
4. Describe how the organization will integrate user research (Principle 1), design (Principle 2), writing (Principle 3), and user testing (Principle 4) into the organization's content development process and how it will continuously engage with the intended readers/end-users of its key communication.
5. Define which resources would be necessary to achieve 4 above. This should include the competencies required to apply the four principles of ISO 24495-1:2023.
6. Identify a governance structure to drive 4 above across the organization.
7. Set out a plan to communicate the strategy to all stakeholders.
8. Identify potential risks that may impact the successful implementation of the strategy and a plan to mitigate and respond to these risks.
9. Identify mechanisms to track progress with the implementation of the strategy and evaluate the impact of the organization's content.

3.2.3 Implementation plan

The implementation plan should describe how the organization plans to roll out the strategy to transform its content development process to meet Requirements 1-5. Please note that some of the aspects mentioned in the requirements for a plain language strategy also appear in R8, the requirement that relates to an implementation plan. The focus is different. In the strategy, the organization must address these aspects from a strategic perspective; the implementation plan must deal with the detail of how these aspects translate into tasks, deliverables, and time limits.

R8: The organization must have a comprehensive plain language implementation plan that includes the following elements:

1. Clear and measurable objectives
2. Deliverables and tasks
3. Milestones and time limits for each task
4. Resources
5. Clear roles and responsibilities
6. Risk management plan
7. Communication plan
8. Quality assurance
 - a. Monitoring and testing that the process delivers communication that the intended readers experience as plain language
 - b. A continuous improvement process
9. Change management (if relevant).

3.2.4 Resources needed to implement plain language sustainably

The successful implementation of ISO 24495-1:2023 will require a specific set of resources:

R9: The organization must provide for at least the following resources to implement plain language sustainably:

1. A high-level map or picture of all content to external stakeholders (called a content ecosystem map¹⁰)
2. Accurate, retrievable, and secure database of all content it provides to external stakeholders
3. Budget necessary to execute the strategy and implementation plan
4. The necessary skills and training (details follow in requirements 10a and 10b)
5. A database of user research findings (see 2.2)
6. Style guide¹¹, glossary, checklists, templates
7. Supportive software.

The organization will need the content map and database to demonstrate that it keeps record of the content that external target audiences must experience as plain language. We narrowed the scope of this requirement to external communication to make it more feasible, but one can debate this.

The requirements below talk specifically to the skills and training. The first relates to having the necessary skills in place; the second addresses plain language training.

R10a: To ensure that it has the necessary skills and training to address all four principles of ISO 24495-1:2023, the organization must:

1. conduct a skill assessment and develop a skills development plan to ensure that it will have the required skills in place to implement its plain language strategy.
2. require that employees who develop key internal and external content have a basic knowledge of ISO 24495-1:2023 and the requirement standard, and
3. evaluate how well these employees can apply ISO 24495-1:2023.

R10b: Organizations must do the following in terms of plain language training:

1. Align any existing plain language training program with ISO 24495-1:2023 and this standard.
2. Provide plain language training for employees who do not have the required skills.
3. Provide plain language training to new employees who develop key internal and external content.
4. Continue to review plain language training needs and other opportunities for further professional development.
5. Ensure the relevant employees have access to plain language resources and current best practices.

3.3 Risks and risk mitigation

Inaccurate, unclear, unfair, or misleading content poses a significant risk to organizations. It can do irreparable damage to an organization's reputation and lead to court cases. Hence this requirement.

R11:

1. The organization's risk register (or equivalent document) must note the consequences of not using plain language.

2. The organization must have a risk mitigation process in place if any readers should complain that communication is not in plain language. For example, if the public or customers complain about inaccurate, unfair, or misleading information that the organization has provided.

This requirement should align with the ISO's risk management standards.

3.4 Monitoring and evaluating plain language implementation

The organization will need mechanisms to monitor progress, track performance and report on the status of plain language implementation and outcomes. The requirement below addresses these aspects.

R12: The organization must undertake the following monitoring and evaluation activities:

1. Report on the effectiveness of implementing plain language in its annual report. To do this, the organization must conduct internal audits or management reviews at planned intervals to measure the effectiveness of implementation.
2. At least every five years, conduct customer satisfaction studies that monitor and measure how external readers' experience the organization's communication.
3. Adapt its plain language policy, strategy, and content development process based on the above results and as necessary.
4. Identify opportunities to improve its plain language policy, strategy, and implementation plan.

3.5 An organizational culture of plain language

To meet the requirements of this standard, an organization will need a culture of clear, plain language communication. The following actions to establish and foster a plain language culture in an organization are guidelines and not requirements:

1. Making people across the organization aware of
 - a) the benefits of using plain language and the implications for the reader and for the organization of not using plain language, and
 - b) the importance and benefits of conforming to requirements of this standard within the scope of each employee's role.
2. Supporting the ongoing professional development of employees. This may include:
 - a) supporting employees to identify and address their own plain language learning needs, and
 - b) developing platforms to enable employee collaboration, sharing of successes, experiences and learnings, open discussion, and peer support.
3. Investing in the regular recognition of employees to acknowledge their plain language contributions, learnings, and achievements.
4. Conducting audits to assess plain language practice and culture and take appropriate action to address identified gaps or issues.

Annexure: list of requirements

Content development requirements

R1: The organization must provide documented evidence that it:

1. has a content development process in place that follows all four principles of ISO 24495-1:2023 in an integrated manner, and
2. follows this process for all new content.

R2: The organization must document its process to collect, store and manage data on the communication needs of its internal and external target audiences, including:

1. demographic profile, cultural background, literacy, and language skills
2. knowledge of subject matter and questions or concerns they have
3. accessibility needs and preferences, and
4. the context and purpose of the communication from the perspective of the target audience.

R3: The organization must document its quality assurance process that verifies or tests that the content it produces is accurate, factually correct, not misleading, and complete, without any hidden or missing information that readers need to make decisions.

R4: The organization must demonstrate that:

1. its content development team(s) includes writers and information designers with the necessary skills and experience to apply the guidelines of ISO 24495-1:2023 for principles 2 and 3, and
2. that these writers and information designers work together to produce the organization's content.

(The enabling requirements address training and skills development.)

R5: The organization must document its process to evaluate:

1. if the organization's content is usable for the intended readers, and
2. the impact that plain language communication has for readers and the organization.

The evaluation process must follow the guidance provided under Principle 4 of ISO 24495-1:2023.

As part of this process, the organization must review its website (and any other key content) every year to ensure that information remains accurate and appropriate, and easy to find, understand and use.

Enabling requirements

R6: The organization must demonstrate its commitment to plain language by:

1. mentioning plain language (or a similar term) in its strategic documents, such as its value statement or communication policy
2. having a plain language policy, strategy, and implementation plan in place, and
3. including the responsibility for implementing plain language in the key performance indicators of the relevant executives.

R7: The organization's plain language strategy must do the following:

1. Address how plain language aligns with the organization's values and supports its strategic goals.
2. Recognize ISO 24495-1:2023 as a strategic tool to realize its values and achieve its strategic goals.
3. Acknowledge that the organization's content will be in plain language if it meets the international definition, i.e. if the intended audience/end-users experience the information as relevant, easy to find, easy to understand, and easy to use. In other words, it acknowledges that plain language is a user experience.
4. Describe how the organization will integrate user research (Principle 1), design (Principle 2), writing (Principle 3), and user testing (Principle 4) into the organization's content development process and how it will continuously engage with the intended readers/end-users of its key communication.
5. Define which resources would be necessary to achieve 4 above. This should include the competencies required to apply the four principles of ISO 24495-1:2023.
6. Identify a governance structure to drive 4 above across the organization.
7. Set out a plan to communicate the strategy to all stakeholders.
8. Identify potential risks that may impact the successful implementation of the strategy and a plan to mitigate and respond to these risks.
9. Identify mechanisms to track progress with the implementation of the strategy and evaluate the impact of the organization's content.

R8: The organization must have a comprehensive plain language implementation plan that includes the following elements:

1. Clear and measurable objectives
2. Deliverables and tasks
3. Milestones and time limits for each task
4. Resources
5. Clear roles and responsibilities
6. Risk management plan
7. Communication plan
8. Quality assurance
 - a. Monitoring and testing that the process delivers communication that the target audiences experience as plain language
 - b. A continuous improvement process
9. Change management (if relevant).

R9: The organization must provide for at least the following resources to implement plain language sustainably:

1. A high-level map or picture of all content to external stakeholders (called a content ecosystem map¹²)
2. Accurate, retrievable, and secure database of all content it provides to external stakeholders

3. Budget necessary to execute the strategy and implementation plan
4. The necessary skills and training (details follow in requirements 10a and 10b)
5. A database of user research findings (see 2.2)
6. Style guide¹³, glossary, checklists, templates
7. Supportive software.

R10a: To ensure that it has the necessary skills and training to address all four principles of ISO 24495-1:2023, the organization must do the following:

1. Conduct a skill assessment and develop a skills development plan to ensure that it will have the required skills in place to implement its plain language strategy.
2. Require that employees who develop key internal and external content have a basic knowledge of ISO 24495-1:2023 and the requirement standard.
3. Evaluate how well these employees can apply ISO 24495-1:2023.

R10b: Organizations must do the following in terms of plain language training:

1. Align any existing plain language training program with ISO 24495-1:2023 and this standard.
2. Provide plain language training for employees who do not have the required skills.
3. Provide plain language training to new employees who develop key internal and external content.
4. Continue to review plain language training needs and other opportunities for further professional development.
5. Ensure the relevant employees have access to plain language resources and current best practices.

R11:

1. The organization's risk register (or equivalent document) must note the consequences of not using plain language.
2. The organization must have a risk mitigation process in place if any readers should complain that communication is not in plain language. For example, if the public or customers complain about inaccurate, unfair, or misleading information that the organization has provided.

R12: The organization must undertake the following monitoring and evaluation activities:

1. Report on the effectiveness of implementing plain language in its annual report. To do this, the organization must conduct internal audits or management reviews at planned intervals to measure the effectiveness of implementation.
2. At least every five years, conduct customer satisfaction studies that monitor and measure how external readers' experience the organization's communication.
3. Adapt its plain language policy, strategy, and content development process based on the above results and as necessary.
4. Identify opportunities to improve its plain language policy, strategy, and implementation plan.

Endnotes

¹ The paper distinguishes between plain language organizations, that is organizations that offer plain language services as their core business, and other organizations, which do not have plain language as their core business but have an interest in plain language and aim to achieve it in their communication.

² The percentage refers to organizations whose core business is not plain language.

³ Green, N. 2019. *Towards a conceptual framework for implementing Plain Language as a strategic priority in organizations*. Unpublished Masters dissertation. Pretoria: University of Pretoria.

⁴ Cornelius, E. 2016. An appraisal of plain language in the South African banking sector. *Stellenbosch Papers in Linguistics*, Vol. 46, pp25-50. Downloaded from <https://journals.co.za/doi/pdf/10.5774/46-0-229>.

⁵ Blasie, Michael. 2023. Regulating Plain Language. *Wisconsin Law Review*. 687 (2023), Available at SSRN: <https://ssrn.com/abstract=4318216>

⁶ The enabling requirements are “translations” of criteria and requirements from three sources that focus on organizational structures and processes: Two business excellence models ([EFQM Model](#); [Baldrige Excellence Framework](#)), ISO 9001, and the compliance criteria for Outcome 3 of Treating Customers Fairly. In addition, we added requirements that task group members sourced from their own experience as plain language practitioners in organizations.

⁷ Miller, K. & Barbour, J. 2015. *Organizational Communication: Approaches and Processes*. 7th Edition. Cengage Learning.

⁸ ISO 9000:2015, 3.5.8

⁹ ISO 9000:2015, 3.5.12

¹⁰ A content ecosystem includes the full set of content types, teams, technologies, and/or channels of an organization, as well as the target audiences for each type of content, and the goals and metrics associated with each piece of content (<https://www.braintraffic.com/insights/an-introduction-to-content-ecosystem-maps>).

¹¹ This could be a reference to a national style guide such as the Australian Style Guide.

¹² A content ecosystem includes the full set of content types, teams, technologies, and/or channels of an organization, as well as the target audiences for each type of content, and the goals and metrics associated with each piece of content (<https://www.braintraffic.com/insights/an-introduction-to-content-ecosystem-maps>).

¹³ This could be a reference to a national style guide such as the Australian Style Guide.