



Gangmasters &
Labour Abuse Authority

External Communications Policy

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<i>Author: Paul Coffey</i>			<i>Director: Darryl Dixon</i>	
			<i>Approver: EMT</i>	
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1 Introduction

1.1. This policy governs the GLAA's release of information in the following situations and should be read in association with other relevant GLAA policies.

- Intelligence
- Sharing information with law enforcement, other Government Departments, and regulatory authorities (including overseas authorities) Inspections
- Criminal investigations
- Refusals to grant a licence
- Revocations of a licence
- Information issued to the press on a refusal or revocation
- Release of information to Board members and other stakeholders
- Release of information concerning appeals
- Appeal results
- Freedom of Information
- Data Protection requests
- Advice and guidance
- Active checks
- Complaints
- Research

1.2 The GLAA's approach to the release of information has regard to:

- Better regulation principles of being accountable, and
- Relevant statutory obligations

2 Intelligence

2.1 The GLAA receives information from a range of sources, including workers, labour users, other labour providers, etc. The information provided will inform a risk assessment which may or may not justify an investigation/inspection. Where possible the GLAA will acknowledge receipt of that information, in the form received (e.g. email response to an email), and where the information is not from an anonymous source.

- 2.2 The GLAA cannot provide information on how it is using that information, whilst it may form the basis for an inspection or investigation as such disclosure may “tip off” those who are being investigated and be counter-productive to identify criminality and non-compliance.
- 2.3 If an informant seeks feedback on the outcome of an investigation the GLAA may provide a response at the conclusion of the investigation. Any release of information will meet the criteria for release of information set out in the sections below (e.g. re press, Freedom of Information requests).

3 Sharing information with law enforcement, other Government Departments, and regulatory authorities (including overseas authorities)

- 3.1 The GLAA may share information with law enforcement, other Government Departments, and regulatory authorities (including overseas authorities) where the information is considered relevant to the other body’s enforcement responsibilities. This may occur during the criminal or civil process, and after any prosecution or appeal decision. For example, information after a GLAA appeal decision may be disclosed to the Insolvency Service. This can include access to any documents or copies of documents held by the GLAA.
- 3.2 Such disclosures will be covered by section 19 of the Gangmasters (Licensing) Act 2004, or the information exchange provisions and powers to request information in another enforcement bodies own legislation. Disclosures undertaken through these legal gateways do not breach the Data Protection Act 1998, and are covered by the exemption in section 35 of that Act.

4 Inspections

- 4.1 When the GLAA decides to undertake an inspection it will normally give a labour provider notification of its intention to do so, indicating when it will visit. On arrival they will always provide proof of their identity as GLAA officers
- 4.2 In certain circumstances, dependent on the information received by the GLAA, it will not be appropriate to provide advance notification, where to do so may result in evidence of non-compliance being hidden. If reasonable access is denied, consideration of an offence of obstruction may arise.
- 4.3 If the inspection is to be notified, the inspector who will undertake the inspection will send a letter to indicate the date of the inspection. It will be accompanied by the Inspection information sheet. You can read the information contained in that document [here](#).
- 4.4 If the inspection is not notified the inspector should issue a copy of the inspection information sheet on arrival to conduct the inspection.
- 4.5 The inspector:
- Will review a labour provider’s compliance against the licensing standards

- May need to interview labour users and workers (who may subsequently ask the labour provider or the GLAA about the inspection as a result of their interviews) and ask the Principal Authority to explain any issues that indicate potential non-compliance
- Explain the identified areas of non-compliance at the end of the inspection, if this has not been done during the inspection, which will be reported to the licensing team
- Explain what happens next, in terms of the submission of the report to the licensing section to make a decision on the inspection report
- Include any evidence obtained, or additionally represented by the labour provider, together with any explanations given, as part of the submission of the report
- Will explain whether time will be allowed to correct minor issues within a specified period of time, with confirmation that the labour provider has done so, but that such matters will still be reported
- Will **not** make a decision on whether the licence is to continue unchanged, or be revoked, or have additional licence conditions added (this is a matter for a formal decision by the GLAA licensing team)
- Will be responsible to advise on progress after completion of the report up to its submission to the licensing section, if there is to be any delay
- Will advise the PA when they have sufficient information to submit the report, if further correspondence after the inspection was necessary to clarify any point, or in relation to documentation that was agreed to be provided.
- Will not discuss the potential outcome of an inspection with a labour user, or anyone other than the nominated representatives of the licence holder (any such questions should be addressed directly to the GLAA Head office)

Further information is available in [GLA Brief 26](#)

- 4.6 When the inspection is submitted to the licensing section, they will advise the labour provider that they have ownership of the report and if there is likely to be a delay in issuing a decision after receipt of the inspection report by licensing. From that point, any questions regarding the progress of the report should be addressed to the licensing section at: licensing@gla.gov.uk.
- 4.7 When the inspection is submitted to the licensing section, an active check notification will be triggered when a decision is made. However, the information of a completed inspection report may be added to the GLAA's inspection list on its website, before this, at the monthly update. A labour user, or anyone who has registered an active check interest in a particular labour provider, will receive a notification that an inspection has occurred.

- 4.8 When the inspection is submitted to the licensing section it will be added to the public list of inspected labour providers. The list is normally updated on a monthly basis. The list, ordered by year, can be found [here](#) and is maintained in line with the GLAA retention policy as set out at paragraph 20.
- 4.9 The GLAA will not usually issue a press release when an inspection has occurred (see section 6 and 7 below on when it will normally consider issuing a press release). If information is sought by the media about third parties it will normally be considered specifically under the procedures relating to Freedom of Information requests (see below) or could be an enquiry directed to the GLAA's Communications and Engagement Team. In any such consideration the GLAA will take account of the public interest, and the need to correct any misunderstanding or misinformation.
- 4.10 The GLAA regularly receives requests from the press to accompany officers on operational activity. Journalists will be permitted to accompany officers on official activities only when their presence is considered appropriate, and when they are invited to do so by the GLAA. Requests from the media will be considered on a case by case basis and any media representatives accepted will be accompanied throughout by a GLAA officer. In these cases journalists will be asked to sign a [media indemnity agreement](#).
- 4.11 Assistance will be given to the media to secure permission for access from the relevant party. In cases where access is denied, the GLAA accepts no responsibility for press photographers and/or cameramen who attempt to take images and/or footage from the public highway.
- 4.12 Where operations are organised in partnership with one or more other agencies, agreement will be sought between the GLAA and all other respective communications representatives prior to inviting along representatives of the media.

5 Criminal Investigation

- 5.1 The nature of criminal investigation means that labour providers or labour users who are subject to such investigations will not be notified of them. They will become aware during a GLAA visit to conduct the investigation.
- 5.2 GLAA criminal investigations, and disclosure in relation to them, will follow the Codes of Practice issued in relation to the Police and Criminal Evidence Act 1994, and the Criminal Procedures and Investigation Act 1996, in England and Wales, and the equivalent guidance in Scotland and Northern Ireland.
- 5.3 When a criminal investigation results in an arrest, or otherwise comes to the attention of the public and press, the GLAA may issue a proactive/reactive media release. This approach is in line with the GLAA's strategic objective to *disrupt criminal activity within the labour market*. In all cases media releases will comply with relevant legislation (ie Contempt of Court Act 1981) and recommended media guidelines for law enforcement published by the [College of Policing](#).

- 5.4 The GLAA will name individuals who are charged with an offence unless there is an exceptional and legitimate purpose for not doing so, or reporting restrictions apply. We will proactively release charging information where the crime is of a serious nature, where the incident has already been reported in the media or on social media sites, or for public reassurance reasons. If charges are withdrawn before someone first appears in court, the GLAA will proactively release this information as soon as possible in order to be fair to the person(s) involved, especially if a case has been previously publicised. Ultimately, the responsibility for accurate reporting lies with the media.
- 5.5 At the conclusion of a prosecution the GLAA may seek to proactively publicise the outcome. This could involve a media release, and article on our website and/or social media messaging. The GLAA may also proactively contact members of the media to alert them to it where the GLAA considers that greater public awareness is in the public interest and assists in its prevention and deterrence messages.

6 Refusal to grant a licence

- 6.1 The GLAA will consider press releases and contact with the press where appropriate (in line with paragraph 5.5), where a licence is refused.
- 6.2 If the applicant does not appeal the decision the GLAA may consider it appropriate to issue a press release. It may do so, for example, where the evidence resulting in the refusal indicated significant non-compliance, and exploitation of the workers, or where the applicant was previously revoked. Each case will be considered on its merits, with regard to public interest.
- 6.3 If the applicant does appeal the GLAA will not normally consider a press release until the outcome of the appeal. At the conclusion of the appeal, the GLAA will consider whether a press release is appropriate, considering issues covered in paragraph 6.2. It will also consider whether the appeal outcome identifies issues that are considered to be novel or cover a contentious issue of interest to GLAA stakeholders, or set a precedent in the GLAA's approach, on which the GLAA needs to raise awareness.

7 Revocations

- 7.1 Where the GLAA revokes a licence "with immediate effect", a press release is usually issued immediately.
- 7.2 Where the GLAA revokes without immediate effect and the labour provider can continue to trade, the GLAA will not normally issue a press release until the time for an appeal has elapsed or the appeal has been lost or withdrawn by the labour provider.
- 7.3 The exception to (7.2) is where the justification for the revocation is already in the public domain or there are exceptional public interest reasons to publicise the decision, and it is in the public interest to be open about the GLAA decision.

- 7.4 Where information is already in the public domain it is important for the GLAA to clarify matters so that there is no misunderstanding or misinformation.
- 7.5 The GLAA may consider exceptional public interest reasons, for example, where revocations that are based on licensing standards score of 120 or more points, or in circumstances where the business is no longer trading (for example, if the principal authority is on remand).
- 7.6 Where press releases are not issued for revocations without immediate effect, at the time of the decision, the GLAA will continue to:
- issue press releases at the end of the appeals process (subject to the appellant losing), and
 - add an entry to the GLAA list of revoked licences (which also states if a business has successfully applied for a new licence). This list will be maintained in line with the GLAA retention policy as set out at paragraph 20.
- 7.7 The GLAA will generally not issue a press release for businesses who have been revoked without immediate effect and who successfully apply for a new licence (unless there are the exceptional circumstances mentioned in paragraph 7.3 - 7.4 above). This is because if a business is able to demonstrate a commitment to enhance standards, it would be disproportionate to publicise a revocation.

8 Information issued to the press on a refusal or revocation

- 8.1 The following list sets out the information the GLAA will normally provide in a press release:
- List of licensing standards breached
 - Name of principle authority of revoked or refused labour provider business.
 - Contact details of the labour provider business that is subject to revocation or refusal (including business address and business telephone number).
 - Sector the labour provider supplied to (e.g. fresh produce, food processing), or whether the applicant was a specialist labour provider (e.g. payroll company).
 - Crop picked or packed (e.g. carrots, potatoes, salads, ready meals, etc.).
 - Number of workers provided (if the information is available).
 - Nationalities of workers exploited (if the information is available).
 - Notification of labour users connected to the revocation (if the information available and has been confirmed).

9 Issue of press releases and awareness of related broadcast and published articles to Board members and Supermarket and Supplier signatories

- 9.1 Media releases regarding the outcome of criminal activity or revocations and refusals may be released to GLAA Board members, in advance of release into the public domain. Such releases will be embargoed from further dissemination until the date of the public press release.
- 9.2 Where the GLAA is to appear, or be referred to in any printed or broadcast article, concerning its activities, the GLAA will endeavour to notify Board members and Supermarket and Supplier signatories to such articles, in case they are asked to comment. In practice, this may not always be possible due to the timing of such requests. In such situations, the GLAA will aim to make Board members and Supermarket and Supplier signatories aware as soon as possible after broadcast or publication.
- 9.3 Whenever practicable the GLAA will share the findings of any enforcement action or investigation within the supply chain, adhering to the principles and approach set out above in paragraph 5.3 . All parties in receipt of confidential information shared this way will maintain it as strictly confidential. Information will only be shared externally where there is considered to be a significant risk to both workers and/or to the supply chain. In these cases the supplier and/or retailer and the GLAA will meet or liaise to consider any required action. In all other appropriate cases the GLAA and the supply chain will agree to work together to resolve any identified issues involving labour providers.
- 9.4 The GLAA will not pass on or share such information with any stakeholder unless it is considered necessary, legitimate, proportionate, relevant or justified to do so. Any intelligence or information received by the GLAA will be assessed, graded and subject to investigation prior to any decision being taken over stakeholder engagement.
- 9.5 It should also be recognised that there will be situations, due to the sensitive nature of some enquiries, which for operational or practical reasons, prior notice of a media release or broadcast or publication of articles may not be provided.

10 Release of information regarding appeals

- 10.1 Documents to be disclosed to an appellant in an appeal will be subject to the rules on civil disclosure and the GLAA's appeal regulations. More information on appeals can be found [here](#).
- 10.2 Requests for any other document by the appellant labour provider, or third parties, will be considered under the procedures for Freedom of Information requests.
- 10.3 Information on appeals will not otherwise normally be issued. In considering such requests, which will be treated as Freedom of Information requests, the GLAA will weigh up public interest considerations, whether doing so may adversely affect a labour provider's ability to trade during an appeal, and the impact it may have on ensuring a fair hearing.

- 10.4 However, there are circumstances when releasing information as early as possible would be beneficial. Equally, some refusal decisions present a similar necessity to release information early. There have been a number of cases that have been subject to revocation without immediate effect but the basis of the decision is extremely serious, particularly where the decision was border line for revoking 'with immediate effect'. In such cases, there is a more compelling public interest in issuing a press release at the time of the decision.
- 10.5 While publicising information earlier would improve the openness of the GLAA's decision making, there is clearly a balance to be struck with respecting someone's ability to trade legally during the period running up to an appeal. The GLAA will consider the merits of disclosure on a case by case basis, and in particular whether it is required to do so under its obligations under the Freedom of Information Act where a public interest test may outweigh the application of an exemption, in accordance with the Information Commissioner's Office guidance.
- 10.6 If information is sought by a third party on whether an appeal has been made by a labour provider, and, if so, the date set for any appeal, they should contact the Gangmasters Appeals Secretariat:
- Alexandra House
14-22 The Parsonage
Manchester
M3 2JA
- 10.7 Furthermore, it should be noted that a GLAA appeal hearing is a public hearing that anyone may attend or report on. If such reports are in the public domain there may be a compelling justification for the GLAA to respond to such publicly available statements to ensure that there is no misinformation or incorrect information. It may do so in a media release or statement at the GLAA Board, or both.
- 10.8 As a courtesy, the GLAA may advise the other party of its intention to do so but it is the GLAA's prerogative what such statements will say, where appropriate.
- 10.9 During the preparation for an appeal it may be necessary for the GLAA or its legal representatives to contact third parties (e.g. labour users or workers) to obtain witness statements that it intends to rely on in the defence of its decision. The GLAA recognises that this may result in such parties effectively obtaining information on the state of a labour provider's licence, and may result in them disclosing such information to third parties. Nonetheless, whilst recognising such risks may arise, the GLAA will undertake such action where it is necessary to the proper development of its appeals.

11 Appeal results

- 11.1 At the conclusion of the appeal the GLAA will consider the issue of a media release. It will cover the issues set out in section 8 above.
- 11.2 The GLAA will also publish the appeal decision on its website.

12 Freedom of Information

- 12.1 Where the GLAA receives a request for information from the media, or other party, on the action the authority may be taking, which may include a request for an inspection report or licensing decision, the GLAA will consider whether an exemption applies. This may normally be under sections 30 (Investigations and proceedings conducted by public authorities), section 31 (Law enforcement), of the Freedom of Information Act (FOIA).
- 12.2 Generally, the GLAA will not release information that specifically relates to an ongoing compliance or criminal investigation matter. However, section 30 and section 31 exemptions are qualified exemptions; an absolute exemption does not apply in such situations the GLAA will consider whether release in the public interest outweighs any consideration to exempt. Each case will be decided on its merits. This is in accordance with Information Commissioner's Office guidance^[1].
- 12.3 A FOIA request will be acknowledged within 5 working days, and responded to within 20 working days. If there are reasons for delay the requestor will normally be notified of such delay, with an indication of the likely response date.
- 12.4 In accordance with the duty to assist FOIA requests the GLAA will point to any general advice is pertinent to the request and advised where it can be found (for example on the GLAA website).
- 12.5 If the request relates to information, for example about a specific labour provider, a courtesy letter will be issued to the labour provider to notify them of the request, that the identity of the requestor cannot be disclosed, and of the proposed response. In such circumstances the labour provider may wish to submit observations on the GLAA's intended response. The GLAA will allow a period of five working days for the company to provide any comments it wishes to make. Such submissions will be considered but the final response is the GLAA's decision alone. However, the GLAA's response will not be delayed by such considerations where it can appropriately meet the required timescales to respond. In cases where the subject of the request is no longer in existence (for example – requests for information about companies that have subsequently been liquidated) the GLAA will not issue a courtesy letter.
- 12.6 The GLAA will not issue courtesy letters to the subjects or FOIA requests where such notification may act as a "tip off" that there is an active criminal or compliance investigation, but the GLAA would consider the release of information would normally be exempt from release in such circumstances.
- 12.7 If a requestor is seeking general information which requires information on a number of different labour providers (e.g. details of all labour providers where a refusal identified non-compliance with a specific licence standard) the GLAA will not issue such courtesy letters. However, the information provided will be redacted before issue – for example the names of a labour provider will be removed from any licence decision or other document issued to meet the request.

- 12.8 If a general request, as above, is used to narrow down a requestor's interest to a specific company or individual, which results in a subsequent FOIA request, a courtesy letter will be issued to that person, as above.
- 12.9 If the nature of the request, though framed generally, results in the identification of a small number of labour providers, from which their identities may be determined, the GLAA will consider issuing a courtesy letter as set out above.
- 12.10 If the request relates to a matter that is not in the public domain, and is subject to GLAA compliance action, the GLAA will consider release of the information to be exempt and rely upon "neither confirm nor deny" procedures^[2].
- 12.11 If the matter that is in the public domain (for example knowledge of a labour provider's inspection exists because it has been added to the public inspection list) the GLAA will not rely on the "neither confirm nor deny" procedures. Instead, it will consider whether an exemption under section 30 or section 31 applies, or if the application of the public interest test favours disclosure.
- 12.12 For example, if the request relates to whether an inspection has occurred, which is being compiled, the GLAA will rely on the exemption in section 31(3), neither confirming nor denying whether an inspection has occurred. If the inspection has been submitted to licensing, and the fact of an inspection appears on the GLAA's website list of inspected companies, the GLAA may rely on section 31(1) (g) until such time as a licensing decision is made. However, although the GLAA will not normally issue a press release on revocations without immediate effect, once a decision has been made and communicated to the labour provider, the GLAA will not normally exempt information from that point going forward if an FOIA request is received. It will consider whether any other exemption applies, for example section 43 on prejudice of commercial interests^[3], but as this is not an absolute exemption it will assess whether the balance of the public interest test is in favour of disclosure.
- 12.13 A request for details of information that the GLAA has provided to another Government Department, where there may be ongoing compliance or criminal investigation by the GLAA or the other Department will normally be subject to exemption from release to the requestor. Each case will be considered on its merits, and whether the matter has come to conclusion (e.g. an appeal outcome or prosecution decision).
- 12.14 As an additional service to the public, improving transparency, the GLAA will also publish responses to FOIA requests. It will do so having regard to whether the information sought was subject to an exemption from release, in part or completely.
- 12.15 Published FOIA responses will cite the question and answer provided, but not the details of the person or organisation making a request.
- 12.16 Generally, where the information sought relates to operational matters, tactical approaches, or specific open inspections and operations details will not be published. However, where a request for details and documents in relation to a closed inspection was received, and documents were issued in the response

(where the presumption on disclosure in the public interest outweighed arguments for exemption), the GLAA may also consider the publication of those documents to be appropriate when it publishes the FOI response.

- 12.17 Where a request related to details on an identifiable individual or company, to which an FOIA exemption did not apply, consideration will be given to publication of the response issued in full. In such circumstances, the GLAA will advise the person or company referred to in the FOIA before publication occurs, setting out the response, and whether, in relevant cases, it intends to include documents issued in that publication. A period of five working days will be allowed for the company to provide any comments it wishes to make. The GLAA will consider such submissions, but the final response is the GLAA's decision alone. This approach to the subject of the FOIA is in addition to any previous approach in accordance with paragraph 12.5.

13 Data Protection requests

- 13.1 A labour provider might make a request for information held by the GLAA about themselves. Such requests are "subject access requests" in accordance with the Data Protection Act 2018 and will be dealt with under the requirements of that Act. Any requests for information should be emailed to dataprotection@gla.gov.uk. Further information can be found on the Information Commissioner's website^[4].

14 Advice and guidance

- 14.1 The GLAA will issue guidance to clarify its approach to determine compliance, and explain changes using the GLAA Brief series, which can be found [here](#).
- 14.2 The advice and guidance available on the GLAA website will be reviewed to make sure it is easy to access and understand. Where possible, information will be consolidated to avoid repetition. Translating relevant information for labour providers based outside the UK will also be considered.
- 14.3 The GLAA will also work with industry to produce appropriate best practice guidelines in order to raise compliance levels (for example, the charge rates guidance^[5]).

15 Active checks

- 15.1 Anyone can subscribe to the active check process which allows an individual to receive notifications about changes to a labour provider's licence. Further information on that process can be found [here](#).

16 Complaints

- 16.1 A complaint may be received concerning the GLAA procedures, or the actions of its staff. It may set out concerns regarding disclosure of information about a labour provider or labour user, which may have occurred in the circumstances above. The GLAA has a formal [complaints procedure](#) which is published on the website.

- 16.2 A complaint may be made by writing to the GLAA at complaints@gla.gov.uk or by post to PO Box 10272, Nottingham, NG2 9PB.
- 16.3 If a complaint is simple it may be responded to within 5 working days. More complex complaints may take longer, and the GLAA will aim to respond within 20 days of receipt of the complaint by the complaint investigator. If the complaint cannot be completed within 20 days the GLAA will write to the complainant to indicate that the 20-day period cannot be met, and indicate when it is likely to be concluded.
- 16.4 If a complainant is dissatisfied with the response provided by the complaint investigator they may appeal against the decision by writing to the GLAA Chief Executive. The timescales highlighted in 16.3 above will also apply to the response provided by the Chief Executive.
- 16.5 The GLAA recognises that longer periods may be required where the investigation of a complaint requires interviews with various individuals. The circumstances of the complaint may necessitate interviews with third parties, such as (but not limited to) labour users and workers.
- 16.6 The GLAA recognises that interviews with third parties concerning a complaint may inadvertently create a release of information. The GLAA will be sensitive to this risk, and only interview third parties where this is considered essential to the proper investigation and conclusion of a complaint. In such situations, the GLAA will advise the complainant of the approach that it will take to ensure a thorough examination of the complaint can be conducted. A complainant may prefer that this does not occur, in which case the GLAA will make the final decision, having regard to whether this will prevent an objective assessment of the complaint. It will not normally comment on the circumstances of the complainer in those situations. Nonetheless, the GLAA recognises that the person interviewed may use such information which will then be beyond the control of the GLAA.

17 Research

- 17.1 The GLAA receives numerous requests for assistance on research on forced labour, and related subjects by academics, and for Government reports. Where possible, subject to resources, the GLAA will assist with requests for information. Such information will normally be volumetric (e.g. numbers of cases of revocation involving specific standards) and anonymised where it relates to particular situations.

18 Engagement with Media/Documentary communications companies

- 18.1 The GLAA is regularly approached by TV production companies seeking permission to document its activities, particularly those around its enforcement activities (execution of warrants, arrests, etc).
- 18.2 Requests are considered on a case by case basis, ensuring that any agreement to participate will not adversely affect the outcome of ongoing operations which may be filmed. Companies requesting access are researched to check on their suitability for collaboration and previous portfolios of programmes. They are also

asked to provide background information, outlining what they intend their finished project to show, with specific reference to the aspects of the work of the GLAA they will include.

- 18.3 The GLAA will carry out a 'risk assessment' that the potential exposure to reputational damage respective projects might cause, weighed against the protection of vulnerable workers, public information, positive messaging and wider public understanding of what the GLAA does and why.
- 18.4 Other factors considered include: the amount of staff time and resources required to facilitate the requirements of the production teams and whether partner agencies have also agreed to participate in a specific project. This will be continuously assessed to ensure that the duty of care to workers always takes primacy.
- 18.5 All partner agencies involved in any activity to be filmed must be contacted and be in agreement with any request for filming to enable it to take place. Requests from production teams that already have partner agencies' support to assist will be viewed more favourably, but each one will be considered on its merits and how it meets the overarching aim of the GLAA.
- 18.6 In considering all requests, the welfare and safety of the workers is paramount. No projects or filming will be agreed or permitted by the GLAA if vulnerable and exploited people are placed in a position of risk.
- 18.7 Journalists accompanying the GLAA on its day to day activity and whether as part of background information gathering or for live/pre-recorded broadcast/publication, will be asked to sign a media indemnity agreement. 18.8 See also paragraphs 4.10 - 4.12 regarding visits to premises accompanied by media representatives.

19 Use of Social Media

- 19.1 The GLAA has a presence on a number of social media platforms as part of its ongoing engagement with the public and stakeholders and its use on these platforms should comply not only with this policy but also with its own internal Social Media Policy, which is aligned to Home Office guidance on the use of such platforms.
- 19.2 Adhering to the Home Office guidance , the GLAA will employ social media if the information being released:
- Complies with wider GLAA policy and is therefore adjudged as being appropriate for distribution and beneficial to the organisation
 - supports the authority's main strategic aim and priorities
- 19.3 The organisation uses platforms such as Twitter, Facebook, YouTube and others to promote the work of the GLAA and to raise awareness of labour exploitation issues.

- 19.4 The GLAA also promotes/shares messages from partner organisations and/or stakeholders if they:
- meet the criteria above and either:
 - refer to any joint activity the GLAA has participated in, or
 - refer to activity, reports or other content that is supportive of the organisation's strategic aim and priorities
- 19.5 The Chief Executive can also 'tweet' on behalf of the GLAA through their own personal account informing people about new developments, events attended and activities being undertaken as part of the role.
- 19.6 The day to day management and monitoring of GLAA social media accounts is performed by the communications and engagement team. The GLAA will engage in 'conversation' with members of the public through social media if the questions posed would be routinely answered if sent by email or asked by phone.
- 19.7 Any requests for information will be dealt with in accordance with the External Communications Policy, or under the provisions of the Freedom of Information Act when appropriate.
- 19.8 The GLAA 'tweets' job vacancies and encourages partner organisations to re-tweet the links to the jobs page on its website. This gains extra exposure and advertising for vacant roles at no cost.
- 19.9 Any confidential information supplied to the GLAA through the private messaging facility on Facebook and other social media platforms, will be forwarded on to the GLAA intelligence team and dealt with in line with existing data handling procedures.

20 Retention

- 20.1 The GLAA is committed to the secure and efficient management of its data, information assets and records for supporting the delivery of its services, documenting its principle activities and maintaining its corporate memory.

See also:

[GLAA Media Policy](#)
[GLAA Complaints Procedure](#)

- [1] [ICO Section 30 guide](#); and
[ICO Section 31 guide](#):
[2] [ICO guidance on - Neither confirm nor deny in relation to personal data](#)
[3] [ICO Section 43 guide](#)
[4] [ICO Section 40 guide](#)
[5] [Latest Charge Rate Guidance](#)