



Gangmasters  
Licensing Authority

# External Communications policy

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<i>Author: D Dixon</i>			<i>Director: D Dixon</i>	<i>Approver:</i>
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21/3/14	V7	DD	Reflect publication of FOIs	Revised draft
16/4/14	V8	DD	Reflect inclusion of text re engagement with media companies (Board action point)	
2/5/14	V9	PF	Rebranded to Home Office livery	
19/8/14	V10	PF	Reflect inclusion of social media usage	

## **1. Introduction**

1.1. This policy covers the GLA's position on release of information in the following situations

- 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 GLA'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 GLA 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 GLA 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 GLA 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 GLA 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 GLA 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 GLA appeal decision may be disclosed to the Insolvency Service. This can include access to any documents or copies of documents held by the GLA.
- 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 GLA 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 GLA officers
- 4.2 In certain circumstances, dependent on the information received by the GLA, 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. A copy of that document can be found [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 GLA 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 GLA 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 GLA 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.gsi.gov.uk](mailto:licensing@gla.gsi.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 GLA'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](#).

- 4.9 The GLA 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). But in any such consideration the GLA will take account of the public interest, and the need to correct any misunderstanding or misinformation.
- 4.10 The GLA 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 GLA. Requests from the media will be considered on a case by case basis and any media representatives accepted will be accompanied throughout by a GLA officer.
- 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 GLA 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 GLA 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 GLA visit to conduct the investigation.
- 5.2 GLA 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 GLA may issue a press statement. Such statements will be brief and confirm whether the GLA has undertaken an investigation and whether that has resulted in an arrest. It will not normally give any particulars that might identify the person arrested.
- 5.4 Where investigations and operations are carried out the GLA will not name labour providers or labour users.
- 5.5 The GLA will not normally name any labour provider or labour user who are faced with prosecution action. However, where parallel action leads to the refusals or revocation of a licence with immediate effect, the GLA will continue to consider the issue of a press release (see sections 6 and 7 below). In such circumstances the GLA's press release will name the organisation or individual in whose name the licence was held, but will not otherwise name any specific individual who may be subject of ongoing criminal action. The GLA recognises that in certain circumstances the name of the licence holder, whether a company name, or an individual, may be

the same as a person who may have been the subject of arrest, and result in press speculation and contact. Further release of information would follow the guidelines below regarding Freedom of Information requests (see section 11).

- 5.6 The exception to the position in paragraph 5.5 is where an individual has made their first appearance at court, and been named in any court hearing (including decisions that the individual may be bailed or held on remand), where there are no reporting restrictions. In that situation there may be press speculation, and the GLA may include the name of such individuals in its press release to avoid any misinformation.
- 5.7 At the conclusion of a prosecution the GLA will normally publicise the outcome. It may place a press release on its website. It may also proactively contact members of the press to alert them to it where the GLA considered 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 GLA will consider press releases, and contact with the press where appropriate (in line with paragraph 5.6), where a licence is refused.
- 6.2 If the applicant does not appeal the decision the GLA 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 GLA will not normally consider a press release until the outcome of the appeal. At the conclusion of the appeal, the GLA 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 GLA stakeholders, or set a precedent in the GLA's approach, on which the GLA needs to raise awareness.

## **7 Revocations**

- 7.1 Where the GLA revokes a licence "with immediate effect", a press release is usually issued immediately.
- 7.2 Where the GLA revokes without immediate effect and the labour provider can continue to trade, the GLA 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 GLA decision.
- 7.4 Where information is already in the public domain it is important for the GLA to clarify matters so that there is no misunderstanding or misinformation.
- 7.5 The GLA 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 GLA will continue to:

- issue press releases at the end of the appeals process (subject to the appellant losing), and
- add an entry to the GLA list of revoked licences (which also states if a business has successfully applied for a new licence).

7.7 The GLA 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 on the grounds that if a business shows willing to get themselves up to standard, it would be counterproductive to 'name and shame' them.

## **8 Information issued to the press on a refusal or revocation**

8.1 The following list sets out the information the GLA 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 Press releases regarding the outcome of criminal activity or revocations and refusals may be released to GLA Board members, and Supermarket and Supplier protocol signatories in advance of release into the public domain. In practice, where this occurs, it will not be normal practice to release them in excess of 24 hours prior to



release to the press and public. Such releases will be embargoed from further dissemination until the date of the public press release.

- 9.2 Where the GLA is to appear, or be referred to in any printed or broadcast article, concerning its activities, the GLA 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 GLA will aim to make Board members and Supermarket and Supplier signatories aware as soon as possible after broadcast or publication.
- 9.3 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 press 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 GLA'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 GLA 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 GLA'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 GLA 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 GLA 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 GLA to respond to such publicly available statements to ensure that there is no misinformation or incorrect information. It may do so in a press release or statement at the GLA Board, or both.
- 10.8 As a courtesy, the GLA may advise the other party of its intention to do so but it is the GLA's prerogative what such statements will say, where appropriate.
- 10.9 During the preparation for an appeal it may be necessary for the GLA 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 GLA 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 GLA 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 GLA will consider the issue of a press release. It will cover the issues set out in section 8 above.
- 11.2 The GLA will also publish the appeal decision on its website

## **12 Freedom of Information**

- 12.1 Where the GLA receives a request for information from the press, or other party, on the action the authority may be taking, which may include a request for an inspection report or licensing decision, the GLA 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 GLA 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 GLA 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<sup>1</sup>.

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See: Section 30 guide:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~media/documents/library/Freedom\\_of\\_Information/Detailed\\_specialist\\_guides/S30\\_EXEMPTION\\_FOR\\_INVESTIGATIONS\\_AND\\_PROCEEDINGS\\_V3.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/S30_EXEMPTION_FOR_INVESTIGATIONS_AND_PROCEEDINGS_V3.ashx); and

- 12.3 An 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 GLA will point to any general advice is pertinent to the request and advised where it can be found (for example on the GLA 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 GLA's intended response. Where appropriate the GLA will consider such submissions, but the final response is the GLA's decision alone. However, the GLA's response will not be delayed by such considerations where it can appropriately meet the required timescales to respond.
- 12.6 The GLA 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 GLA 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 GLA will not issue such courtesy letters. However, the information provided will be re-dacted 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 GLA 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 GLA compliance action, the GLA will consider release of the information to be exempt and rely upon "neither confirm nor deny" procedures<sup>2</sup>.

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Section 31 guide:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~media/documents/library/Freedom\\_of\\_Information/Detailed\\_specialist\\_guides/S31\\_EXEMPTION\\_FOR\\_LAW\\_ENFORCEMENT\\_V3.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/S31_EXEMPTION_FOR_LAW_ENFORCEMENT_V3.ashx)

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See ICO guidance:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~media/documents/library/Freedom\\_of\\_Information/Detailed\\_specialist\\_guides/when\\_to\\_refuse\\_to\\_confirm\\_or\\_deny\\_section\\_1\\_foia.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_specialist_guides/when_to_refuse_to_confirm_or_deny_section_1_foia.ashx)

- 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 GLA 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 GLA 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 GLA's website list of inspected companies, the GLA may rely on section 31(1) (g) until such time as a licensing decision is made. However, although the GLA 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 GLA 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<sup>3</sup>, 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 GLA has provided to another Government Department, where there may be ongoing compliance or criminal investigation by the GLA 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 GLA 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 inspections and operations details will not be published.
- 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 GLA will advise the person or company referred to in the FOIA before publication occurs. This approach to the subject of the FOIA is in addition to any previous approach in accordance with paragraph 12.5.

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Further information on s43 can be found at:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~media/documents/library/Freedom\\_of\\_Information/Detailed\\_special\\_ist\\_guides/COMMERCIALDETRIMENTOF3RDPARTIES.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_special_ist_guides/COMMERCIALDETRIMENTOF3RDPARTIES.ashx), and:

[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~media/documents/library/Freedom\\_of\\_Information/Detailed\\_special\\_ist\\_guides/AWARENESS\\_GUIDANCE\\_5\\_V3\\_07\\_03\\_08.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~media/documents/library/Freedom_of_Information/Detailed_special_ist_guides/AWARENESS_GUIDANCE_5_V3_07_03_08.ashx)

### **13 Data Protection requests**

- 13.1 A labour provider might make a request for information held by the GLA about themselves. Such requests are “subject access requests” in accordance with the Data Protection Act 1998, and will be dealt with under the requirements of that Act. Further information can be found on the Information Commissioner’s website<sup>4</sup>.

### **14 Advice and guidance**

- 14.1 The GLA will issue guidance to clarify its approach to determine compliance, and explain changes using the GLA Brief series, which can be found [here](#).
- 14.2 The advice and guidance available on the GLA 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 GLA will also work with industry to produce appropriate best practice guidelines in order to raise compliance levels (for example, the charge rates guidance<sup>5</sup>).

### **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 GLA 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.
- 16.2 A complaint may be made by writing to the GLA at [complaints@gla.gsi.gov.uk](mailto:complaints@gla.gsi.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 GLA will aim to respond within 15 days of receipt of the complaint by the complaint investigator. If the complaint cannot be

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[http://www.ico.gov.uk/for\\_organisations/guidance\\_index/~//media/documents/library/Data\\_Protection/Practical\\_application/checlist\\_for\\_handling\\_requests\\_for\\_personal\\_information.ashx](http://www.ico.gov.uk/for_organisations/guidance_index/~//media/documents/library/Data_Protection/Practical_application/checlist_for_handling_requests_for_personal_information.ashx)

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<http://gla.defra.gov.uk/PageFiles/961/Guidance%20on%20Indicative%20Minimum%20Charge%20Rates%20between%20Labour%20Providers%20and%20Labour%20Users%20-%201%20October%202012.pdf>

completed within 15 days the GLA will write to the complainant to indicate that the 15 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 GLA Chief Executive. The timescales highlighted in 15.3 above will also apply to the response provided by the Chief Executive.
- 16.5 The GLA 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 GLA recognises that interviews with third parties concerning a complaint may inadvertently create a release of information. The GLA 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 GLA 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 GLA 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 GLA recognises that the person interviewed may use such information which will then be beyond the control of the GLA.

## **17 Research**

- 17.1 The GLA 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 GLA 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 GLA is regularly approached by TV production companies seeking permission to document its activities, particularly operations that involve forced entry and arrests.
- 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 GLA they will include.
- 18.3 The GLA 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 GLA 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 GLA.
- 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 GLA if vulnerable and exploited people are placed in a position of risk.
- 18.7 See also paragraphs 4.10 -4.12 regarding visits to premises accompanied by media representatives.

## **19 Use of Social Media**

- 19.1 The GLA has a presence on both Facebook and Twitter and its use on these platforms should comply not only with this policy but also with the [general guidance on social media usage](#) from the Cabinet Office.
- 19.2 Adhering to the Civil Service guidance document (linked above), the GLA will employ social media if the information being released:
- complies with other provisions within this External Communications Policy document
  - 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 GLA's social media platforms are set so that any information or statement sent out through Twitter is reproduced automatically on Facebook.
- 19.4 Currently, the organisation tweets 'short links' to news releases – which in turn appear on the Facebook page - to gain additional exposure at no cost.
- 19.5 The GLA will also 're-Tweet' messages from partner organisations and/or stakeholders if they:
- meet the criteria above and either:
  - refer to any joint activity the GLA has participated in, or

- refer to activity, reports or other content that is supportive of the organisation's strategic aim and priorities

- 19.6 There is also scope for the Chief Executive to establish an account and 'tweet' on behalf of the GLA, informing people about events attended and activities being undertaken as part of the role.
- 19.7 An email is sent to the Communications Officer if any interaction occurs on Facebook. The GLA 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.
- 19.8 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.
- 19.9 The GLA '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.
- 19.10 Any confidential information supplied to the GLA through the private inbox facility on Facebook will be forwarded on to the intelligence team and deal with in line with existing data handling procedures.