

Practical Guide on the Audio Recording of Personal Interviews



REC

Practical Guide on the Audio Recording of Personal Interviews

October 2025

On 19 January 2022, the European Asylum Support Office (EASO) became the European Union Agency for Asylum (EUAA). All references to EASO, EASO products and bodies should be understood as references to the EUAA.



Manuscript completed in October 2025

Neither the European Union Agency for Asylum (EUAA) nor any person acting on behalf of the EUAA is responsible for the use that might be made of the following information.

Luxembourg: Publications Office of the European Union, 2025

Print ISBN 978-92-9418-088-9 doi: 10.2847/1846242 BZ-01-25-056-EN-C

PDF ISBN 978-92-9418-087-2 doi: 10.2847/1004043 BZ-01-25-056-EN-N

© European Union Agency for Asylum (EUAA), 2025

Reproduction is authorised provided the source is acknowledged.

For any use or reproduction of elements that are not owned by the EUAA, permission may need to be sought directly from the respective rightholders. The EUAA does not own the copyright in relation to the following elements:

— Cover illustration: ninefotostudio, © Adobe Stock

About the guide

Why was this guide created? The mission of the European Union Agency for Asylum (EUAA) is to facilitate and support the activities of EU Member States and the Schengen associated countries ⁽¹⁾ in the implementation of the Common European Asylum System. In accordance with its overall aim of promoting the correct and effective implementation of the Common European Asylum System and of enabling convergence, the EUAA develops common operational standards and indicators, guidelines and practical tools.

How was this guide developed? This guide was created by experts from across the EU, with valuable input from the European Commission and the United Nations High Commissioner for Refugees ⁽²⁾. The development was facilitated and coordinated by the EUAA. Before its finalisation, a consultation on the guide was carried out with all EU Member States and the Schengen associated countries through the EUAA Asylum Processes Network. The EUAA would like to extend its thanks to the members of the working group who contributed to the development of this guide: Martina Berger, Alessandra Frusciante, Claudia Möser and Lisa Sheils.

Who should use this guide? This guide is primarily intended for asylum administrations in charge of personal interviews, including policymakers in the national determining authorities. The guide can also be useful for case officers and file managers. Additionally, this guide is useful for quality officers and legal advisers, as well as any other person working or involved in the field of international protection in the EU context.

How does this guide relate to national legislation and practice? This is a soft convergence tool. It is not legally binding and reflects commonly agreed standards as adopted by the EUAA Management Board in October 2025.

How does this guide relate to other EUAA tools? This guide should be used in conjunction with other available practical guides and tools. All EUAA practical tools are publicly available online on the EUAA website: <https://euaa.europa.eu/practical-tools-and-guides>.

Disclaimer

This guide was prepared without prejudice to the principle that only the Court of Justice of the European Union can give an authoritative interpretation of EU law.

⁽¹⁾ The 27 EU Member States and Iceland, Liechtenstein, Norway and Switzerland.

⁽²⁾ Note that the finalised guide does not necessarily reflect the positions of the United Nations High Commissioner for Refugees.



Contents

List of abbreviations.....	5
Introduction.....	6
1. The audio-recording of personal interviews	7
1.1. Types of interviews to be audio recorded	8
1.2. Information provision on the audio recording	9
1.2.1. Information to provide to the applicant	9
1.2.2. Information to provide to the other interview participants	12
1.3. The quality of the audio recording	12
1.4. The process of audio recording	14
1.5. The technical setup for audio recording.....	18
1.6. Audio recording of remote personal interviews	23
2. The governance and management of the audio file	25
2.1. Data protection impact assessment.....	25
2.2. Managing the audio file	26
3. The transcript of the audio recording	30
3.1. The content of the transcript of the recording	31
3.2. The modalities of transcription	33
3.3. Safeguards for applicants and correctness of the transcript of the recording.....	33
4. Building capacity	36
4.1. Building system capacity	36
4.2. Building user capacity	36
4.2.1. Written guidance documents	37
4.2.2. Training sessions	38
4.2.3. Focal point systems.....	38





List of abbreviations

Abbreviation	Definition
AMMR	asylum and migration management regulation — Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013
APR	asylum procedures regulation — Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 establishing a common procedure for international protection in the Union and repealing Directive 2013/32/EU
DPIA(s)	data protection impact assessment(s)
EUAA	European Union Agency for Asylum
EU	European Union
GDPR	general data protection regulation
Member States	EU Member States





Introduction

The asylum procedure regulation (APR) ⁽³⁾ and the asylum and migration management regulation (AMMR) ⁽⁴⁾ provide that personal interviews must be audio recorded. These include admissibility and substantive interviews as well as personal interviews carried out to determine the Member State responsible for examining the application.

The audio recording of personal interviews contributes to ensuring the efficiency, fairness and transparency of the asylum procedure.

National administrations need to have appropriate processes and technical systems in place to operationalise the audio recording of personal interviews and to ensure the correct governance and management of the audio files. Applicants need to be adequately informed about the audio recording and its purpose. Any need for special procedural guarantees should also be considered.

This practical guide is addressed to national administrations responsible for personal interviews. It aims to provide guidance on how to set up and manage the audio recording of interviews. It includes practical guidance as well as examples of good practices from Member States and useful tips.

Chapter [1](#) first clarifies which interviews must be audio recorded. It also highlights what information in respect of the audio recording should be provided to the applicant and other participants present at the interview. It defines the key aspects that ensure the quality of the audio recording. It provides guidance on the aspects of the process that need to be clearly defined and regulated, as well as on the technical aspects to consider when setting up the audio recording system. Finally, it contains reflections on specificities of audio recording of interviews by videoconference (remote interviews).

Chapter [2](#) provides guidance on aspects to consider and measures to adopt to ensure the proper governance and management of the audio file.

Chapter [3](#) addresses the written record of the personal interviews, with a focus on the transcript of the audio recording.

Chapter [4](#) includes considerations on how to ensure that the system and the users build and maintain the necessary capacity to provide a smooth audio recording process and correct management of the audio file.

⁽³⁾ Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 establishing a common procedure for international protection in the Union and repealing Directive 2013/32/EU (OJ L, 2024/1348, 22.5.2024), <https://eur-lex.europa.eu/eli/reg/2024/1348>.

⁽⁴⁾ Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013 (OJ L, 2024/1351, 22.5.2024), <https://eur-lex.europa.eu/eli/reg/2024/1351>.





1. The audio-recording of personal interviews

As laid out in Article 14(2) APR and Article 22(7) AMMR, the **audio recording** of personal interviews is a **mandatory requirement** for national administrations. All personal interviews must be recorded by means of audio recording. There is no possibility for the applicant to opt out.

The audio recording contributes to strengthening the **efficiency, fairness** and **transparency** of the asylum procedure and particularly to safeguarding the procedural integrity of the asylum examination.

The audio recording provides an **objective record** of what was said in the way it was said. The audio recording reflects how messages are passed on (the tone, the register) and records non-verbal sounds (such as crying, laughing), filler sounds (e.g. ‘ehm’, ‘uh’, etc.) as well as silences. It complements the written record of the interview by providing an exact reproduction of the interview.

The audio recording acts as a **safeguard** against potential omissions, errors or inconsistencies in the record of the interview allowing for a sound and fair examination and decision-making process. It ensures that in case of doubt as to the actual statements given, the questions asked or their translation, there is an objective and reliable record available that can be easily consulted. The audio files can also be used by the second instance examination authorities, where the decision is subject to review or appeal. It also helps to ensure that the interview is conducted in a fair and unbiased manner ⁽⁵⁾.

To achieve the objectives of strengthening the efficiency, fairness and transparency of the asylum procedure, it is vital to ensure the **quality** of the audio recording produced. For more information, see Sections [1.3 The quality of the audio recording](#), [1.4 The process of audio recording](#) and [1.5 The technical setup for audio recording](#).

When implementing the audio recording of the interview, authorities must pay attention to the requirements of applicants in need of **special procedural guarantees** ⁽⁶⁾.

Confidentiality and **data protection** principles and rules need to be put into practice by the national authorities in view of safeguarding the asylum procedure but also to ensure compliance with other EU legal obligations. See Chapter [2. The governance and management of the audio file](#).

The audio recording of the personal interview must be **regulated** by national administrations in all its key aspects and in a manner that is compatible with other related **processes** (e.g. the

⁽⁵⁾ National administrations could also make use of the audio recordings in their quality assurance mechanisms. On quality assurance, see EUAA, *Practical Guide on Quality Assurance in Asylum Procedures*, May 2024, <https://euaa.europa.eu/publications/practical-guide-quality-assurance-asylum-procedures>.

⁽⁶⁾ Article 14(2) APR.



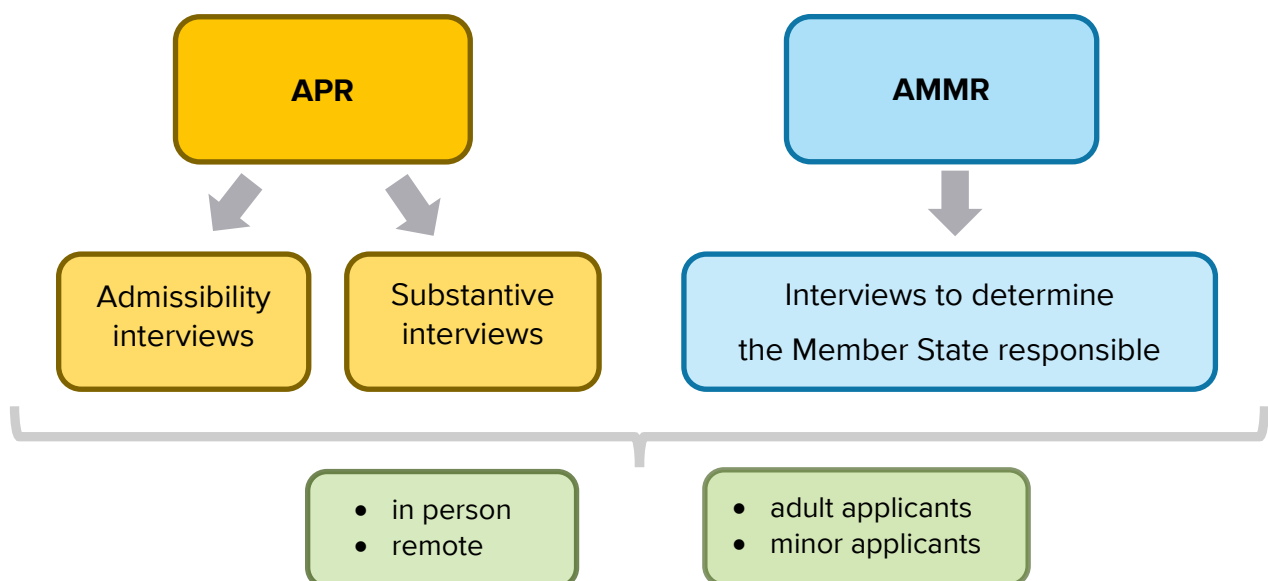
conduct of the personal interview, the case management system, etc.). See Section [1.4 The process of audio recording](#) and Chapter [2. The governance and management of the audio file](#).

1.1. Types of interviews to be audio recorded

In accordance with the **APR**, the **personal interview** must be recorded by audio means of recording ⁽⁷⁾. The obligation to audio record applies to all interviews defined as ‘personal interviews’. They include therefore both interviews on the admissibility (**‘admissibility interview’**) and on the merits (**‘substantive interview’**) of the application for international protection. They include personal interviews conducted under the asylum border procedure, accelerated examination procedure as well as the regular procedure. Other types of interviews, for example registration and screening interviews, do not fall under the obligation to audio record.

In accordance with the **AMMR**, the authorities must make an audio recording of the personal interview that is carried out to **determine the Member State responsible** ⁽⁸⁾. Other interviews, for example security interviews for relocation ⁽⁹⁾, do not fall under the obligation to audio record.

Figure 1. Types of interviews to be audio recorded



There is **no exception** in the legislation to the mandatory audio recording of personal interviews. The obligation to audio record is for both **in-person** and **remote** interviews. It concerns interviews with adult applicants as well as with minors.

⁽⁷⁾ Article 14(2) APR.

⁽⁸⁾ Article 22(7) AMMR.

⁽⁹⁾ Article 67(8) AMMR.



If the recording cannot be performed, the interview should not take place or proceed. Ensuring a reliable technical setup and having back-up and support systems in place is therefore very important (on this, see Section [1.5 The technical setup for audio recording](#)).

The audio recording is conceived as a guarantee for the applicant, who cannot opt out from the recording.

The applicant needs to receive key information on the recording before the beginning of the interview and their need for special procedural guarantees must be considered (see below, Section [1.2.1 Information to provide to the applicant](#)).

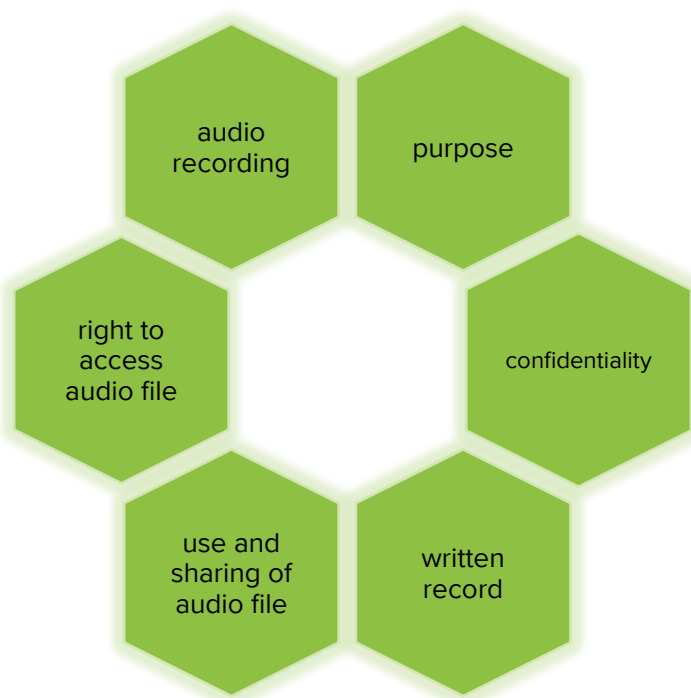
1.2. Information provision on the audio recording

Both the applicant and other participants present at the interview (such as legal guardians, legal representatives, etc.) must be informed about the audio recording of the interview.

1.2.1. Information to provide to the applicant

Both the **APR** and the **AMMR** require that administrations ensure that the **applicant is informed** in advance that an **audio recording** of the interview will take place and of the purpose of such recording.

Figure 2. Information provision on audio recording



Before the beginning of the interview, the applicant must be informed of the following:

- that the **interview will be audio recorded** and that **audio recording is mandatory**;
- the **purpose** of the recording, including that:
 - the recording is done to ensure an accurate record of the interview;
 - it can be used by the authorities responsible for the examination of the application to verify the statements made by them, particularly in case of doubt;
 - it can be admitted as proof during the appeal if the national law provides for this;
- the **confidentiality** of the recording and what it entails, including that no information is shared with the country of origin;
- that a **written record** (or a summary, in the case of the AMMR) of the interview will be produced and of the format of the written record;
- their right to have access to the written record as soon as possible after the interview and, in any case, before the decision on their application is made and, if applicable, their right to make comments and provide clarifications on its content ⁽¹⁰⁾;
- (for personal interviews carried out in the framework of the APR) when and how the applicant and their representative will have **right to access** the recording.

Clear information about the purpose of the audio recording, how the audio recording will be used and with whom it can be shared will be necessary to ensure the applicant is informed about the protection of their personal data. Informing the applicant of how the recording will be shared further contributes to the transparency. (See Chapter [2. The governance and management of the audio file](#)). This information should appear in data protection notices or privacy statements ⁽¹¹⁾. This will also contribute to informing and ultimately reassuring the applicant of the confidentiality of the interview.

It might be useful to inform the applicant of the device(s) used for the audio recording. It is advisable to inform that the entire interview will be recorded, from the start to the end. Asking the applicant at the beginning of the interview to speak at an audible tone will help to ensure the quality of the recording.

It is important that the information above, as with all information provided to applicants for international protection, is delivered in a **clear**, easily understandable and accessible manner.

Depending on the specific needs of the applicant, measures may need to be put in place ‘in order to create the conditions necessary for the genuine and effective access to procedures’ ⁽¹²⁾. These **special procedural guarantees** can include adapting the information provision messages and modalities.

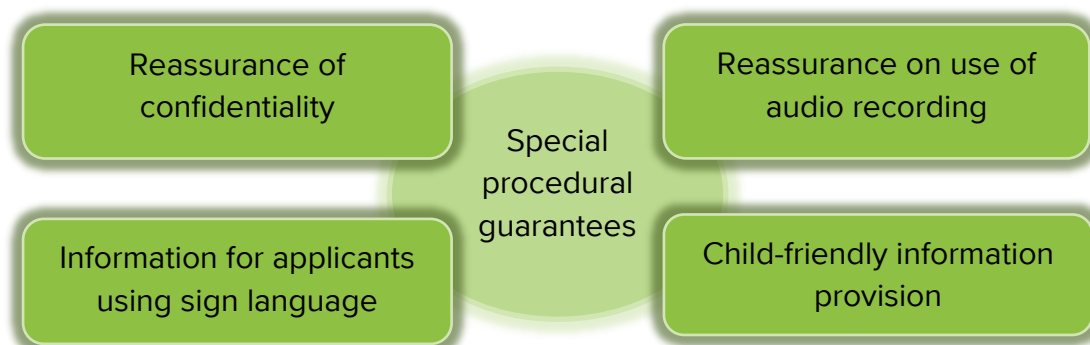
⁽¹⁰⁾ Article 8, Articles 14(1), (3), (4), (6) APR and Article 22(7) AMMR.

⁽¹¹⁾ The data protection notice or statement should also include the information described in Articles 13(1) and (2) of the GDPR. This information can be included in data protection notice or privacy statement on the personal interview, with no need for a separate statement covering only the audio recording.

⁽¹²⁾ Recital 20 and Article 14(2) APR.



Figure 3. Special procedural guarantees



In the context of the audio recording, some applicants may need reassurances of the confidentiality of the recording and its use. For example, additional **reassurances on the confidentiality and the use of the recording** might be needed for applicants who are hesitant to share their claim due to its intimate nature. For example, this might concern claims relating to forms of gender-based violence or to sexual orientations, gender identities, gender expressions and sex characteristics or otherwise applicants who might be afraid that the information would reach their national authorities (e.g. applicants holding political opinions) or who share sensitive information (e.g. about their smugglers or traffickers). Clarifications and reassurances on the technical modalities of the recording might be needed for applicants concerned by the use of the equipment.

Applicants in need of **sign language** translation need to be informed that the audio recording will record what the interpreter translates into the language of the administration. In these cases, special emphasis can be put on the importance for the applicant to verify the written record of the interview and raise any concern regarding its correctness. (See also [Section 3.3. Safeguards for applicants and correctness of the transcript.](#))

For children, the information provision about the recording must be conducted in a **child-friendly** and context-appropriate manner, taking into consideration the age and maturity of the child. Where the child is unaccompanied, the information must also be addressed to the child's appointed representative ⁽¹³⁾.

If the applicant expresses concerns about being recorded, they should be given the key information again regarding the recording and its purpose. They should be further reassured about the guarantees in place, including confidentiality.

The applicant should be informed that the audio recording is a requirement of the procedure that constitutes a safeguard and that it is not possible for them to opt out from it. If the applicant refuses to take part in the interview or they do not answer some questions, they should be informed of the possible consequences of such refusal. In particular, these might be grounds for implicit withdrawal if there is no justified cause and if the outcome of the interview was not sufficient to make a decision on the merits of the application.

⁽¹³⁾ Article 23 APR.





Good practices

The key information on the audio recording can be provided:

- when the invitation to the personal interview is shared;
- on the webpage of the asylum authority or other relevant webpages;
- in general information provision materials or sessions on the asylum procedure provided at any stage before the personal interview;
- in dedicated information provision materials or sessions provided at any stage before the beginning of the personal interview.

Information material can include, for example, leaflets, videos, posters, etc.



Related EUAA publication

For more details on information provision to the applicant on the personal interview, see the EUAA, *Practical Guide on Information Provision in the Asylum Procedure*, December 2024, Section 3.2.5. Personal interview, <https://euaa.europa.eu/publications/practical-guide-information-provision-asylum-procedure>.

1.2.2. Information to provide to the other interview participants

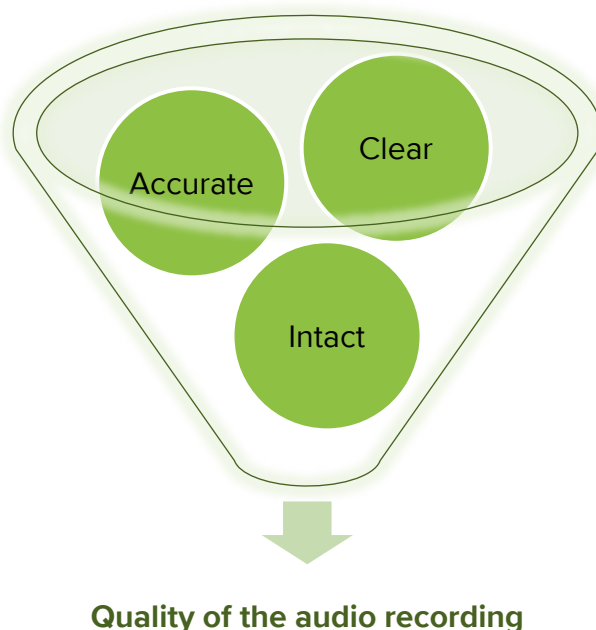
Authorities need to inform interpreters, legal representatives and other participants present at the interview (e.g. support persons) about the audio recording of the personal interview. Participants need to be informed of the purpose of the audio recording as well as the confidentiality and safeguards that are put in place to protect the data of all present. Information on the use that will or can be made of the recording will be necessary to the extent that data protection considerations are involved. This information should appear in a data protection notice or privacy statement to be communicated to all interview participants. This notice may be a different data protection notice to the one addressed to the applicant.

1.3. The quality of the audio recording

The audio recording must be of such quality to allow both the determining authorities and the applicants to have a record that captures the exact details of what was communicated during the interview by each of the interlocutors.



Figure 4. The quality elements of the audio recording



To meet its purpose of keeping an objective and reliable record of the interview, the audio recording needs to be:

- **accurate**, providing a precise record of the entire interview with no omissions ⁽¹⁴⁾, including all the applicant's declarations, the interviewer's questions and statements, the interpreter's translation and the statements made by any other person participating in the interview as well as any non-verbal sounds made by the participants present at the interview (e.g. crying, filler sounds, etc.) and silences;
- **clear**, allowing for the relevant voices to be distinctly heard;
- **intact**, ensuring that no alterations are made or losses occur.

Ensuring the quality of the recordings contributes not only to the effective documentation of the interview but also to the overall fairness, transparency and accountability of the asylum procedure. It does so by guaranteeing that the statements, non-verbal sounds and silences of all participants present at the interview are accurately recorded and can be appropriately considered throughout the process.

Consequently, it is important that Member States take steps to ensure that both the process for audio recording, the technical setup and the management of the audio file are **fit for purpose** and effective, allowing for a record of every personal interview meeting the quality criteria. These aspects are discussed in Sections [1.4 The process of audio recording](#) and [1.5 The technical setup for audio recording](#) as well as Chapter [2. The governance and management of the audio file](#).

⁽¹⁴⁾ To ensure this, it is important that if written documents are discussed throughout the interview, the relevant sections of the document being discussed are read out loud. This avoids, for example, an interviewer simply pointing at a document and asking vaguely: 'Who is the person mentioned here in this document?' Instead, the interviewer could ask 'Who is the person named 'XY' mentioned in the summon letter you submitted?'



1.4. The process of audio recording

National authorities should have a **defined process** in place for the audio recording of personal interviews, with a clear workflow and responsible actors in order to ensure effective and consistent implementation. The process needs to **integrate** the personal interview and file management processes, which might need to be adapted accordingly.

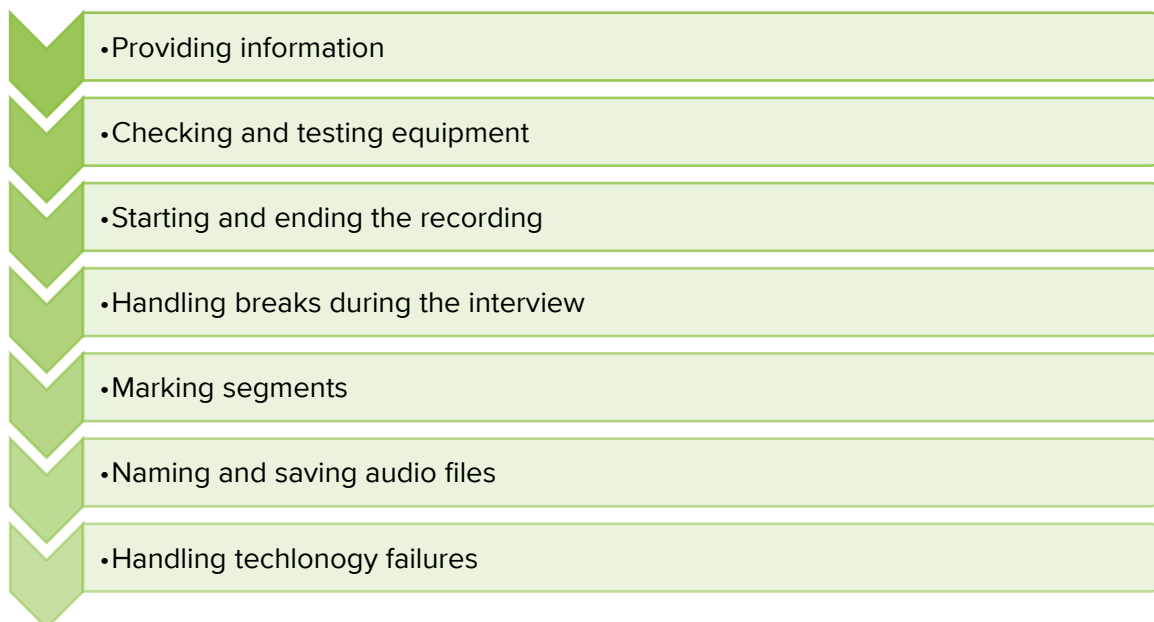
The **quality** aspects and **safeguards** mentioned in previous sections will need to be considered when setting up or defining the audio recording process.

Clear **guidance documents**, such as protocols, guidelines or standard operating procedures, should therefore be in place. Relevant staff, including all officers conducting personal interviews, case file managers, process managers, etc. need to be familiar with guidance relevant to their functions (see also Chapter [4. Building capacity](#)). The guidance can be included in already existing guidance documents or in dedicated guidance.

The **management of the audio file** also needs to be regulated and guidance be in place at national level. On this, see Section [2.2 Managing the audio file](#)

Administrations should ensure that the **key elements of the process** mentioned in the list below are regulated and effectively performed.

Figure 5. The process of audio recording – key elements



(a) Providing information

Information provision to applicants regarding the audio recording is an essential step of the process. Administrations must define clear responsibilities and modalities for such information to be provided. (See Section [1.2 Information provision on the audio recording](#) for more



guidance on the timing and content of the information provision, possible modalities and materials as well as considerations on relevant special procedural guarantees).

(b) Checking and testing the equipment

Systematic and regular testing and updates of the functioning of both hardware and software (e.g. recording devices, microphones, etc.) are necessary to ensure that they remain reliable and efficient. This task will normally be assigned to the technical (ICT) department.

It is also advisable to ensure that **pre-interview equipment checks and testing** are performed to identify malfunctions, verify appropriate recording volume levels to ensure optimal sound capturing and recording and prevent distortions.

The equipment to be checked and tested includes, at a minimum, the audio recording device or application, microphone(s) and computer/laptops. These tasks can be assigned either to technicians or to the officers conducting the interview. (See also Section [1.5\(j\) IT support and backup system](#)).



Good practice

In addition to pre-interview tests, it is a good practice to set up also **regular automatic checks** by the system (e.g. carried out every night) to check the microphones to ensure they are all connected and working. Automatic (daily) checks can also verify the technical quality of the audio files produced to ensure none are corrupted and flag possible issues.

Monitoring sound levels during the interview session also helps to avoid distortions.

(c) Starting and ending the recording

The process must ensure that the recording starts the moment the interview begins and that it includes the opening of the interview.



Good practice

To minimise the risk that the officer conducting the interview forgets to start the recording, a **prompt or reminder** can be inserted in the interview transcript template or as a pop-up window.

The recording needs to be stopped once the interview is concluded.

It is advisable that the interviewer verbally states that the interview is starting and specifies the time. In a similar vein, it is advisable that the interviewer verbally states when the interview is ending and specifies the time the interview ends.



Starting and stopping the recording can be a task assigned to the interviewer or case officer or to any other dedicated staff.

(d) Handling breaks during the interview

When a break is taken during the interview, **pausing** rather than stopping the recording is recommended to avoid having multiple audio files. This requires that the interviewer or dedicated staff remember to restart the recording as soon as the interview resumes.

It is also an option to **keep** the recording going during breaks from the interview. In this case, however, there is the need to make sure that nothing is being said around the recording device or applications, to avoid that statements made outside the interview context appear in the audio recording.

In both cases, it is advisable that the interviewer **verbally states** that a break is being taken and specifies the time the break starts as well as the time when the interview resumes. This ensures that both the fact that a break is taken and its context are captured in the recording (and its transcription), maintaining a complete account of the interview.



Good practice

Some programs are designed with specific features to mitigate human error such as pop-ups or other kinds of **warnings or notifications** to the user if something is amiss, for example if the recording is not running or has stopped. Warning pop-up messages or icons that the recording needs to be restarted after a break are helpful in minimising the risk that the interviewer forgets.

(e) Marking segments of the audio and transcript

To facilitate later processing, it is useful that the decision-maker(s) can easily **identify the segment of the audio** recording relating to given statements or a given portion of the interview. This can be important, in particular, where there are doubts as to the statements of the applicant or where the applicant provided comments on the written record of the interview. It can also be useful in appeal proceedings.

For this purpose, the authorities can include in the process that **time markers** be added to the audio recording during the interview as well as **text markers** added to the written record of the interview, at the moments in the personal interview where significant points or themes are discussed. These markers are notes by which a given moment or portion of the interview can be flagged and labelled. For example, by inserting a time marker in the audio file, the case officer could flag the portion of the interview when the fear of return is being discussed.

If the device(s) or application(s) in use allow for the addition of markers to the audio recording and/or the transcript, this would be the task of the interviewer (or the staff managing the audio recording or transcript, if different to the interviewer). Some device(s) and application(s) also allow for automatic time/text marking at given intervals.



Alternatively, time-markers can be added manually to the transcript. Otherwise, a separate log or note file can be kept with a note of the timestamps and corresponding keywords or phrases. These can be done in parallel with the recording and ensures that the markers are accurate.

(f) Naming and saving the audio file

It is essential that audio files pertaining to a given interview are easily identifiable and retrievable. The naming convention should be clear, structured and known by the relevant personnel.

Some applications allow for automatic naming of the file. Otherwise, manual naming can be implemented or a combination of both.



Good practice

The **naming convention** could include the case file identifier, the case officer identifier, and/or interpreter's identifier, the date of the interview, the type of interview, etc.

Timely saving of the audio file is also essential. The system can provide for either automatic saving or manual saving. Automatic saving reduces the risk of human error and possible consequent loss of the audio file.

The process in place should also define the **(electronic) location** where the audio file should be saved and stored. The audio file must be included in the applicant's file.

Particular attention must be paid by the authorities to ensure that when the personal interview is conducted **off-site** (e.g. in detention facilities, hospitals, etc.) the safety of the audio file produced is not compromised. Saving and storing should be ensured in accordance with data protection and the file management system (for more information, see Chapter [2. The governance and management of the audio file](#)).

Ensuring the timely and correct naming and saving of the audio file can be assigned to either the interviewer or the case officer or to any other dedicated staff member tasked with doing this.

(g) Handling technology failures

Technological failures of the equipment (recording device or application, microphone, laptop, etc.) may hinder the quality of the audio recording and can cause frustration for everyone present. It is therefore important to have a **clear plan** to guide the interviewer/case officer to address these issues when they arise. The process should define what to do if the equipment for the audio recording does not function properly or stops functioning. It should also provide guidance on how to act if problems arise with the naming and saving of the file.

Defined protocols should also be in place to define what to do if the audio file is **corrupted** (i.e. it is not fully readable or accessible), **missing** (i.e. it was never produced due to a system



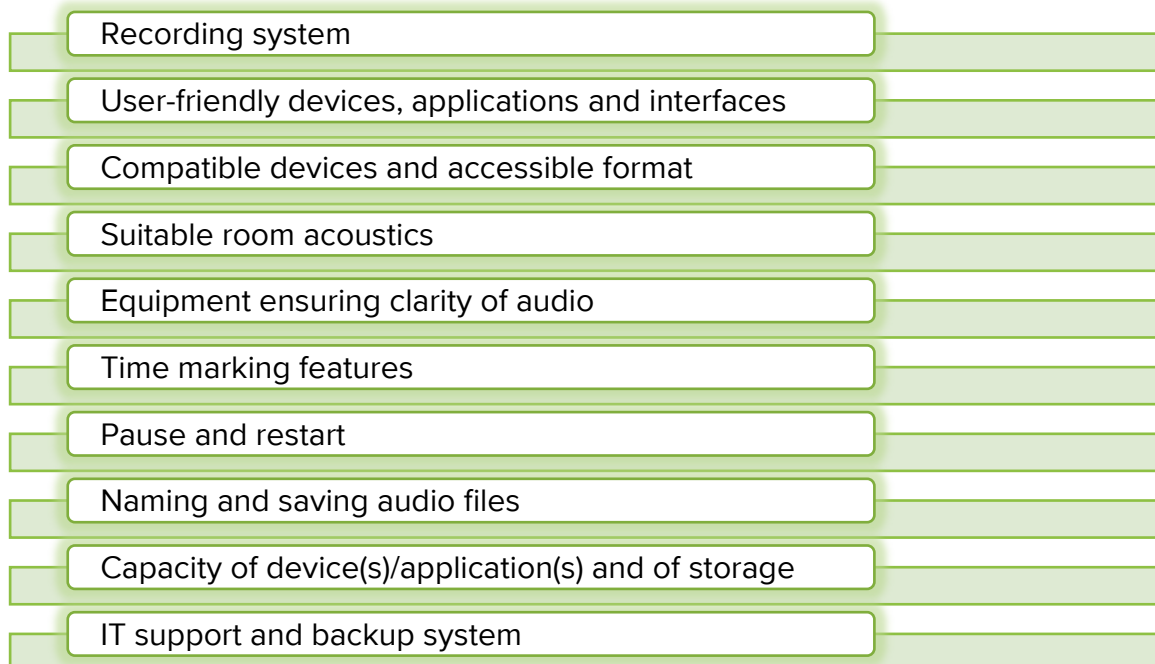
malfunction that was not timely noticed) or **lost** (i.e. it was correctly produced but subsequently cannot be found). In these cases, if the applicant had the opportunity to comment and provide clarifications on the written record of the interview and has confirmed its content, and if there is no outstanding doubt as to the content of the interview, the administration can consider that, exceptionally, the written record of the interview will be the sole format in which the interview record is included in the file. If, on the other hand, the applicant has not had the opportunity to clarify and confirm the written record of the interview, the absence of the audio recording would leave the procedure without sufficient safeguards and the interview should be repeated. On the written record of the interview and relevant guidance, see Chapter [3 The transcript of the audio recording](#).

1.5. The technical setup for audio recording

The **technological setup** for audio recording must ensure the quality of the audio file and compliance with the audio recording process and legal standards. Both hardware and software can play critical roles in achieving a recording that is fit for purpose and allowing the correct implementation of the process.

While technology and resources may vary across Member States, the **technical considerations** below are intended to advise the determining authorities on how to ensure that audio recordings are fit for purpose. These considerations help to protect the interests of all parties involved, contributing to a fair, transparent and reliable asylum process.

Figure 6. Technical setup for audio recording – key considerations





(a) Recording system

The recording systems used can be either **external** recording devices (separate to the computer/laptop) or recording devices and applications **integrated** into the computer/laptop, or a combination of both. Integrated systems may rely on microphones built into the laptop/computer or on external microphones connected to them.

(b) User-friendly devices, applications and interfaces

The device(s) and application(s) should be **user-friendly** to facilitate correct usage and minimise the risk of human errors.

Devices and applications should be easy to use, with clear commands for the necessary functionalities (e.g. start, pause, stop the recording, adjust the volume, etc.).



Good practice

Integrating the interface/program of the recording application into the interface/program used by the interviewer to type the written record of the interview can be helpful for the case officer. It reduces the risks of forgetting to take the necessary actions relating to the audio recording. It also avoids needing to juggle multiple applications at the same time.

(c) Compatible devices and accessible format

The device(s) and application(s) should be **compatible** with existing equipment to minimise operational challenges and costs. If this is not the case, the necessary amendments or updates of the technology need to be planned and carried out.

Different recording systems generate audio files in different formats. They can either generate widely accessible formats or specialised formats readable by the specific (and often paid) software, or both. Choosing a system that produces audio files in a **format** that is generally **accessible** without the use of specialised software, even if it does not exclusively produce files in this format, ensures the accessibility needed by the authorised parties, particularly in the appeal procedure. The file format should also be **compatible** with the case management system.



Useful tips

- The bit rate should not be too low as this will affect the intelligibility of the audio recording.
- If a system that uses a specialised format is chosen, the implications on storage capacity need to be considered too, as the size of such files may be larger than the most common formats.

See also Section [1.5\(i\) The capacity of the device\(s\)/application\(s\) and storage capacity](#).



In cases where interviews are conducted off-site, i.e. **outside the premises** of the national authority (e.g. interviews in detention centres, hospitals, etc.), the devices and systems chosen for those occasions must be compatible with the audio recording system and ensure quality requirements.

(d) Suitable room acoustics

Room acoustics and size play a critical role in the overall sound quality of the recording and should be taken into consideration.

The room should be **quiet**, with minimal background noise or external distractions.



Useful tips

- Measures can be taken that reduce the impact of outside noise such as traffic or people, for example the interview rooms are located in a quiet part of a building, the rooms are soundproof and the windows and doors are kept closed. It is beneficial to also reduce indoor noises, such as noise from fans, air conditioning units, etc.
- A room that is too small may result in excessive reverberation, while a room that is too large could complicate sound isolation. Ideally, the room is of a size that prevents echoes and allows easier control of the acoustics. Simple soundproofing measures, such as using soft materials (e.g. curtains or carpets) can help mitigate unwanted sound reverberations.

(e) Equipment ensuring clarity of the audio

Essential conditions include devices and microphones capable of recording clear sound and of being appropriately placed in the room.

Both integrated and external **microphones** can be used. External microphones are often preferred for their superior sound clarity and reliability. Table/conference microphones are considered particularly effective in recording voices clearly. They are well-suited to capturing a consistent sound from a fixed position. They can also be suitably placed around the room, for example away from the keyboard, at equal distance between the participants to the interview, etc. If multiple microphones are used, the recording device or software must allow for multitrack recording.

Noise cancellation features in software, devices, applications or microphones may help reducing the risk of recording unwanted background noise. However, the use of noise cancellation may run the risk of not recording non-verbal sounds made and filler words pronounced by participants in the interview, which should appear in the audio recording.



Good practices

- Silent keyboards help to reduce the disturbances in the audio.
- Placing a desk mat or foam pad under the keyboard may also help reducing typing noise.
- Limiting the frequencies that are captured by the microphone could help reducing disturbances from being recorded. At the same time, it helps keep the size of the audio file manageable.

(f) Time marking features

Recording devices and applications would ideally include features such as **time markers** to facilitate the identification of specific segments of the interview.

Using software with built-in features for **automatic time stamping at regular intervals** or for segmenting the audio ensures consistent and precise markers. In addition, it would be useful if the device(s) or application(s) also allow for the possibility to manually add markers so that the interviewer can flag particularly relevant points of the interview for future reference.

Opting for software or applications that allow for a search functionality within the audio is also a possibility (in this case, compliance with data protection and artificial intelligence-related regulations is needed).



Useful tips

Some advanced automated transcription systems offer synchronisation between the audio and the text transcription (transcript of the audio). With this functionality, clicking on a specific word in the transcription automatically plays the audio from the point where the word was spoken. This feature significantly enhances efficiency in locating and reviewing key parts of the interview. On automated transcription, see Box [Automated transcription](#).

(g) Pause and restart

It would be beneficial if the recording systems include options to **pause** and restart the recording. This is needed to ensure continuity of the recording even when breaks from the interview are taken.

(h) Naming and saving of the audio file

Timely saving of the audio file is essential. **Automatic naming and saving** features can help to avoid loss of recordings. Manual saving features are also an option if there is consistency in how they are applied. **(Automatic) periodic saving** during the interview reduces the risk of losing data due to sudden equipment failures.

Many modern recording systems offer automatic saving features that ensure data is saved continuously during the interview, without manual intervention. These systems save the file automatically at set intervals, reducing the risk of losing data if something goes wrong. Other programs allow for automatic saving as soon as the recording is stopped.

As with saving the audio file, the naming of the file is also important. Putting a system in place for the **automatic naming** of the audio file can reduce the risk of error.



Good practices

If automatic naming and saving are an option, the system can be programmed to generate the name including key information such as the case file identifier, the case officer and/or interpreter's identifier, the date of the interview, etc.

(i) The capacity of the device(s)/application(s) and storage capacity

The recording device(s) and application(s) should have **sufficient capacity** to record and (at least) temporarily store entire interviews without interruptions.

The audio file produced should be of a **size** that is in line with the system functionalities and storage capacity. Different audio file formats may produce files of different average size. On storage, see Section [2.2\(b\) Storage and erasure of the audio file](#).

The technical solutions chosen to audio record interviews conducted **off-site** (e.g. in detention facilities, hospitals, etc.) must ensure that the safety of the audio file is not compromised. They must also ensure saving and storage in accordance with data protection and file management system (for more information, see Chapter [2. The governance and management of the audio file](#)).

(j) IT support and backup system

As mentioned, **technological failures** may negatively affect the quality of the audio recording. IT support and backup systems to troubleshoot such problems are therefore essential.

These include **standby IT and other technical support (e.g. a helpdesk)** to help resolve any problems with or malfunctioning of the recording equipment, software or applications.

In the event of a technological failure, having **backup systems** in place, whether another recording device or a backup system for saving the file, helps ensure continuity and minimal disruption.

Technological difficulties may also compromise the storage, retrieval and security of the audio recording, leading to potential data loss or challenges to its reliability. To mitigate these risks, it is important to ensure that **data is regularly saved and backed up** during the interview process.



Useful tips

The following are systems that administrations can put in place.

- Have technical support available during the interview process to address immediate issues, such as connection problems or equipment failures, for example the presence of an ICT helpdesk. It is important that support can be provided quickly to minimise disruptions to the interview.
- Ensure that case officers or other relevant personnel:
 - test all hardware, software and network connections before the interview begins;
 - regularly check that the microphone is clearly picking up the voices of the interviewer, the applicant and the interpreter and verify that the audio levels are consistent throughout;
 - know how to reach out to technical support.
- Use systems that can ensure automatic and regular saving or a backup saving system, reducing the risk of data loss.
- Put at the interviewer's disposal backup recording device(s) on standby to enable a quick switch in case the primary device malfunctions.

1.6. Audio recording of remote personal interviews

The **quality, process and technical requirements** as described in Sections [1.3 The quality of the audio recording](#), [1.4 The process of audio recording](#) and [1.5 The technical setup for audio recording](#) also apply to audio recording of interviews by videoconference ⁽¹⁵⁾.

For personal interviews via videoconference, any specificity of the process should be clearly defined. The choice of the software and hardware should be made with care to ensure the **clarity of sound**. This applies both in cases where the videoconferencing software itself is used for audio recording as well as when a different audio recording program or device(s) is used for such purpose. In the latter scenario, the software used for the interview via videoconference should be **compatible** with the audio recording equipment.

It is recommended to ensure that the interviewer or other dedicated staff **test ahead** of time that the recording captures clearly all voices in all remote interview settings (with any combination of either the interviewer or the applicant or the interpreter or two or all of them being connected online).

For interviews via videoconference, it is important to ensure a stable internet connection for all participants and prepare for the possibility of reconnecting if a technical issue arises.

⁽¹⁵⁾ Remote interviews by videoconference as set out in the APR and the AMMR require all participants in the interview to be able to communicate through both video and audio throughout the entire interview.

If the videoconference is interrupted due to technical malfunction, it is important to ensure that interviewers, case officers or other personnel responsible **check** if the audio recording was correctly generated and saved. Once the connection is reestablished, it is necessary to make sure that the audio recording **starts again** when the interview resumes.

Particular attention must be paid to saving the audio version of the recording, since certain videoconference software has the option to record the video but only the audio part of the recording needs to be recorded and saved.



Related EUAA publication

For more information on conducting the personal interview via videoconference, see the EUAA, *Guidance on Remote Interviews*, April 2025, <https://euaa.europa.eu/publications/guidance-remote-interviews>.



2. The governance and management of the audio file

It is critical that the authorities tasked with ensuring that personal interviews are recorded by means of audio recording are fully aware and have the process and setup ready to undertake this new obligation. The authorities also need to consider rules on **data governance** ⁽¹⁶⁾ and **data protection** principles. Correct governance and management of the audio file – as well as of all other sensitive data part of the applicant's file, including the written record of the interview – is essential.

The EU has a specific regulation governing most kinds of processing and movement of personal data across the EU ⁽¹⁷⁾, known as the **general data protection regulation (GDPR)** ⁽¹⁸⁾. The data protection regulatory framework is complemented in the Member States by additional rules and relevant guidance may be issued by national data protection authorities.

National data protection provisions governing the personal interview and its audio recording may need amendments to be aligned with the requirement to audio record the personal interview.

Procedural and information security measures are required to protect the significant amount of personal data, including special categories of personal data (also known as sensitive data) of applicants for international protection processed and recorded during an asylum interview ⁽¹⁹⁾. This highlights the importance of securing audio files and ensuring that sensitive personal data is processed and stored in compliance with data protection principles.

Resource implications need to be fully considered and supported. The relevant authorities must have audio recording facilities and procedures compliant with the GDPR. This may require deploying trained staff and financial resources as well as secure systems.

2.1. Data protection impact assessment

A **data protection impact assessment (DPIA)** should be undertaken to ensure compliance with relevant and applicable regulations. Specifically, a DPIA is required **under the** GDPR any time a new project is launched that is likely to involve 'a high risk' to other people's personal

⁽¹⁶⁾ Data governance encompasses the people, processes and tools required to ensure consistent and proper handling of data, in alignment with the GDPR and national data protection regulations.

⁽¹⁷⁾ EU legislation protects personal information by mandating organisations based in the EU or offering goods or services to data subjects (individuals whose personal data is processed) in the EU or monitoring the behaviours of data subjects taking place in the EU, to ensure robust data privacy practices are integrated into their data management procedures and processes.

⁽¹⁸⁾ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) (OJ L 119, 4.5.2016), <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>.

⁽¹⁹⁾ Article 6 and Article 9(1) GDPR.



information ⁽²⁰⁾. It serves to identify and mitigate against any data protection-related risks arising from the new project or amendment to the existing system, ensuring informed decisions are made and the data subject's rights are not violated.

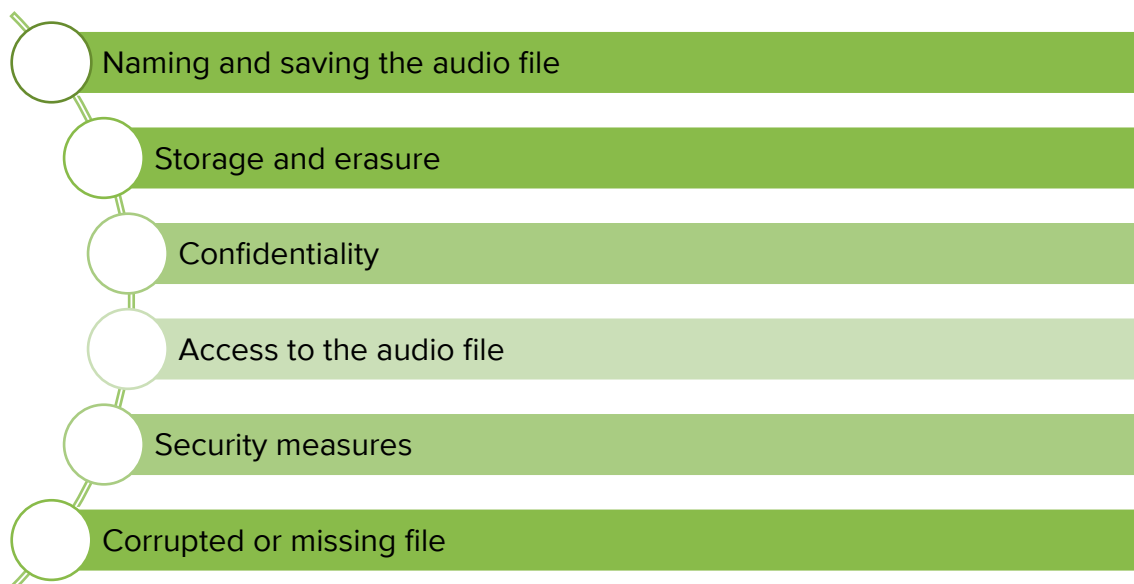
The DPIA must ensure compliance with data protection law and should be conducted by authorised data protection staff/authorities whose role it is to provide data protection advice and guidance. It should be completed prior to the commencement of the relevant data processing.

In the context of the audio recording of the personal interview, a DPIA is the appropriate tool to identify whether the technological solutions envisaged for the audio recording raise any concerns from a data protection viewpoint (e.g. on whether appropriate safeguards are in place when a transfer to non-EU countries takes place).

2.2. Managing the audio file

The key aspects of the management of the audio file should be regulated, including by **procedures and standards** covering the following elements.

Figure 7. The management of the audio file – key elements



⁽²⁰⁾ Article 35 GDPR. Concrete examples of such protections include processing personal data related to the criteria listed in Article 9(1) GDPR:

racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

See GDPR.EU, 'Data Protection Impact Assessment (DPIA)', undated, accessed 2 October 2025, <https://gdpr.eu/data-protection-impact-assessment-template/>.



(a) Naming and saving the audio file

The audio recording must be part of the applicant's file ⁽²¹⁾. Member States can decide how the recording will be attached to or included in the file, provided that it is safely stored and easily accessible.

As already detailed, national authorities need to define the naming convention and the modalities, procedures and location for saving the audio file. See also Section [1.4\(f\) Naming and saving the audio file](#).



Good practices

Automatic naming and saving in the designated location once the recording is over can minimise the risk of the recording not being (properly) saved and going missing due to human error.

If automatic naming or saving is not a viable option, measures should be taken to ensure that it is saved properly. The person tasked with this should carry out the procedure **correctly**, they should **name** the file according to the established naming convention and **save the file** in the designated location and erase it from the recording device (if applicable). Pop-up windows with reminders can help. Written guidance and training are also needed. For more information on the latter, see Section [4.2 Building user capacity](#).

(b) Storage and erasure of the audio file

In accordance with the **APR**, administrations must keep the recordings of personal interviews for **10 years** after the final decision ⁽²²⁾. The recording should be erased once the 10 years have elapsed or upon the acquisition of citizenship of a Member State by the person concerned, if this happens earlier.

The AMMR does not specify a data retention period. The recordings of interviews from the responsibility determination procedure will therefore need to be retained in accordance with applicable national rules, in conformity with the GDPR.



Useful tips

National authorities need to take into account that storing obligations might create the need for vast **storage space**. (See considerations relating to the size of the audio file in Section [1.5\(i\) The capacity of the device\(s\)/application\(s\) and storage capacity](#)).

⁽²¹⁾ Article 14(2) APR.

⁽²²⁾ Article 72 APR.



This storage space should have **safeguards** and security measures. The following can be considered:

- using recording software or devices that automatically embed watermarks or timestamps within the file metadata, making alterations easily detectable;
- storing in encrypted formats and on trusted, access-controlled servers or cloud platforms;
- ensuring that files are locked once saved and only accessible by authorised personnel to prevent unauthorised changes.

(c) Confidentiality

Measures ensuring the confidentiality of data concerning applicants, case officers, interpreters and other persons present at the interview are needed. It is critical that audio recordings and transcripts of the recording do not compromise the confidentiality of stakeholders due to unlawful sharing or other non-authorised recording of the personal interview. As mentioned, established processes should also regulate the provision of information on confidentiality and data protection in relation to audio recording. The management of the audio file and the management of the access to it is paramount to this end, as detailed in the following subsection.

(d) Access to the audio file

It is essential to have measures that clearly regulate, manage and track **access to the audio file in the authorities responsible for the personal interview**.

- Define who can have access and the various level(s) of access. Access must be strictly regulated on a need-to-know basis.
- Define how access to the recording is provided, including by which means, through which procedure and for which purpose.
- Define a workflow to ensure that access rights are revised as needed when staff that have access to the audio files move to a different function or when they leave the authority.
- Keep track, for example via audit logs, of who accesses the audio file, when and for what purpose.
- Keep track, for example via audit logs, of who updates or edits the audio file, when and for what purpose. This should be strictly regulated and authorised only in exceptional, pre-defined circumstances. On this, see Section [2.2\(e\) Security measures](#).



Useful tips

Ensure **password control** and/or **encryption** of the audio file. The use of digital signatures to guarantee the authenticity of the recording is preferable, when the possibility is available. These techniques generate a unique identifier for the file that can be used to prove it has not been altered after the recording.

The audio file must be shared with the **appeal authorities** for cases lodged before them, if admissible as evidence under national law. In the appeal procedure in the framework of the APR, access to the recording must be provided to the **applicant and their legal representative**. In particular, where the recording is admissible as evidence, the legal representative must be given access to it, including during the preparation of the appeal ⁽²³⁾.

National authorities can determine the exact modalities for providing access to the audio file to the applicant and their legal representative in these cases, as long as the manner and form in which access is provided are meaningful and sufficient to allow applicants to exercise their rights, particularly in preparing an appeal. The security of the audio file remains important and the modalities by which it will be shared need to consider this.

(e) Security measures

Measures are needed to protect the audio file from **unauthorised use, loss or alteration** due to mishandling or accident.

It is essential to ensure that audio files are both **immutable and secure**. This means that once a recording is made, it must not be altered or tampered with in any way that could compromise its integrity. Only in exceptional and clearly pre-defined circumstances could editing be done to remove segments from the audio recording that did not concern and are not part of the personal interview (e.g. if the recording was not paused or stopped during a break). Editing of the audio file should be strictly regulated in terms of who can authorise it, the reasons for which it can be allowed and who can implement it. The fact that editing took place should be documented, including who authorised it, who did the editing, the reasons for this and what was edited (audit trail).

Implementing robust **data encryption measures** (encrypted storage solutions) and/or **password protecting** files, where possible, minimises the risk that unauthorised access occurs. Alternative measures achieving the same purpose can also be considered, including allowing access only to those in possession of the specific link to the audio file.

(f) Corrupted or missing file

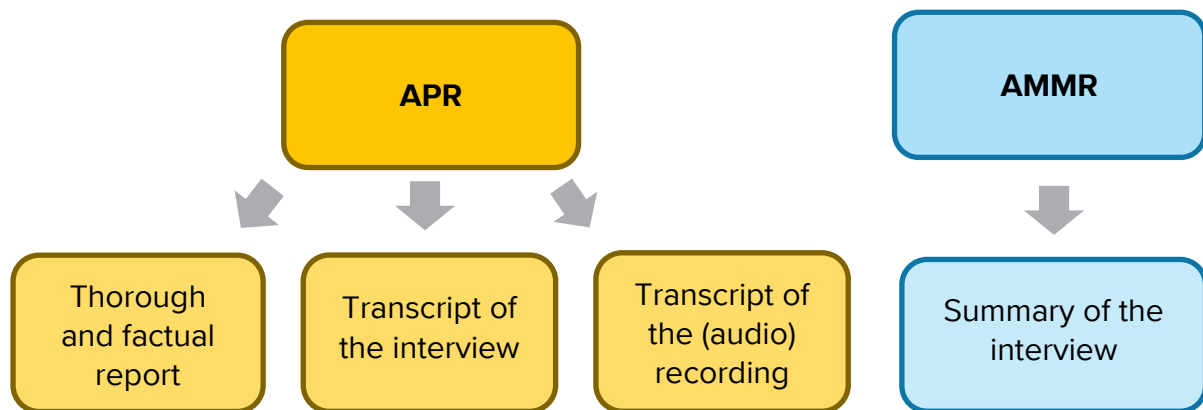
Procedures and protocols should be in place with guidance on how to address instances of **low technical quality** of the audio recording or instances where the audio file is **corrupted, missing or lost**. At a minimum, a note should be made on the file to describe and account for the issue. See Section [1.4\(g\) Handling technology failures](#) for guidance on the process to establish in the event of a corrupted, missing or lost audio file.

⁽²³⁾ Articles 14(6), 17(1) and 18(1) APR.

3. The transcript of the audio recording

In addition to the audio recording of the interview, both the APR and the AMMR require that a **written record of the interview** be kept.

Figure 8. The written record of the interview – possible formats



The **APR** provides three options to record the personal interview in a written form ⁽²⁴⁾, either:

- a **thorough and factual report**; or
- a **transcript of the interview**; or
- a **transcript of the (audio) recording** of the interview.

Relevant factors for national administrations to take into consideration when opting for one of the possible types of written record are the efficiency of the process and the desired comprehensiveness of the output.

The **thorough and factual report** should contain all the main elements of the personal interview. It must include an account of all the elements that emerged during the interview that are relevant to the claim, though it is not necessary for it to include a transcription of all the statements, questions and answers.

A **transcript of the interview** ensures a complete transcription of what is said during the interview. It is drafted or generated during the interview, though it can be edited at a later stage. The transcript of the interview is a detailed record of the statements by the applicant (as translated by the interpreter, where present), of the questions asked by the interviewer and of any statements made by any other participants present at the interview (e.g. legal guardian, legal representative, etc.). A transcript can also include notes of non-verbal sounds, grammatical errors, repetitions, silences and other occurrences during the interview (e.g. if the applicant cries, if a break is taken, etc.).

⁽²⁴⁾ Article 14(1) APR.



The **transcript of the (audio) recording** is a verbatim representation that includes a **complete account** of the audio recording. It is drafted or generated starting from the audio file. Its content is discussed in more detail in the sections that follow.

The **AMMR** requires a written **summary of the interview** containing the main information provided by the applicant. The summary may take the form of a report or a standard form. It is for Member States to determine the level of detail to be included in the summary of the personal interview, with the 'main information' being the minimum requirement. National administrations may provide the summary at the end of the personal interview or within a specified time limit ⁽²⁵⁾.

While all the types of written records mentioned above can be used by Member States, this guide focuses on the transcript of the (audio) recording.

3.1. The content of the transcript of the recording

When the transcript of the (audio) recording is the chosen method to ensure a written record of the interview, the following aspects should be considered.

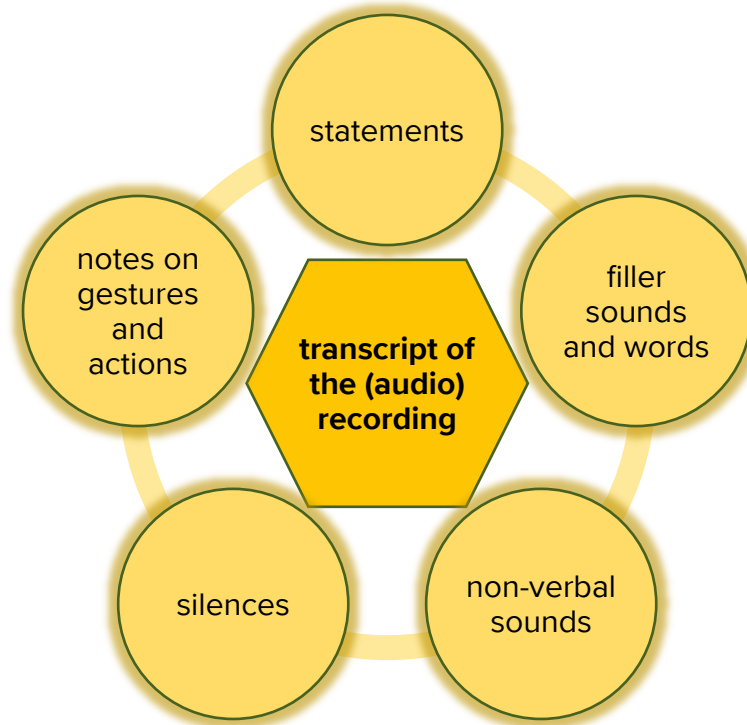
It should include a **word-by-word transcription** of all that is being said in the way it is said (in the official language(s) of the administration). It should include all the applicant's **statements** (as translated by the interpreter, where present) as well as the questions asked by the interviewer and statements made by other participants present at the interview, if any.

It is important that relevant notes on non-auditive events occurring during the interview, such as **gestures** and **actions**, are added to the transcript. The same applies to notes on **non-verbal sounds** such as laughing, crying, etc. and moments of (long) silence.

⁽²⁵⁾ Article 22(7) AMMR.



Figure 9. The content of the transcript of the (audio) recording – key elements



To produce or generate a transcript of the recording, the **quality of the audio** file is very important, since it has a direct influence on the accuracy of what will be transcribed. Otherwise, there is a risk of loss of the statements/words/sounds in case of technical failure or low quality of the audio file. See Section [1.3 The quality of the audio recording](#).

As is true for any kind of written record of the interview, errors or gaps might initially be present in the transcript of the recording. It is therefore important that the person responsible for the transcript can and does **check** and makes the necessary **amendments** to ensure its accuracy and completeness. It is important that manual elaboration during or after the interview is allowed, also for automatically produced transcription, as the initial transcription can contain errors or inaccuracies. Timestamps in the audio file can help tracing the section of the recording that needs to be consulted. For more information on timestamps, see Section [1.5\(f\) Time marking features](#).

For applicants that might non-verbally express themselves (e.g. by crying in between statements or expressing themselves hesitantly or using gestures) or who might have a speech impairment (e.g. stuttering), **relevant notes** should be made by the interviewer to the transcript, whether the latter is manually or automatically generated.

The written record and the audio recording must form part of the **applicant's case file** ⁽²⁶⁾.

⁽²⁶⁾ Articles 14(1) and (2) APR.



3.2. The modalities of transcription

The modalities of transcription of the recording (and of the interview) are not as such regulated by the APR. The transcript of the audio recording can be produced **manually** by the case officer or other assigned personnel, by typing or writing it. The transcription could also be **automated** and generated through a software.

Automated transcription

Based on the technology chosen, the software can either receive the necessary input from the interview or the audio recording.

The software should ensure an accurate record of the interview and thus should be able to fulfil the following requirements.

- Recognise and transcribe the language of the interviewer and the interpreter, i.e. the official language(s) of the administration. Generate a correct and complete word-by-word transcript.
- Reflect the particularities of oral speech against written text, incorporating for instance filler words (such as 'um', 'ah', 'hmm'), abbreviations, toponyms, numbers/dates, etc.
- Recognise naturally flowing speech (as opposed to dictated speech), for more time-efficiency.
- Recognise accents and language variations of the official language of the administration (e.g. dialects or regional accents).

The use of automated transcription should comply with the EU legal framework, including relevant provisions regulating data protection and the use of artificial intelligence ⁽²⁷⁾. The security of the data, including when using cloud services, should always be considered and ensured.

3.3. Safeguards for applicants and correctness of the transcript of the recording

In accordance with the **APR**, authorities must always give the applicant the opportunity to **make comments or provide clarifications**, either orally or in writing, on the transcript of the audio recording. This is also the case for the transcript of the interview and the factual report, unless, under national law, the audio recording or its transcript can be admitted as evidence at

⁽²⁷⁾ These include, amongst others, the GDPR; Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) (Text with EEA relevance) (OJ L, 2024/1689, 12.7.2024), <https://eur-lex.europa.eu/eli/req/2024/1689/oj/eng>.



appeal or if it is clear that the applicant will be granted refugee status or subsidiary protection (when the latter offers the same rights and benefits as refugee status) ⁽²⁸⁾.

In particular, where the written record of the interview takes the form of a **transcript of the audio recording**, the authority must ⁽²⁹⁾:

- ensure that the applicant is informed of the entire content of the transcript of the recording, with the assistance of an interpreter where necessary;
- ensure that the applicant is given the chance to comment on or clarify ‘any incorrect translations or misunderstandings or other factual mistakes appearing’ in the written record;
- give the applicant and their legal representatives access to the written record as soon as possible after the interview and, in any case, in due time before a decision on their application is made.

Authorities can make the possibility to provide comments and clarifications available to the applicant either at the end of the personal interview or within a specified timeframe before a decision on the application is made.

If doubts remain regarding the statements the applicant made during the interview, then **the audio recording** will need to be consulted and it **must prevail** ⁽³⁰⁾. In this case, the (relevant portion of the) audio recording should be consulted after the interview with the support of an interpreter.



Good practice

When consulting the audio recording for checks in case of doubt, it is good practice that, where available, the interpreter supporting the check is different from the one who assisted in the interview, for reasons of neutrality.

Under the **AMMR**, authorities must ensure that the applicant (or their legal adviser or other counsellor legally representing them) is given the opportunity to **make comments or provide clarifications**, either orally or in writing, on the summary of the interview. To this end, authorities must ⁽³¹⁾:

- ensure that the applicant has the chance to comment or clarify on ‘any incorrect translations or misunderstandings or other factual mistakes appearing in the written summary’;
- give the applicant and their legal representatives access to the summary as soon as possible after the interview and, in any case, before a decision on the Member State responsible is made.

⁽²⁸⁾ Articles 14(3), (4) and (5) APR.

⁽²⁹⁾ Article 14(3) APR

⁽³⁰⁾ Article 14(4) APR.

⁽³¹⁾ Article 22(7) AMMR.



Authorities can make the possibility to provide comments or clarifications available to the applicant either at the end of the personal interview or within a specified time limit.

If doubts remain regarding the statements the applicant made during the interview, then **the audio recording** will need to be consulted and it **must prevail** ⁽³²⁾. In this case, the (relevant portion of the) audio recording should be consulted after the interview with the support of an interpreter. It is advisable that, if possible, the interpreter supporting the check is different from the one who assisted in the interview, for reasons of neutrality.

⁽³²⁾ Article 22(7) AMMR.



4. Building capacity

4.1. Building system capacity

There are several options that should be considered to improve and update the system in place for the production, management and storage of the audio recording and thereby build its capacity.

- Ensure that the technology and equipment undergo regular checks and maintenance to make sure any bugs or errors are identified.
- Put in place a mechanism to promptly report and record issues and problems.
- Provide personnel responsible for the production, management and storage of audio recordings with a means to provide feedback on usability, positive aspects and challenges. This allows administrations to improve and update the system accordingly.
- Set up corrective mechanisms to ensure proper functionality and robustness.
- Ensure the systematic documentation of changes to any element of the system or step of the process. This allows proper change management and accounts for possible consequences of the change on the rest of the system and process(es).
- Have in place mechanisms for the quality checks of the audio files and the related process. These could take the form of regular or ad hoc checks. They could look into:
 - the technical quality of the audio (e.g. can the voices of all participants in the interview, including their non-verbal sounds, be clearly heard?);
 - the completeness of the audio (did the audio record the entire personal interview?);
 - the process requirements (e.g. is the recording saved in the correct format, following standard naming convention and in the defined location?).
- Establish quality assurance mechanisms coupled with follow-up mechanisms to ensure that punctual or structural corrective actions are taken as needed.
- Conduct audits or monitoring at regular intervals or as necessary.

4.2. Building user capacity

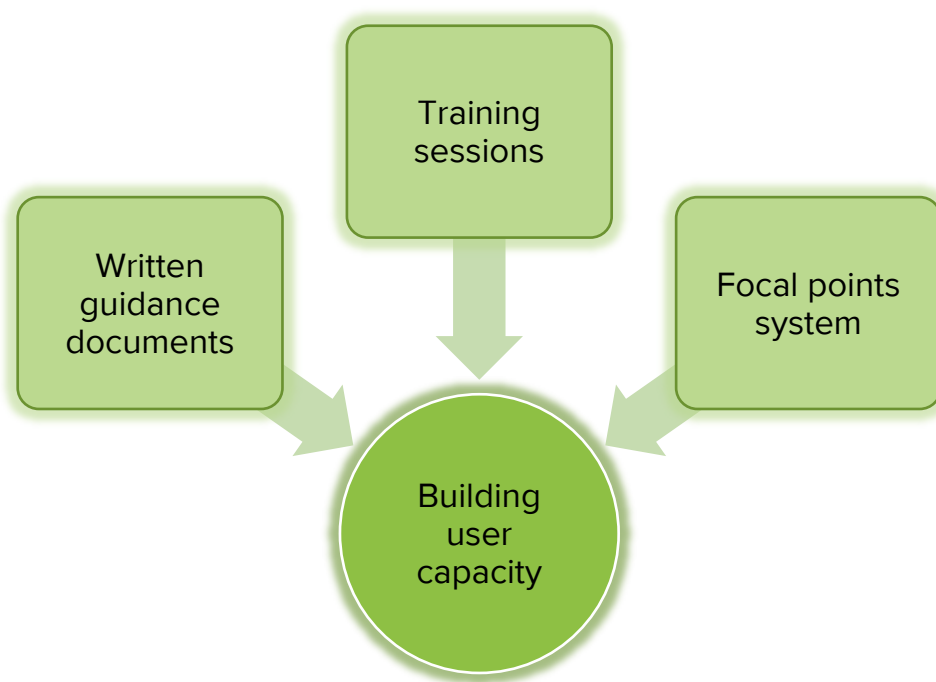
To ensure that audio recording systems are properly set up, managed and used, all relevant users must be familiar with the procedures for conducting and managing audio recordings.

Depending on the national setup, relevant users may include case officers, reviewers/managers, file managers, technical support staff and others involved in handling or managing audio recordings.

Several options might be particularly beneficial to build user capacity.



Figure 10. Building user capacity



4.2.1. Written guidance documents

Guidance documents – such as standard operating procedures, user guides and manuals – should include key guidance and provide clear instructions on:

- information provision on audio recording;
- the checking and testing of the equipment;
- how to operationalise the audio recording in the interview setting, the use of the technology and the procedures to follow;
- the naming, saving, storage and erasure of the audio file;
- the access to the audio file;
- procedures to follow if the equipment fails and in the event of corrupted, missing or lost audio files;
- who is responsible for each action as well as the corresponding timeline.

See also Sections [1.4 The process of audio recording](#), [1.5 The technical setup for audio recording](#) and [2.2 Managing the audio file](#).

Written documents may also help to address frequently asked questions. They should especially contain information on the correct handling of possible scenarios and troubleshooting (e.g. what if the audio recording device/software does not work or if the audio file is corrupted, etc.). They could include visuals (e.g. pictures, links to explanatory videos, etc.). They should be disseminated to and easily accessible by all concerned personnel.



These written documents should be continuously updated with relevant information, including with frequently asked questions, scenarios and other relevant aspects that were not covered in the initial version. Updates should be disseminated accordingly.

4.2.2. Training sessions

Another important option to build capacity is to train all users on how to use audio recording technology and apply relevant procedures, including for managing the audio file.

This training could be part of the **induction** package for the respective roles. Training could also be delivered based on needs. Initial training can be complemented by **continuous training** as needed (refreshers, updates). These could also take the form of tutorials hosted in the intranet that users can watch as required.

The training, created based on the established guidance documents, should clearly explain the necessary procedures and measures to be followed (including how to operate the equipment, how to name, save and manage the file, what information to provide to the persons present during the interview) and the technical settings to be used. Relevant considerations on special procedural guarantees for applicants in need should also be included.

Training sessions should be **tailored to the specific needs of the users**, for example as follows:

- training for personnel tasked with audio recording (e.g. case officers or interviewers) should cover all necessary procedures relating to the operationalisation of the audio recording, including the use of technology, pre-interview checks as well as naming and saving of the audio file;
- training for all personnel tasked with managing the audio file should cover aspects relating to how and where to save and store the recording;
- training for the personnel tasked with regulating and providing access to the recording should cover the conditions to provide access to the audio files.

It would be useful and would boost efficiency if all training also specifically includes information on how to troubleshoot, how to solve common issues and where/how to look for support. It would be beneficial if training involved practical exercises and simulations.

4.2.3. Focal point systems

A group of focal points could be set up in every relevant authority/office.

These focal points would be **trained and regularly updated** on novelties and serve as **multipliers and contact points** for other colleagues in case problems arise in day-to-day business.

The group of focal points would ideally include **staff from all the key areas** involved in the audio recording, including ICT, case processing, file management, etc.



Publications Office
of the European Union

