

Press and Public Relations Branch

Photography Retention and Disposal Policy

1. Introduction

This policy is designed to be used by staff and consultants of the Northern Ireland Policing Board (the Board) when dealing with photography of Board and DPP events such as public meetings, briefings and community engagement events. Photographs are taken, on average once every two weeks in addition to in house photography.

2. Scope

The policy gives direction on how photography should be retained and disposed of. All photography should be filed and labelled in line with the accompanying guidance to ensure that the review of photography is straightforward.

The policy comes into effect on 30th September 2007 and will be reviewed by Board staff every 3 years from this date.

3. Use of Photography

All photography requested by the Board is held in electronic form in the Photography section of TRIM. Paper copies of photographs issued along with permission forms are filed in a locked area. Design and photography consultants used by the Board are requested to confirm that all photography is held securely in storage.

4. Business need

The Board arranges photography to accompany news releases, to upload to the website and for use in publications. The need to retain relevant photography will be decided by the Press and Public Relations Manager.

5. Historical purposes for the production of documents

Photography with historical value should be retained for longer than the set period of 5 years. Permissions of subjects will need to be refreshed before using them again as, even if permission has already been granted, it needs to be updated before use to reflect any change of circumstances.

6. Permissions

In line with the Data Protection Act, permissions need to be sought for all photography used by the Board. When taking photographs, those included must be informed that the photography may be used in Board publications, to accompany news releases and published on the Board's website.

The permission of all subjects should be asked directly. In the case of a meeting, an announcement will be made verbally by the Chairman of the meeting. At public Board meetings, this announcement will be supported by written signs which will be clearly visible to the public and press galleries.

Anyone not content to give their permission are asked to make this clear to Board staff who will ensure they will not be included in photography or photography already taken will be deleted and not used.

A note must be kept of each set of photographs identifying whether verbal or written permission was sought and/or given. Any written permissions/denials of permission must be saved on file.

The options are:

- a. Permissions requested and granted – a record should be kept on the system and in the photography file of written and/or verbal permissions. The photo should be retained on file for future use.
- b. No permission gained but could be sought – if it is unclear whether a person has given permission and it can be sought again.
- c. No permission – if a person has clearly not given their permission for the photo to be used. In these cases, the photograph must be deleted.

The Board's Press and Public Relations Office will consider whether the photography is relevant, timely and has the necessary permissions.

If the Board/DPP is reconstituted before permission expires, permissions will need to be sought again.

During a period of reconstitution, generic photography should be used in place of specific Board members such as the Chairman. This needs to be considered by staff when issuing statements and news releases during this period.

7. Legislation and Standards

The Policing Board has a duty under the Data Protection Act 1998 to ***“...protect the rights and privacy of living individuals and to ensure that personal data is not processed without their knowledge and, wherever possible, is processed with their consent.”***

8. Retention and Disposal

The Board's Retention and Disposal policy advises that ***“...electronic records containing personal information about individuals are kept as long as it is required...”***

9. Review of photography

All permissions for the use of photography will be reviewed after 1 year. Press and Public Relations staff will assess all photography for historical value. If they are deemed suitable for future use, they will be kept on file. If not, they will be deleted from the system and back up files. Staff will also review photography permissions and delete those for which permission is not given.

During each review, the Branch will review the photography provided for downloads on the website, making sure that imagery is up to date and relevant. Consultants and photography agencies used by the Board are requested to confirm that all records are stored securely. Should a consultant or photography agency cease to be employed by the Board, they will be requested to return all photography to the Board to be stored securely.

As much of the photography used and stored by Press and Public Relations staff originates from DPPs, DPP Managers should be given an annual reminder of their responsibilities under Data Protection in respect of photography.