

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.

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.

The policy was effected on 30th September 2007 and reviewed in November 2010. A further review will take place in 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. Consultants used by the Board are requested to confirm that all photography is held securely in storage, in line with Information Security and Data Protection Legislation and that Copyright of photographic material rests with the Board.

4. Business need

The Board arranges photography to support public relations activity including online media and publications. Photography is retained in line with Board Records Management policies and Departmental guidance.

5. Historical purposes for the production of documents

Photography with historical value may be retained for longer than the set period of 5 years. Permissions of subjects will be refreshed before reuse of any image falling into this category.

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 public relations activity including online and in publications.

The permission of all subjects should be asked directly. In the case of a meeting, an announcement will be made verbally by the Chair 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.

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 are saved on file.

The options are:

- a. Permissions requested and granted – a record should be kept on the system 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 before use.

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 Chair. This needs to be considered by staff when issuing statements and news releases during this period.

Permissions for the use of photography will be reviewed after 1 year.

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

As part of ongoing Records Management policy, Press and Public Relations staff will assess photography for historical value at time of review. 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.

On an ongoing basis, the Branch will review photography provided for download on the website, making sure that imagery is up to date and relevant. Consultants used by the Board are requested to confirm that all records are stored securely. Should a consultant 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.