

# NORTHERN IRELAND POLICING BOARD

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## **POLICY ON PHOTOGRAPHY AND FILMING / RETENTION AND DISPOSAL**

## **Northern Ireland Policing Board**

### **Policy on Photography and Filming / Retention and Disposal**

**Drafted: September 2007**

**Last Review: April 2021**

**Date of Next Review: April 2023**

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#### **1. Introduction**

The Northern Ireland Policing Board (the Board) uses photography images and video footage to support communications activity including use in online media and publications.

This policy is used by staff and consultants of the Board when photographing and filming Board and Policing and Community Safety Partnership (PCSP) events such as public meetings, briefings and community engagement events.

Photography and filming (live streaming, recordings of meetings, short films, vox pops and video clips) is taken by Policing Board staff. On occasion, photography and video footage is also provided by PCSPs, the Board's contractor, the PSNI, other statutory agencies working on policing and community safety issues and media outlets.

#### **2. Scope of policy**

The policy gives direction on consent requirements, and how photographs and video footage should be used, retained and disposed of.

#### **3. Legislation and Standards**

In the use of photography and film to support the Board and PCSP communications activity, the Board will ensure it complies with its duties under the Data Protection Act 2018. The Board's privacy notice for the use of photography and filming can be found at Annex 1.

The copyright of all photographic material rests with the Board unless otherwise specified.

All photography taken or received for use by the Board is held in electronic form in the Photography section of the Board's Electronic Records Management System (HPRM). The Board's consultants are contractually required 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. Consent requirements

In line with Data Protection legislation, written consent is required for all photography / video footage used by the Board where individuals are identifiable. All subjects of photography/filming must be informed that photographs/ footage may be used in Board communications activity including online and in publications.

Those included are required to confirm consent in writing.

In the case of a public meeting or event, an announcement is made verbally by the Chair of the meeting and supported by written signs which will be clearly visible to attendees. A written record of this should be kept in the photography section of HPRM.

Anyone not content to give their consent will be asked to make this clear to Board staff who will ensure they will not be included in photography / filming.

A note must be kept in the photography folder of each set of images confirming consent has been given. Consent will be held in the filming folder.

The Board's Communications Branch will be responsible for considering whether the photography or video footage, relevant, timely and has the necessary consent before use in any communications activity.

During a period of reconstitution, generic photography will be used in place of specific Board members.

#### 5. Retention and Disposal

All written consents or requests for deletion of imagery are retained on HPRM.

- a. Consent obtained. The photo/video should be retained for future use with the consent form.
- b. No consent. If no written consent has been provided and it is not possible to obtain consent the image(s) must not be used. In these cases, the photograph/video will be deleted.

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

**Photography and video material will be reviewed after 5 years.** The consent of identifiable subjects will be refreshed before reuse of any image falling into this category.

As part of ongoing Records Management policy, Communications Branch staff will assess photography for historical value in line with the Retention and Disposal Schedule. If they are deemed suitable for future use, they will be kept on file. If not, they will be deleted from the Board's HPRM system.

On an ongoing basis, the Communications Branch will review photography provided for upload to online media making sure that imagery is up to date and relevant.

Should a consultant cease to be employed by the Board, they are contractually required to confirm that all photography/ video footage relating to the Board has been deleted from their records.

## 6. Online notice regarding image / video use

The following notice appears on the Policing Board and PCSP Facebook accounts:

**'Please note that this page is publically viewed and is used as an archive of Board / PCSP work. Images and video footage should not be used for any other purpose. The Policing Board will not accept any responsibility for any unauthorised use of images or video footage contained on this page. Any use of this Facebook page indicates your agreement with these conditions. All photography will be retained on this page unless the Policing Board directs otherwise. In that case, anyone who appears in photography or video who no longer wants their image to be available on this site, should contact Policing Board staff by email at [consent@nipolicingboard.org.uk](mailto:consent@nipolicingboard.org.uk) or by phone on 028 9040 8542 to have it removed. You can view the privacy notice regarding use of photography/video footage on our website at [www.nipolicingboard.org.uk](http://www.nipolicingboard.org.uk)**

There is a link to this notice on the Policing Board and PCSP Twitter accounts.

## Annex 1

### Privacy Notice – Use of photography and video footage

**Data Controller Name:** Northern Ireland Policing Board

**Address:** James House  
Block D  
2 – 4 Cromac Avenue  
Gasworks  
Belfast, BT7 2JA

Telephone: 028 90408500

E-Mail: [information@nipolicingboard.org.uk](mailto:information@nipolicingboard.org.uk)

**Data Protection Officer Name:** William Magee

Telephone: 028 90408500

Email: [Data.protection@nipolicingboard.org.uk](mailto:Data.protection@nipolicingboard.org.uk)

#### Why are you processing my personal information?

- State the purpose of processing:

**We will use your personal information (image and video footage) in communications and awareness raising activity on the role and work of the Northern Ireland Policing Board (the Board) and the role and work of Policing and Community Safety Partnerships (PCSPs).**

Outline the lawful basis for processing i.e. consent; contract; legal obligation; vital interests; public task or legitimate interests.

**We have identified the lawful basis for processing your personal information as consent and as such the Board will require your written consent to be able to use your image in our communications activity. We will ask you to complete a form giving your consent and confirmation of consent being given will be held on our system.**

You have the right to ask us to delete your image/video footage from our records at any time and you can do so by contacting us by e-mail at [information@nipolicingboard.org.uk](mailto:information@nipolicingboard.org.uk) or by phoning the Board at 028 90408541 and asking for the Communications Branch.

### **Do you share my personal data with anyone else?**

- **The Board's communications activity includes the use of online media, films and publications to promote the role and work of the Policing Board and the role and work of Policing and Community Safety Partnerships (PCSPs). As such Board and PCSP communications material produced will be shared and used by other partner agencies who work within the policing and community safety environment including the Department of Justice, the Police Service of Northern Ireland, the Probation Board, the Northern Ireland Fire and Rescue Service, the NI Housing Executive, the Youth Justice Agency, the Education Authority and the Health and Social Care Trusts.**
- **We may also have to share your personal data with the Information Commissioner's Office (ICO) if you complain to them about how we have handled your information.**

### **Do you transfer my personal data to other countries?**

- **The Board does not transfer personal information overseas.**

### **How long do you keep my personal data?**

We will retain your data in line with our Retention and Disposal Schedule.

### **What rights do I have?**

- **You have the right to object to the processing in specific circumstances.**

### **In addition:**

- **You have the right to obtain confirmation that your data is being processed and access to your personal data.**
- **You are entitled to have personal data rectified if it is inaccurate or incomplete.**
- **You have a right to have personal data erased and to prevent processing in specific circumstances.**
- **You have the right to 'block' or suppress processing of personal data in specific circumstances.**

- You have the right to data portability in specific circumstances.
- You have rights in relation to automated decision making and profiling.

**How do I exercise my rights or complain if I am not happy?**

**You can find out more information about your rights on the [Information Commissioner's Office website](#) or you can contact them at the address provided below.**

**If you wish to exercise any of your rights or if you are unhappy with any aspect of this privacy notice please contact the Board's Data Protection Officer at:**

Northern Ireland Policing Board  
James House, Block D  
2 – 4 Cromac Avenue  
Gasworks  
Belfast  
BT7 2JA

Email: [Data.protection@nipolicingboard.org.uk](mailto:Data.protection@nipolicingboard.org.uk)

**If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):**

**Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>

## Northern Ireland Policing Board

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2 – 4 Cromac Avenue  
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Belfast  
BT7 2JA

 028 9040 8500

 [information@nipolicingboard.org.uk](mailto:information@nipolicingboard.org.uk)

 [www.nipolicingboard.org.uk](http://www.nipolicingboard.org.uk)

 [policingboard](https://www.facebook.com/policingboard)

 [@nipolicingboard](https://twitter.com/nipolicingboard)

 [nipolicingboard](https://www.youtube.com/nipolicingboard)

 [Northernirelandpolicingboard](https://www.linkedin.com/company/northernirelandpolicingboard)

## DOCUMENT TITLE

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April 2021**

## ONLINE FORMAT

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This document is available in PDF format from our website. This document may also be made available upon request in alternative formats or languages. Requests should be made to the Northern Ireland Policing Board.

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