

Fermanagh Genealogy Centre

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Drafted by	Vivienne Carson	Approved by Board	2019
Responsible Person	Mervyn Hall	on Scheduled review date	2020

Photography Policy

FGC are committed to looking after your personal data in a way that is safe and secure, handling it in a responsible manner in compliance with data protection law.this includes photography

- Individual.
- Organised Group.
- Children.
- Use of photographs for purpose other than those for which consent has been obtained.
- Publishing photographs on the web.

Individual

Prior to taking a photograph of an individual, the individual must be informed of the purpose(s) for which the photograph(s) will be used and asked to give their consent. In addition, the individual should be provided with any other necessary information to ensure fairness and transparency. By way of example, the individual should be informed whether the photograph(s) will be passed to a third party or displayed on the internet. If this is not clearly explained to the individual prior to taking the photograph(s) then the photograph(s) may not be passed to a third party or displayed on the internet. The individual must also be informed of whether the photograph(s) will be used for marketing purposes and given the opportunity to “opt out” of this purpose if he/she so wishes.

It is recognised that there may be occasions when, in order to ensure that a photograph appears ‘natural’, it needs to be taken without the awareness of the person(s) being photographed. On these occasions the individual(s) must be informed of the purpose(s) of the photograph as soon as the photograph is taken and asked for his/her consent. Where consent is refused, the photograph must be destroyed immediately and this action should be documented.

In each circumstance the model release form “For Individual Consent” must be completed and signed by the individual (or the applicable Parent or Guardian if the individual is under 18 years of age) and retained with the relevant photograph(s) for recording purposes.

Organised Group

For an organised group, such a members /volunteers meeting either in a indoor or outdoors inform the group of the purpose for which the photograph(s) are to be used and give the opportunity for individuals to opt out (i.e. temporarily leave the group). The date of each photograph and the identity of the group should be documented and retained with the original photograph

Children

For an individual child and groups of children, the school or college (whichever is applicable), the parents of the relevant children and the children themselves must be informed prior to taking the photograph(s) of the purpose(s) for which the photograph(s) will be used, any other necessary information to ensure fairness and transparency (by way of example, whether the photograph(s) will be passed to a third party or displayed on the internet)

and whether the photograph(s) will be used for marketing purposes. If this is not clearly explained to the parents of the relevant children and the children themselves prior to taking the photograph(s) then the photograph(s) may not be passed to a third party or displayed on the internet or used for marketing purposes

Use of Photographs for purposes other than those for which consent has been obtained

If the consent of an individual has been obtained for limited purposes and it is subsequently wished to use the photograph for another purpose, especially if the use is by an individual or external body other than FGC, the further consent of the individual(s) must be obtained.

Publishing Photographs on the Web

If it is intended to make photographs available on the web. Publishing on the Internet potentially transfers personal data outside of the EEA (the fifteen EU Member States together with Iceland, Liechtenstein and Norway) for which rules on gaining consent from individuals are much stricter. If photographs are to be published on the Internet, written consent should be obtained from the subject(s) on a standard release form