

Process Id# :: 0007
Process Name :: Staff Photographic Identification & Photo Policy
Date Last Updated :: 31/3/2021

Description ::

The Data Controller for the photographic images is the National Shared Services Office (NSSO). The NSSO requires all staff employed by the NSSO on a permanent, temporary or on a contracted basis including through a third party contractor, to submit to photographic identification.

The primary legal basis for this processing is the NSSO's legitimate interest (Article 6.1.f as an internal function) in securing access to its premises.

Purpose of Processing ::

This requirement also helps the NSSO fulfil its legal responsibilities (Article 6.1.c) under Health, Safety and Welfare at Work Act 2005, to all staff, and to ensure the security and integrity of information, held at offices, in line with its responsibilities under Data Protection legislation.

The photograph will be used for the purposes of staff identification and will be displayed on the integrated staff identification card/access control card/flexi card/managed print card and/or the Department Authorised Officer Card. The card will be used for access to some buildings and car parks.

There are currently two additional places where a staff member may wish to place their photography, one being the organisation chart visible on the intranet and the second being the Skype instant messaging facility. On Skype you can upload a photograph by clicking on the image/peg in the very top left corner and click 'Change my Photo'.

If a staff member wishes they can upload a photograph for use on the internal phonebook/organisation chart which is found on the intranet. The placing of the photograph on the phone book/org chat is entirely voluntary and consent there may be withdrawn at any time. HR will usually take that photograph when you join, but this has not always been possible.

The NSSO has undergone a lot of growth and change in recent years with significant staff mobility. It is also a regionally dispersed organisation. As a way of bringing people closer together and enabling people to put faces to names, we do ask that you provide a photo so that the phonebook / organisation chart is up to date. The placing of your photograph on the phone book is entirely voluntary. You may withdraw your consent at any time.

Senior staff should be aware their image will also appear on <https://whodoeswhat.gov.ie/root/nss/>

Access & Control ::

The issuing of these cards on which the photographic ID is printed is dealt with by a small dedicated Unit in the Facilities division. The photographic images are held on the Department Network, on a secure server, with access limited to the staff in the dedicated Unit in Facilities.

Staff are asked to supply a Head Shot for use on the card. The image should be taken against a light background and be square in shape. It will approximately appear on the card as a 90 x 90 pixel image.

For clarification any photograph supplied will only be used for the purpose of the ID/Access Card. Once the card is produced the photo will be deleted from the Facilities Folder (keyfob@peoplepoint.ie) but will remain on the Access System for the duration of Employment with the NSSO.

Some other details in addition to the photograph will be retained. These details include :: your name, grade, office location, organisation, section or team and card number. Access to this system is strictly controlled. If a staff member leaves the Organisation the card and all details are deleted as part of the leaver's process.

Staff using the 'Skype' system can choose to replace the standard grey/white peg icon with a head shot. By placing a photograph here staff should be aware the photograph will sync with Outlook and present to others on the same

OGCIO platform. This includes other civil service organisations such as Departments of Housing, Rural & Community Development, Public Expenditure and Reform, etc.

The NSSO has now asked staff to utilise this feature and so staff use it are being deemed to have knowingly consented to using it in a professional capacity and should be aware emails featuring such images may form part of disclosures in FOI and other legal obligations. Images should comply with all dignity at work principles. The choice of image used can reflect on your professionalism and staff are encouraged to use an image similar to that used on their ID card.

Staff who are happy to provide a photo for the phone book / organisation chart should provide a head shot for use. The photo should be against a plain background, ideally cream, white or light blue in line with the style of the existing photographs on the system. If you wish to send an appropriate photo for use on the photobook / organisation chart you can send it to NSSOLHR@nssso.gov.ie. HR upload the pictures to a secure folder where they are edited to a specific size. HR periodically go through the folder to delete the photos of staff who have left the NSSO.

General Principles of Photo Use ::

- The photographs will not be shared or used for any other purposes unless with the express consent of the individual.
- The photographs will only be held for the duration of employment. When a staff member leaves the NSSO, Facilities will delete their photo and ID card.
- All queries regarding the use of the photographic image on the ID card should be directed to the Facilities Division at the following email address keyfob@peoplepoint.ie
- All queries regarding the use of the photographic image on the other systems should be directed to HR Division at the following email address NSSOLHR@nssso.gov.ie

Photographs taken at NSSO events for corporate use ::

This process will be reviewed shortly.

The NSSO will from time to time run or participate in events which staff or external guests may attend. Such past events have included awards ceremonies, annual stakeholder conferences, training courses, away days etc. Photographs may be taken at such events for use by the NSSO for differing purposes. Each different processing use listed has been considered against the DPC's [2019 advice](#) on photographic use in large groups and smaller clusters of persons.

The NSSO is using its legitimate interest (Article 6.1.f) as the legal basis for the processing activity of the **taking** of photographs at such events.

The NSSO is using consent (Article 6.1.a) as the legal basis for **the later use** of such photographs, where the data subject is clearly identifiable, in its various media. Such uses include ::

1. In internal NSSO media, such as in posters, weekly newsletters, intranet communications, etc.
2. In corporate NSSO publications such as the annual report, statement of strategy, etc.
3. On social media such as Twitter, LinkedIn, etc.

As the NSSO is relying on consent for the use of peoples images for the purposes (1-3) then the conditions of for giving consent ([Article 7](#)) must be met.

7.1 The NSSO should be able to demonstrate the data subject consented to the photo being taken :: While the taking of the photograph is using A6.1.f, the NSSO will ask **all photographers** to seek the verbal permission of individuals at the time of taking. Where the NSSO later decides it wishes to use that photo for any of purposes 1-3, the NSSO Communications team will contact the data subject and document their consent.

7.2 *"If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters"* :: Where the NSSO seeks written consent it will explicitly call out how it intends to use that image. This applies to staff as well as to external data subjects. For example, if the NSSO hires someone to

Speak at a corporate function will be told if their contribution will be recorded for later corporate use and whether it is a condition of contract or a matter of consent.

- 7.3 The data subject has the right to withdraw consent at any time. This does not affect the lawfulness of processing prior to consent being withdrawn. This has the following consequence ::
1. Internal media : Image will not be use or re-used if previously used
 2. Corporate publications : Image will not be use or re-used if previously used. Publications already using the image will not be withdrawn.
 3. Social Media : The image will be taken down/deleted from social media and not re-used.
- 7.4 Consent must be freely given :: No person, staff member or external customer, should feel coerced into giving consent. For example, there may be occasions where the data subject feels under pressure to get into a group photo due to peer pressure, due to the presence of a senior official/Minister or for other reasons. The data subject may not feel freely able to refuse to participate in the moment or disclose their discomfort.
- a. The NSSO will not apply any pressure on people to participate in photographs.
 - b. The NSSO will communicate with data subjects prior to the first publication of images featuring identifiable data subjects to seek consent.
 - c. The NSSO will endeavour to remove/crop persons where requested and where that is not possible will not use the image.
 - d. The NSSO will respect where permission is given for some uses but not others. For example some staff may give consent for their image to be used internally but not on social media.

Any queries about the NSSO's corporate use of images should be directed to Communications@nss.gov.ie

Frequently Asked Questions ::

Why would the NSSO like me to put my photo on the internal phonebook / Skype-Outlook?

Photographs on the phone book put a human face to the name when dealing with your colleagues, which is particularly pertinent in a geographically dispersed organisation like the NSSO. This has been proven to enhance communication between staff on every level in successful organisations, and allow for stronger working relationships.

Is it compulsory to put my photo on the phonebook / Skype-Outlook?

No, this process is entirely voluntary.

Is it just for internal use or will the general public be able to see my photo?

The phonebook can only be accessed on the OGCI0 shared service platform so the general public will not have access. Colleagues in other OGCI0 shared email/instant messages platforms (DPER, D/Finance, D/Housing, D/RCD and others) will have access to photographs you choose to use in the Skype/Outlook client.

Where is my Skype photo coming from?

Staff photos are held on a secure server that is only accessed by a small number of members of the HR Division. Through consenting to your photo being used, the phonebook draws your photo from this server and places it on your profile. It identifies each individual through their computer log-on name. At no point in this process does this photo leave the server, and nobody else has access to your photo.

How can I change my photo?

If you wish to update your photograph with the HR Division, you may do so in the following ways:

- A high quality jpeg image may be sent as an attachment to NSSOLHR@nss.gov.ie.
- Arrange an appointment with HR to have your picture retaken. You can do this by emailing your request to: NSSOLHR@nss.gov.ie

If I change my photo, how long will it take to update on the phonebook?

Once your photo is placed into the secure server it will update automatically on the phonebook.

If I leave/retire/transfer from the NSSO what happens to my photo?

Your photo is deleted from the fob server, and automatically removed from the phonebook.

How long is my photo held for?

Your photo on the ID card is only held for the duration of your employment with the NSSO. HR will periodically delete photos from their folders once a staff member has left the NSSO.

Can other staff members use my photo?

No. Photographic images are personal data. Explicit written consent from the staff member is needed to use a photo for any reason other than the staff ID cards. The copying or usage of staff photographic images from the phonebook without the explicit consent of the individual in question is a breach of their data protection rights. Disciplinary Procedures may be invoked if photos are used from the phonebook without the consent of the individual in question.

Is there something to stop another staff member from using my photo for other purposes anyway?

Yes. The NSSO's Disciplinary Procedures may be invoked if photos are taken from the phonebook without the consent of the individual in question.

Is the use of the photo compliant with the General Data Protection Regulation (GDPR)?

Yes. Staff images are personal data. Explicit consent is needed to use a photo for any reason other than the staff ID cards. The "opt in" and "opt out" facility on the phone book is the method by which an individual can give or withdraw their consent. These procedures are in line with GDPR.