

Process Id# :: 0007
Process Name :: Staff Photographic Identification & Photo Policy
Date Last Updated :: 4/7/2019

Description ::

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 Data Controller for the photographic images is the National Shared Services Office.

Purpose of Processing ::

This requirement is to fulfil the its responsibilities, 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. If a staff member wishes, it will also be available for use on the internal phonebook through an “opt in” facility. The placing of the photograph on the phone book is entirely voluntary. Consent may be withdrawn at any time.

The NSSO has undergone a lot of growth and change in recent years with significant staff mobility. As a way of bringing people closer together and enabling people to put faces to names, it is intended that the phonebook/organisation chart be updated to enable staff ID photographs to be displayed along with the previously available information. The placing of your photograph on the phone book is entirely voluntary. You may withdraw your consent at any time.

Text re <https://whodoeswhat.gov.ie/root/nssso/> for senior staff.

Access & Control ::

The issuing of these cards on which the photographic ID is printed is dealt with by a small dedicated Unit in HR 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 HR

Staff using the ‘Lync’ system and choose to replace the standard grey/white peg icon with an photograph of their choice. By placing a photograph here staff should be aware the photograph will sync with Outlook and present to others on the same platform. 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.

Principles of 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, HR will delete their photo. The NSSO will put in place arrangements for the updating of staff photographs.
- All queries regarding the use of the photographic image should be directed to the HR Division at the following email address xxxx@nssso.gov.ie

Photographs taken at NSSO events ::

This requirement is to fulfil

Text required from Sinead / Communications team for their policy on use of staff images in the shared scoop, at conferences etc. Text needed to square off that staff have been

Frequently Asked Questions ::

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

No, this process is entirely voluntary.

I do not want my photo on the phonebook anymore, what now?

You can revoke your consent at any time and your photo will no longer appear on the phonebook. Just contact xxxx@nssso.gov.ie

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 platforms (DPER, D/Finance, D/RCD) will have access to photographs you choose to use in the Lync/Outlook client.

Where is my 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 xxxx@nssso.gov.ie.
- Arrange an appointment with HR to have your picture retaken. You can do this by emailing your request to: xxxx@nssso.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 by Services, Health and Safety Division, 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 server, and automatically removed from the phonebook.

How long is my photo held for?

Your photo is only held for the duration of your employment with the NSSO. Once you leave, your photo is deleted.

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 and may result in disciplinary procedures.

The Department's 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 Department'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.