Public Photography Policy

1   Introduction

This policy is intended to support the Chester Beatty (CB) generated photography of the visiting public as they attend Chester Beatty events and visit the museum site. This policy supports the photography of children and adults, in both private and public events, within the Chester Beatty site and at remote locations when the primary event is sponsored by the museum. This policy is intended to aid the museum in its compliance with the European Union General Data Protection Regulation (GDPR) and to support the museum's Child Protection and Welfare Policy.

Museum photography containing the event participants and the general public is of particular importance for the promotion of the museum and the generation of externally facing documentation and display materials. While the GDPR regulation complicates this activity, it is recognised that the value of the photographic output merits the additional work necessary to achieve compliance.

2   Scope

This policy will cover the photography of all people, excluding museum staff and volunteers, who are photographed in the museum site or at an off-site museum sponsored event. This policy will:

- Cover children, adults and vulnerable adults.

- Support singular or group photography.

- Cover museum hosted public and private events with the exclusion of externally hired non-museum events.

3   Aims and Objectives

The aim of this document is to support the implementation of a functional workflow for photography of the general public for the purpose of communications and marketing. Additionally, this policy will:

- Support compliance with the General Data Privacy Regulation.

- Support specific permissions documentation for the photography of children and vulnerable adults.

- Provide guidance for the lifecycle management of the digital image assets under the Chester Beatty Records Management Policy.

4 General Policy

To this end:

- Ensure that all photography of all non-staff, that is retained for use, will include a completed photographic permission form.
    - Event managers will be responsible for the collections of photographic permission forms.
    - Event managers will support the event photographers ensuring any event participants wishing to be excluded from photography are not included.
    - General CB events may have the internal CB photographer assume responsibility for the management of photographic permissions as necessary.
- Ensure that all events will receive a unique Chester Beatty Event Number and this number will be noted on all permission forms.
    - Event managers will be responsible for the assignment of an event number.
- Photographic permissions forms will be stored in a single locked location with access managed by the existing CB key management system.
    - Digital staff will have keyed access to the storage system.
    - Photographic permissions will be organised by event number.
- All event participants will be added to a searchable database that will cross reference the unique Chester Beatty event number.
    - Database will be permissions managed and only accessible by appropriate staff members.
- To address any takedown requests all images from impacted events (any event that includes the requestor) will be permanently deleted.
    - Image removal will occur at an event level not at an image level to ensure the complete deletion of personal data as required by GDPR.
    - Image deletion will be noted in the attendee database.

4.1 Data Lifetime

The photographic and permissions assets will be added to the Chester Beatty Data Retention and Disposal Schedule and will be lifecycle managed by the Records Manager.

4.2 Metadata Mark-up

With the use of an external database to manage attendee names and event numbers, there will be no personal information added to the image-wise metadata or to the image metadata associated with the Digital Asset Management interface (Extensis Portfolio).

All images that include members of the public will have the CB event number added to the image metadata to aid in discovery for GDPR takedown requests and to support lifecycle management tasks.

5   For Further Information please see:

CB Child Protection and Welfare Policy

CB Data Protection Policy

CB Records Management Policy

6   Approval/Revision History

This Public Photography Policy is version 1.1, formally approved by the Board of Trustees on 13 December 2019. This policy will be reviewed on an annual basis by the Head of Digital and a full revision will take place every five years.