

Legitimate Interests Assessment for the processing of images

Purpose

- 2020 vision aims to collect a bank of around 1000 images to represent the lived experience of Bishop's Waltham in 2020, which will include both environment and local people. The images will become a resource for social historians to use now and in the future as a means of identifying and comparing changes in many aspects of local life.
- Bishop's Waltham Museum Trust (Registered Charity no 290709) will benefit, as the images will join the existing photographic archive dating from 1890 to the present. They will be freely available thereafter to researchers and for most purposes such as exhibitions, books, and the Museum's website. There is a possibility that a few images might be used by Bishop's Waltham 2020 Vision or Bishop's Waltham Museum Trust for fund-raising purposes (e.g. Christmas cards, calendars, postcards) after consent had been obtained from the photographers.
- The benefits of the project are publicly important in recording the history of Bishop's Waltham, and thus community continuity and cohesion, for future generations.
- This will be the first systematic attempt to capture the essence of Bishop's Waltham since the 1980s, which has left a chronological gap in the John Bosworth Collection of Bishop's Waltham Museum Trust.
- So far as we are aware, use of the data would not be unethical or unlawful in any way provided guidelines are followed by photographers and the Bishop's Waltham 2020 Vision group. Any material which would be unethical or unlawful will be removed, or where consent has not been given in cases where the curator considers it should have been obtained. 2020 Vision is following the terms of the Data Processing Act 2018.

Necessity

- Storing of images in the long term is essential to the purpose of the project.
- Initially the images selected will be stored in a secure online folder and within the website catalogue, accessible only by authorised 2020 Vision Team members for the specific purposes of the project. The end date for collecting images is 31 December 2020. As soon as possible after this, the images will be passed on to the BWMT and any unselected images will be deleted.
- This is considered to be the least intrusive way to achieve the project's purpose.

Balancing test between the impact on an individual's rights and legitimate interests.

- The photographer might or might not have any relationship to or with the individual.
- The data might be sensitive and personal, such as revealing the home address of an individual or their sexuality or ethnicity. If such images were to be used, the individual would need to give explicit written consent.
- In less sensitive areas, e.g. showing their interests or club affiliations, in giving verbal consent to the photograph after a suitable explanation, the individual is expecting and agreeing to the image being published on the Bishop's Waltham 2020 Vision website and elsewhere.
- Some people might object or find a photograph intrusive, however they can opt out at an early stage by not consenting to the photograph before or after it is taken, or by contacting



2020 Vision directly. In group situations such as meetings, a notice advising a photographer is present can be displayed.

- Children's images will be processed. The possible impact on a child is the biggest concern of the 2020 Vision project. In a relatively small town, children and vulnerable adults can be identified far more easily than in a city area.
- Looked-after children, people with learning and physical disabilities and the frail elderly are the most vulnerable individuals in Bishop's Waltham. Special care with strict adherence to the guidelines will be essential to avoid the identification of individuals in circumstances which might facilitate abuse of any kind. However, there will be a place for carefully planned images of these individuals as part of the lived experience of the locality.
- Specific guidelines to photographers will be provided, including discouraging using children/vulnerable adults in the foreground without a good reason; using group rather than individual photographs; ensuring children/vulnerable adults are not identified by name or home address; avoiding close-ups, any undressed or revealing images; and that parents/individuals have consented in writing to the photograph/s being displayed and stored for the project before the image is taken. Images will be examined by the curator and any images which may be misused, are unethical or unlawful, or does not have a necessary consent will be deleted immediately.
- Physical safeguards for the photographer and child or vulnerable adult include encouraging the use of known adults/children to photograph a child or vulnerable adult and having a third-party present.

