

From Real Citizens to Placeholders: How GDPR Turned Public-Sector Images of Citizens and Municipal Space into Visual Proxies

Extended Abstract

The General Data Protection Regulation (GDPR) has typically been examined as a legal regime governing privacy (Lyon, 2001), datafication (Bennett & Raab, 2006), and the governance of personal information (Regan, 1995; Schreurs et al, 2008; Solove, 2006). Yet the implications of these regimes for visual culture, specifically for the public-sectors visual representation, remain underexplored (Knudsen & Almlund, 2021). This paper reconceptualises GDPR as a mode of *visual governance* that reorganises how public-sector images function as placeholders for people, places, and institutional relations.

Drawing on a mixed-methods study of 5,057 visual units across four Swedish municipalities' imagery on social media channels and internal image archives and through interviews conducted with communication professionals, this paper argues that GDPR does not merely regulate personal data and privacy. Rather, it also transforms visual representation into a regime of *proxy production*, in which images substitute for embodied civic presence and produce anonymised, interchangeable depictions of municipal spaces under infrastructural and legal constraints.

This shift aligns with the broader conference theme, which emphasises how technical and legal systems condition the spatiality of images, generate proxies, and allow them to circulate as substitutes detached from the settings they claim to represent. The findings demonstrate how these transformations unfold within everyday institutional communication, where images must simultaneously fulfil administrative functions, perform civic representation, and satisfy legal compliance. Under these conditions, the photographic image becomes less an index of lived municipal life and more an artefact of infrastructural and regulatory mediation.

Accordingly, the study theorises GDPR-compliant municipal imagery as a category of *regulated proxies* which are designed primarily to meet communicative and legal obligations and function as proxies for a broader spatial and institutional shift in the representation of citizens. Rather than treating anonymisation as a photo-technical strategy, communication professionals increasingly use stock imagery and the archival category "non-identifiable person" as a systematic placeholder. This category becomes a token standing in for images of real citizens and without the specificity that would situate them within a particular local community. Hence, deferral of specificity transforms depicted individuals into placeholders, enabling institutional communication to continue while detaching images from embodied locality.

Methods and materials

The analysis draws on the dataset of municipal 5,057 images and metadata coded between two matched periods: the year before GDPR enforcement (2017–2018) and a comparable post-enforcement period (2022–2023). Quantitative coding captured authorship, identifiability, anonymization techniques, legal consents, and metadata completeness. Qualitative strategic interviews with communication staff at the municipalities provided insight into institutional workflow, infrastructural constraints, and the interpretive strategies of the GDPR-law.

Key findings

Three empirical findings structure the argument:

1. The rise of “non-identifiable” placeholders

Across municipalities, the most common legal designation for visual units of people was “non-identifiable,” a category strategically used to bypass consent requirements while maintaining visual output. This designation was not primarily an assessment of what viewers could recognize, it was an administrative placeholder in the archival system that reorganized stock photo material as well as anonymized photographic material. The professional staff at the municipalities had increasingly started to photograph individuals from behind, at long distance, with shallow focus, or with partial details, photographic techniques that reduce the imagery's spatial specificity and turn embodied subjects into generic figures, expressing less citizenry and more of the municipal work procedures constrained by GDPR.

2. Substitution logics and proxy ecologies

Post-GDPR, municipalities increased their use of graphics and user-generated nature or environment pictures photographed by local citizens, forms of visual substitution that dissembled the visual representation. Explaining this practise the communication staff said that instead of photographing municipal parks or squares with humans, schools with kids, or official community events, they rather used stock images or graphics as a risk-free, de-territorialised depiction in public information. These interchangeable proxies were, in fact, used as tokens circulating across the municipality's social media channels without grounding them in what they ostensibly were to represent.

3. Infrastructural imaging regimes

Finally, municipalities with GDPR-integrated archival image systems maintained higher levels of identifiable imagery because of digital consent tools (e.g., linked QR-code documentation) which enabled easier compliant workflows. However, municipalities without such systems adopted minimalist practises and had removed or even deleted entire image archives of real events and people. Thus, imaging capacity had become contingent on infrastructural integration, revealing a hidden role of software architectures in determining public visibility. Here, GDPR functions not only as law but as a technical apparatus that reorganises how municipal space becomes legible through images.

Theoretical contribution

Building on Flusser's (2000) account of images as apparatus-generated abstractions, this study suggests that laws and digital archival systems have accelerated the transformation of public-sector images into operational visual placeholders. Images in public sector seems to no longer to document municipal events or lived life. Instead, they have become an administrative fiction of visibility shaped by legal and technical constraints where consent have developed into a management of metadata in the digital archival architecture. In this regime these interchangeable visual proxies replace (1) transparent visibility by regulated opacity (2) and embodied presence with stock imagery proxies (3) and spatial specificity by template-ready representations from user-generated social media imagery.

Through this lens, GDPR-compliant images act as tokens that defer or suppress the local, producing "safe" scenes that satisfy legal form while reducing the expressive capacity of municipal photography. These proxies sustain administrative legibility but impoverish the civic imagination of place.

Conclusion

This paper reframes GDPR's influence on public-sector visual communication as a transformation in the spatial and representational ontology of the photographic image. Municipal imagery becomes a hybrid of legal compliance, infrastructural discipline, and risk-averse substitution of proxy imagery. Rather than disappearing, anonymized people persist as *procedurally sanctioned placeholders*, and the locality of places persists as *interchangeable visual templates*. As such, these findings highlight how regulatory policies can silently reshape what counts as a visual representation of place and people in public life. This conceptual shift has implications for further visual studies, media theory, and debates on the politic of public-sector visual transparency and representation.

Keywords: GDPR; visual governance; placeholders; proxy images; public-sector communication

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