

GDPR and safeguarding Policy and procedures

Statement of intent

Lawrence Godfrey Photography is fully aware of the sensitive information it holds and will always work to ensure the safety of the images and information held. We will only hold necessary information and will only hold it for as long as necessary. Lawrence Godfrey Photography is aware of the importance of keeping children and the image of children safe. Lawrence Godfrey Photography endeavour to make their process as clear and transparent as possible. Lawrence Godfrey Photography fully subscribe to the introduction of GDPR in May 2018 and are committed to preserving the confidentiality and integrity of our business and will use the GDPR framework to incorporate our privacy and safeguarding procedures to ensure we operate to reduce any information related risks and to assure our customers that protecting their personal and sensitive information is paramount to our operation.

Lawrence Godfrey Photography will ensure that:

- All staff are aware of data protection policy and their procedures
- All staff adhere to the individual schools safeguarding procedure when conducting work within the school
- All companies used by Lawrence Godfrey Photography will be named in this policy and copies of their privacy policy kept on file
- All staff will complete ICO online training
- All staff training is updated when necessary Risk assessments are completed ICO membership is updated annually
- Full transparency for any information we hold
- DBS checks are procedure for photographers

Procedures

School Photographs

Staff will adhere to school safeguarding policies on visitor when onsite. They will have their DBS number available if requested.

Childrens information from the schools using SIMs system is held for no more than 3 months after the shoot. The information is only used by the school for their records or for Lawrence Godfrey Photography to cross reference proof cards at the school request.

Photos held by us are on encrypted drives for security. Photos are backed up for a maximum of 2 years before being overwritten.

Any photos being transfers to our processors or schools are done so using encrypted applications only. Our processors have their own GDPR policy which is risk assessed

No image is used for marketing/advertising without permission from the school or organisation

Under no circumstance is a child's personal information shared with any other organisation except the originator

Copies of proof cards can **only** be requested from the school to with their permission.

It is the schools responsibility to ensure all children are presented for their photographs at the time of the shoot.

When group photos are taken it is the responsibility of the school to ensure any child with safeguarding concerns are not present for the photo. If the school require separate photos for these individuals Lawrence Godfrey Photography will take every precaution to minimise issues but acknowledge this is at the schools own safeguarding risk.

Accounts

These are kept electronically using FreeAgent system

Using WeTransfer

Lawrence Godfrey Photography use Wettransfer to send and receive files to know email addresses. Types of files sent are: proof cards, records files, photos. No useable personal information is sent. Please see below for further information

Procedure for suspected breach

Any suspected breach in these procedures should be made known to Rachael Godfrey as soon as noted or within 72 hours

Rachael Godfrey will investigate any suspected breach and report any issues to the relevant authorities and will record the findings

If the breach is likely to result in high risk to the data subject, Lawrence Godfrey Photography notifies the data subjects affected immediately

Any breach will be immediately re-risk assessed and new procedures put in place where applicable

Clarification of information held with Lawrence Godfrey Photography and their procedures

Schools without Auto Import System (also know as SIMS)

Individual and class photos with school and class names only

The images only are sent to the processor over secure encrypted ftp. (no other information is sent except the image files and the shoot reference)

Proof cards are made up using the images and reference number only, they are posted to the school The school distributes the cards to the children

Parents can order online using the Sherwood secure shopping site (see their policy attached) Parents can order using the online system.

Orders placed before the deadline date are delivered direct to the school unless directed otherwise by the parents.

Parents order receipts are emailed to us and we hold these email for maximum of 5 years.

Schools using Auto Import System (also know as SIMS)

Individual and class photos

Spreadsheet provided by school containing Childs name, ID, school and class names for school record purposes.

Lawrence Godfrey Photography use this information to create QR codes which have the child's name and class on them.

These are given to the individual children on the day of the shoot, they hand them to the photographer who scans the QR before taking the photo.

Once the photos are back in the office they are downloaded onto our software and the information can be used to create record files for the school.

The record files containing thumbnail size photo of child and embedded information - name, class, ID and school are sent to the school via 'wetransfer' password protected and deleted after 3 months.

At this point we no longer hold any information provided on the spreadsheet.

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Childrens University

Individual photos - kept securely for up to 2 years before being overwritten

Childs name and school

The child gives a member of Lawrence Godfrey Photography his/her name and school at the time of the shoot This is verified against the list provided by Childrens University and the child is allocated a reference number The reference number is linked to the childs name so that every individual can be identified by his/her school The images are renamed with the Childs reference number and sent to the processor over secure encrypted ftp. (no other information is sent except the image files and the coded shoot reference e.g CHU18)

Proof cards are made up using the images and reference number only, they are returned to Lawrence Godfrey Photography

The proof cards are batched into school groups using the Lawrence Godfrey Photography reference numbers and Childrens University spreadsheet, these are posted or delivered to the schools, any individuals not affiliated with a school will have theirs sent to them via wetransfer using the information provided by Childrens University

Childs name and school with file number is kept on separate paper file for reference only - kept securely for 1 year.

Parents order the photos using the online order system through Sherwood Labs our processors (see their GDPR policy below)

Clarification of information held with Sherwood Laboratories

Individual and group photos

Schools address and contact details to enable them to send the photos to the correct address

Parents who use the online ordering system will be asked for their name and address and email, these are used for the ordering reference - please see processors own policy below

Future aims

To continue updating policy, training and training and procedures when relevant

To investigate ways to reduce the amount of data necessary to fulfil job requirements

This policy was adopted by Lawrence Godfrey Photography on March 2nd 2018

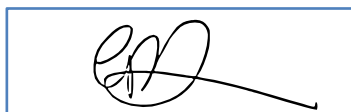
- updated August 24th 2022

Latest date to be reviewed September 2nd 2023

Signed by partners

Rachael Godfrey

Geoff Lawrence



Certificate

Organisation Name:

Lawrence Godfrey Photography

Reference number:

ZA343116

Tier:

Tier 1

Start date:

17 April 2018

End date:

16 April 2023

Data Protection Officer

Data protection policy in accordance with the EU General Data Protection Regulation (GDPR)

Data protection policy

Goal of the data protection policy

The goal of our data protection policy is to depict the legal data protection aspects in one summarising document. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of commissioned processing. This is not only to ensure compliance with the General Data Protection Regulation (GDPR) but also to provide proof of compliance.

Preamble

Sherwood Laboratories Ltd provides a schools processing service to scholastic photography companies, we have and always have been compliant and well within the current and most up to date regulations. Your data is treated with security at an optimum level, running through many security checks and systems. We are committed to continuous improvement for any upcoming changes

Security policy and responsibilities in the company

- Your data (including photographs) is stored on our in house server which is located within our secure laboratory; this includes grilles to all doors and windows, electronic fob entry and is monitored through Redcare's 24/7 alarm system.
- Your names, class details and addresses are stored within the same server located as above.
- Access to your personal data is protected and only available to key staff members.
- Sherwood takes privacy seriously and will only use personal information to administer our customer's accounts and provide the products and services they have requested.
- Hard copies of all sensitive data are stored securely within the laboratory and shredded after use.
- Servers containing links between photographs and personal details are only available and accessible to key members of staff, any links are then digitally disposed accordingly.
- No payment details are stored. All information is handled through the client's merchant.
- Our encryption system is HTML Guardian 7 which encrypts the online ordering service.
- All data, including photographs, is kept for up to 3 years.
- Only key members of staff have access to your information within the laboratory.
- All computer hardware is disposed of using the standard regulation ourselves
- We're committed to continuous improvement of a data protection management system
- Training, sensitisation and obligation of the employees to comply with the currently regulations.
- We conduct routine internal and external inspections.

Privacy statement We Transfer

<https://wetransfer.com/legal/privacy>

Privacy Policy for FileZilla

<https://filezilla-project.org/privacy.php>