



## **Schools Photography Policy**

Fitzgeralds is contracted by most of the Bailiwick's schools and pre-schools to photograph their pupils on an annual basis.

Fitzgeralds sends a letter each year to the school/pre-school (**school**) and asks for a signed copy to be returned prior to any photography being undertaken. This letter confirms the type of photography which will be undertaken throughout the year e.g.: individuals, groups/classes, website photography or staff photographs. The letter will also state that by signing a copy, the school confirm they have sought parental/guardian (**parent{s}**) permission for each pupil to have their photograph taken and for it to be uploaded to our secure ordering system. Any pupil without these permissions will not attend the photography session. Fitzgeralds is unable to take several images of the same group photograph to include some children and not others.

Fitzgeralds asks for the following information prior to each child to be photographed

- Name
- Class Name

This information is used to create an individual QR code for each pupil. When they have their photograph taken, the QR code is tagged to each image so that the photograph is identifiable.

The tagged images are used to create a unique password which is only given to parents with permission from either the parent or school. Fitzgeralds will not give out passwords to anyone else. Each parent can then log in to our hosted secure server (Netlife) in order to view and place orders for photographs or digital images.

If requested, Fitzgeralds will also supply all tagged images through the SIMS Management Information System for the school's internal use.

### **How information about the school will be used and stored**

Fitzgeralds may hold the following information about the school

- Contact name
- School Address
- School Telephone Number
- School Email Address
- Teachers' names (in order to identify each class)

This information is stored on our database in case we need to contact the school regarding their booking. On a rolling programme, we will delete the data seven years after the last transaction with Fitzgeralds.



## **How information about pupils and parents will be held and stored**

### **Internally at Fitzgeralds**

- The child's information is only used to create the QR code as mentioned above.
- Fitzgeralds does **NOT** and will **NOT** use any pupil's image for marketing or promotional purposes.
- Digital files may be purchased of individual images. Fitzgeralds will **NOT** sell digital images of groups, classes or teams.
- All images are stored on a secure server held at Fitzgeralds. Fitzgeralds operates a Firewall and Sophos Protection which is maintained by Alternative Solutions Ltd. Any SSL certificates are maintained as necessary.
- All images and orders are processed through an internal image management system and may be held for a period of ten years in case of re-orders. After this time period, the images and orders may be deleted. Please note that images may be deleted prior to ten years due to technology and system space.

### **Externally at Netlife**

Fitzgeralds uses an external company called Netlife to enable parents to view their child's images and place orders securely. Netlife is a Norwegian based company who are fully compliant with all EU directives and their privacy policy may be found on their website. They are used by the majority of schools' photographers in the UK, Channel Islands and across Europe.

- Netlife will request and hold the following information when placing an order.
  - Name
  - Address
  - Email
  - Card Payment Details
- This information is stored on their secure servers. 18 months after the last login to an account, all information is automatically deleted from their system.
- Parents are able to download a copy of all data connected to their user at any time by clicking 'Download information'. A zip-file will be downloaded to their computer.
- Parents have the right to delete their account on Netlife. Their account will be instantly quarantined, and the account will be permanently deleted after 30 days. Deleting their account will delete their user and their connection to any picture sets connected to their account including their contact information from the Netlife servers.
  - While their account is in quarantine waiting for deletion they have the opportunity to reactivate their account by logging in again. If they do so their account will be completely restored.



## **Liability and Complaints**

- Parents may select to either collect their order directly from Fitzgeralds, returned to school (within a certain time period) or have it posted to them. Our liability for their order ceases upon collection, delivery to school or once accepted by Guernsey Post. Should they wish to track their order, they may request to have it sent by either recorded or special delivery postage.
- Should they choose to collect their order from Fitzgeralds, we will make repeated attempts to contact them. If the order has not been collected within a period of one year, it may be destroyed unless an agreement has been made with them.
- Any questions about their order must be made within 3 days of receiving their order.
- Should schools wish to receive a copy of the pupil images for their own internal purposes including SIMS, Fitzgeralds' liability ceases once the digital files have been delivered.

## **Privacy Policy**

- We will not use parents' information for the purposes of marketing, nor will we share their information with other parties (unless we have specific prior agreement).
- Any photographs which are printed in error or damaged in the laboratory will be securely shredded.
- In order to take advantage of some of our services, parents may need to supply us with the personal details of a third party, for example, name and address if they wish us to send them prints directly. We will not use this information for anything other than providing the service for which the information was supplied.
- We will not disclose any personally identifiable information without permission unless we are legally required to do so for example, pursuant to a court order or for the purposes of prevention of crime or fraud.

## **Payment**

- Orders may be paid in person at our offices via cash, cheque, credit/debit card or BACS. Cheques are kept for a maximum of one week in a lockable drawer after which they are paid into our nominated bank account. Once received by our bank account, our liability ceases and if parents wish to review their privacy policy, you can see it at their website (Natwest International). Likewise, should parents choose to make a BACS payment, Fitzgeralds will not receive any of their personal information other than the name of the account from which the payment was made, and any reference supplied.
- Credit and Debit cards are processed in-store through our physical WorldPay terminal. The merchant copy of the credit card slip is kept in a lockable drawer until it is reconciled the next working day. Then it is attached to the relevant report for that day and stored for a period not exceeding seven years.



- If payment is made over the telephone by card, the details will be input directly into a secure online card system called Sagepay which encrypts all information so that it cannot be intercepted. Once processed, Fitzgeralds has limited access to the data entered on the payment gateway site for the purpose of amending a transaction if required. No card details are stored on paper or electronically. Fitzgeralds does not accept card details by email and should a client send them to us by email, the email will immediately be deleted from our system.
- Payments made through the Netlife system are taken through Sagepay or Paypal which encrypts all information so that it cannot be intercepted. Once processed Fitzgeralds has limited access to the data entered on the payment gateway site for the purpose of amending a transaction if required.

### **Breaches in Security**

Should a breach occur, the following protocol will be adhered to:

- Identification of breach
  - What has happened?
  - When did it happen?
  - Who is affected?
- The breach will be immediately reported to John Fitzgerald (Managing Director) or Emma Hodge (Office Manager) once it has been identified.
- They will then conduct an internal investigation to discover how serious the breach is. Depending upon their findings:
  - The breach will be rectified, and procedures put into place to ensure it does not happen again.
  - If the breach is considered to be severe ie: results in the high risk to the rights and freedoms of an individual, it will be reported to the Guernsey Data Commissioner and relevant school within a timescale of no more than 72 hours after the initial breach was reported.

Our full privacy policy can be viewed at [www.fitzlab.com](http://www.fitzlab.com).