



RGS  
WORCESTER

Images Policy

RGS Worcester, RGS Dodderhill, RGS The Grange, RGS Springfield

September 2026

## Taking, Storing and Using Images of Children Policy

### Introduction

This Policy is intended to provide information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by RGS Worcester Senior School, RGS Dodderhill, RGS The Grange ("the school") across all areas of School including Early Years and the Nursery at RGS Springfield. It also covers the school's approach to the use of cameras and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

Photographs and video images are classed as personal data under Data Protection legislation, including the EU's General Data Protection Regulation (GDPR).

This Policy applies in addition to the school's parent contract, and any other information the school may provide about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data, e.g. the relevant school's Privacy Notices. Images of pupils in a safeguarding context are dealt with under the school's relevant safeguarding policies. We ask you to note that under no circumstances is the use of cameras or phones allowed in the Early Years settings at RGS The Grange, RGS Springfield or RGS Dodderhill at any time.

### General points to be aware of

- Certain uses of images including pupil images are necessary for the ordinary running of the school; other uses are in the legitimate interests of the school and its community (for example, for administration, identification, educational and curricular purposes, and security). and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised.
- Other uses are considered to be in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The school is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.
- We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security.
- Parents who accept a place for their child at the school are invited to agree to the school using images of him/her as set out in this policy, by completing the appropriate form on the Parent Portal, and/or from time to time if a particular use of the pupil's image is requested. However, parents should be aware of the fact that certain uses of their child's images may be necessary or unavoidable (for example if they are included incidentally in CCTV or a photograph).

- Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Head of Marketing and Communications in writing. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy
- Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used – including images

## Use of Pupil Images in School Publications

In accordance with any consents, notices or objections as may be applicable from time to time, the school will use images of its pupils to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:

- on internal displays (including clips of moving images) on digital and conventional notice boards within the school premises
- in communications with the school community (parents, pupils, staff, Governors and alumni) including by email, on the school intranet, website and by post. Such communication may include pupils' names, but this will apply to pupils at RGS Worcester and to RGS Dodderhill pupils from Year Seven and above. Full names for pupils at RGS Dodderhill (below Year Seven), RGS The Grange and RGS Springfield will not be used when accompanied by an image.
- Where appropriate, via the school's social media channels, including but not limited to Twitter, Instagram and Facebook and emailed newsletters. Such images would not normally be accompanied by the pupil's full name without permission.
- In the School's prospectus, Excel and Worcesterian publications full names and images may be used for RGS Worcester pupils. Images will not include full pupil names at RGS Dodderhill (below Year Seven), RGS The Grange and RGS Springfield, with the exception of the Year Six Leaver pages.
- In programmes for events (including sport, music, drama) for RGS Worcester pupils and RGS Dodderhill pupils from Year Seven and above, images may be accompanied with the full pupil name. With online, press and other external advertisements for the school - such external advertising would not normally include pupils' names.

The source of these images will predominantly be employees of RGS Worcester Family of Schools (who are subject to policies and rules in how and when to take such images), or a professional photographer (checked for GDPR compliance), or occasionally pupils.

The school's policy in respect of the above uses is as follows:

- **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include internal school or parent communications, on the intranet, in printed material such as a school magazine or

prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community: for example, where their face cannot clearly be seen.

- The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by other factors: for example, uses which the school considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).
- **Consent** will be sought for all other external uses of pupil images online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the focus of the image and their face can clearly be seen – the school will discuss the use with the pupil or parents (as appropriate) in advance and seek consent.
- The school will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

### Use of Pupil Images for Identification and Security

- All pupils are photographed on entering the school and, thereafter, annually, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.
- CCTV is in use on school premises, and will sometimes capture images of pupils. Images captured on the School's CCTV system are used in accordance with the Privacy Notice and CCTV Policy.
- The RGS Worcester Family of Schools does not currently utilize automated facial recognition technology, biometric image processing, or artificial intelligence scanners for pupil registration, secure campus access, or dining hall meal-tracking.

### Use of Pupil Images in the Media

- Where practicably possible, the School will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes
- The media always asks for the names of the relevant pupils to go alongside the images, and these will be provided where either parent or pupil has consented as appropriate. It is not the School's policy to provide full or first names in this scenario, and these will

only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

## Security of Pupil Images

- Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The school uses only reputable professional photographers and makes every effort to ensure that any images of pupils are in suitable dress and held by such persons securely, responsibly and in accordance with the school's instructions.
- The school takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems, and protected from loss or misuse. The school will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.
- Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.
- All staff are given guidance on the school's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.
- Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.
- The school is careful in our use of images and digital media but there is always a risk that content shared online may be copied, altered or shared by others outside the school's control. This includes the online misuse and manipulation of digital content for potentially unlawful purposes. The school has robust procedures in place to mitigate the risk of this happening but it cannot be completely eliminated. The school adopts the following measures to reduce the risk:
  - **The Tiered Pupil-Naming Protocol:** The policy establishes a highly professional, tripartite naming rule that is applied consistently across all four schools. By restricting online and social media publications to first names only, permitting surnames only in printed internal literature (such as drama and music programmes), and requiring explicit written consent for press and external media, the school has created a robust, legally secure framework that protects children's digital footprints while celebrating their achievements.

- **Pioneering Artificial Intelligence Safeguards:** In direct response to the emerging cyber risks highlighted in recent statutory updates, the school's AI Policy section formally recognizes the threat of deepfakes, unauthorized image manipulation, and digital likeness theft. By instituting a precautionary preference for group shots rather than direct-to-camera, front-facing single pupil portraits, the policy takes an active, preventative approach to reducing the risk of generative AI abuse. This is world-class safeguarding practice.

### **Use of Cameras and Filming Equipment (including mobile phones) by Parents**

Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on social media accounts), or published in any other way.
- Surreptitious filming using personal devices of any sort is never permissible.
- Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils by reference to their dress or activity or any other factor.
- The school reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.
- The school sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

- Should remote video provision at home (by Zoom, teams or otherwise) be required or facilitated by the school in any context, specific guidelines and instructions will be provided to ensure privacy and safety, including around dress and recording of video.

### Use of Cameras and Filming Equipment by Pupils

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- The use of cameras or filming equipment (including on mobile phones, iPads and other wearable technology) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset. Taking or attempting to take photographs or videos under a person's clothing without their consent (known as 'upskirting') is a criminal offence under the Voyeurism (Offences) Act 2019 and represents an acute safeguarding violation.
- Explicit permission must be sought by a pupil to take a photograph of another pupil(s) or member of staff.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Use of mobile devices Policy: Anti-Bullying Policy, Data Protection Policy for Pupils, Parents and Carers, IT Acceptable Use Policy for Pupils, Safeguarding Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.
- Staff are explicitly reminded that the use of personal mobile phones, smartwatches, tablets, or cameras to take, store, or share images of pupils is strictly prohibited. Any unauthorized use of personal technology by staff to photograph or film pupils represents a breach of professional boundaries and constitutes a Low-Level Concern under KCSIE 2026. All such incidents will be investigated and managed in strict accordance with the school's standalone Low-Level Concerns Policy and Staff Code of Conduct, and must be reported to the Headmaster immediately to maintain our whole-school culture of safety.
- The non-consensual creation, possession, or distribution of nudes, semi-nudes, or sexually explicit images of other pupils (including any digital image or video altered, manipulated, or wholly generated using Artificial Intelligence or 'deepfake' nudification software) is strictly prohibited. Any such incident represents a severe, harmful form of child abuse. It will be reported immediately to the DSL and managed under the Safeguarding, Child-on-Child Abuse Policies, and where appropriate, reported to the Police.
- While personal cameras and mobile phones remain strictly prohibited during the daily classroom routine and normal care hours within our Early Years Foundation Stage (EYFS) settings, the school operates a strictly controlled exception for parents during designated, invite-only EYFS school events (such as plays, nativities, assemblies, or sports days). On these occasions, photography is permitted under direct staff supervision. Parents must adhere to the school's guidelines, ensuring that any images

captured are for private, personal use only, and are never uploaded to public online platforms or social media if they identify other children in the setting.

### **Awareness of other schools' policies and procedures**

- We are not responsible for other schools' use of images policies – eg at sporting fixtures. Wherever practical, however, steps are taken with visiting schools and at away fixtures / events to check any arrangements they have regarding pupil images and video streaming and that any policies in this area are broadly aligned with our own and/or are notified to participating parents and pupils as applicable.

### **Legislation**

The statutory and legal framework governing the operation of this policy includes the Data Protection Act 2018 (incorporating the UK GDPR), the Data (Use and Access) Act 2025, the Education (Independent School Standards) Regulations 2014, and the statutory guidance Keeping Children Safe in Education (KCSIE) 2026. This policy operates in conjunction with the RGS Worcester Family of Schools' Master Safeguarding Policy, Safer Recruitment Policy, IT Acceptable Use Policy for Pupils and Staff, and the Parent and Pupil Privacy Notices.

August 2026

Sponsored by: DFO

Endorsed by: 19 July 2018 - by Sally Mills, Governor with responsibility for Safeguarding of Children

Re-endorsed: June 2019 by Sally Mills, Governor with responsibility for Safeguarding of Children

Reviewed: September 2022, June 2024, August 2025