



Kuwait National English School CCTV Policy & Guidance

Statement of Intent

At Kuwait National English School, we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to our school and its members.

Important Note: *Only approved persons are allowed to view video surveillance without specific written requests from the courts. This is to ensure the legal privacy rights of our school community (Staff / Students / Parents/ Special Visitors)*

The Purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems at the school and ensure that:

- We comply with the General Data Protection Regulation (GDPR).
- The images that are captured are useable for the purposes we require them for
- We reassure those persons whose images are being captured that the images being handled in accordance with the Data Protection Legislation.

This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that affect their policy

This policy endeavours to be GDPR compliant in all ways.

Definitions

For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct.

- Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.
- Overt surveillance – any use of surveillance for which is applicable an allowable by local law and regulations.
- Covert Surveillance – any use of surveillance which is intentionally not shared with subjects it is recording. Subjects will not be informed of such surveillance.

Kuwait National English School does not condone the use of Covert surveillance when monitoring the school's staff, pupils and / or visitors. Covert surveillance will only be operable in extreme circumstances.

Any Overt surveillance footage will be clearly signposted around the school.

Roles and Responsibilities

- 1) The role of the data protection lead (DPL) includes:
 - Dealing with freedom of information requests and subject access requests (SAR) in line with GDPR and Local legislation.
 - Ensuring that all data controllers at the school handle and process surveillance and CCTV footage in accordance with GDPR legislation.

- Ensuring the surveillance and CCTV footage is obtained in line with legal requirements.
- Ensuring consent is clear, positive and unambiguous. Agreement through silence is not valid and not GDPR compliant. Consent must be given freely.
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls out of its retention period.
- Keeping comprehensive and accurate records of all data processing activities, including surveillance and CCTV footage, detailing the purpose of the activity and making these records public upon request by law enforcement and court order.
- Informing data subjects of how their data captured in surveillance and CCTV footage will be used by the school, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.
- Report to the highest level of the school i.e. School Chairman
- Abiding by confidentiality requirements in relation to the duties undertaken while in the role.
- Monitoring the performance of the school under the GDPR impact assessment.
- Presenting reports regarding data processing at the school to senior leaders and the Governing board.

The School General Director is the data controller. He /She therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations. The General Director deals with the day to day matters relating to data protection and thus for the benefit of this policy will act as the data controller.

Role of data controller involves:

- Processing surveillance and CCTV footage legally and fairly
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- Ensuring that any surveillance and CCTV footage identifying an individual is not kept longer than is necessary.
- Protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.
- Meeting with DPL to decide where CCTV is needed to justify its means.
- Conferring with the DPL with regard to the lawful processing of the surveillance and CCTV footage.
- Reviewing the CCTV Policy to ensure it is compliant with current local regulations.
- Monitoring legislation (GDPR) to ensure the school is using CCTV footage fairly and lawfully.
- Communicating any changes to staff.

Purpose and Justification

1. The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors.
2. Surveillance will be used as a deterrent for violent behaviour and damage to the school.
3. The school will only conduct surveillance as a deterrent and under no circumstances will cameras be present in change rooms or bathrooms or where privacy would rightfully be expected.

Data Protection Principles.

Data collected from CCTV will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Objectives

The surveillance system will be used to:

- Maintain a safe environment
- Ensure the welfare of pupils, staff and visitors
- Deter criminal acts against persons and property
- Assist the police in identifying persons who have committed an offense.
- The surveillance system has been designed for maximum effectiveness and efficiency; however.

CCTV Cameras are in all public spaces, most offices and classrooms and are marked by Signs at all entrances notifying persons entering the building that they will be on CCTV cameras.

Guidance on CCTV within the school:

Kuwait National English School Management is very strict using the surveillance camera system in the school for the specific purpose of safeguarding our students, staff and parents from any incident, verbal, or physical abuse within the school walls.

The school CCTV has a short recording span, which every 6 weeks all data are deleted automatically from its hard disk.

The CCTV is not integrated within the school intranet and servers to remain secure at all time. The CCTV cannot be accessed from outside the school internal network. It has its own network.

Access to the CCTV is only allowed to the upper management team, Safeguarding Team and School Social Workers when accompanied by a SLT member to view any incident that happened within a limited time frame.

CCTV is allowed to be copied or saved, only for the purpose of investigation of a specific incident the incidents that happened can be copied to be used for evidence of a specific incident.



If an incident is needed to be copied, it may be viewed only with a court order from the Police and a specific time, date and place must be specified.

If a parent wishes to have a CCTV copy of an incident to take legal action at the police. He/ She will need to bring a legal request from the police or the Court to be allowed have a copy of the incident.

The CCTV is not being used to monitor any staff or students in school at any time. The CCTV is only used in case of incident that happened in school.

The CCTV is used only by the Upper Management team and Safeguarding Team access and is limited to only areas that are of their concern. School Social Workers are also permitted to view video surveillance with the support of a member of the management team or safeguarding team.

The CCTV full access is only by a senior member of the Management team who is able to view all cameras in the school if needed.

All school entrance gates have signage-notifying people they are on CCTV camera and they are reminded inside the school on all the glass doors with a sticker.