EV-S.0624 CCTV

Policy

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EVEREST SCHOOL





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1. Introduction

Everest School (EV-S) uses video surveillance as an essential tool to ensure the safety of students, staff, visitors, and property. This policy governs the installation and use of surveillance systems in compliance with Moroccan data protection laws, while respecting individual rights and privacy.

It aims to prevent inappropriate behavior, deter criminal acts, and support investigations in the event of incidents, while ensuring a transparent and proportionate use of the equipment. Recordings are securely managed and accessible only to authorized individuals, and clear mechanisms are in place to allow individuals to assert their rights. This approach reflects EV-S's commitment to providing a safe, respectful school environment that complies with legal standards.

2. Objectives of the Video Surveillance Policy

This policy aims to regulate the management, operation, and use of video surveillance (CCTV) systems at Everest School, both inside and outside the premises. These systems, owned by the school and supervised by the management teams, are deployed to enhance security while respecting individuals' rights and privacy.

The specific objectives are as follows:

- To ensure the safety of students, staff, and visitors by preventing bullying, inappropriate behavior, and health and safety risks.
- To protect the school's buildings and property, during and outside school hours, while deterring crimes and antisocial behavior, such as theft and vandalism.
- To promote a safe and peaceful school environment, in compliance with the school's rules, for effective school management.
- To provide evidence in the event of an incident or violation, to support internal or police investigations.
- To assist in identifying and prosecuting offenders, in cooperation with the relevant authorities.

3. Directive on the Use and Placement of Surveillance Systems

a. Scope of Application

Surveillance Camera Use and Management Policy

This policy strictly governs the installation, use, and management of surveillance cameras, as well as the practices of monitoring, recording, and further processing of collected data. The federation ensures full compliance with the guidelines of the Information Commissioner, thus guaranteeing a responsible and ethical use of these systems to preserve the trust and credibility of all concerned parties.

Signage and Transparency

To clearly inform all concerned individuals, warning signs about video surveillance will be



visibly installed at all entrances to the schools. These signs will specify the specific objectives of the surveillance use. Additionally, in areas equipped with cameras, the schools will ensure that additional signs are placed in prominent positions to clearly indicate monitored spaces.

System Planning and Design

The planning and design of the surveillance systems aim to maximize their effectiveness in the monitored areas. However, it is important to note that these systems cannot guarantee exhaustive coverage or detection of all incidents that may occur. Their primary objective is to contribute to overall safety while complying with regulatory frameworks and internal policies of the federation.

• Privacy and Compliance with Applicable Legislation

This policy prohibits any surveillance or camera use based on discriminatory criteria or classifications contrary to equality laws and other relevant legislation, such as race, gender, sexual orientation, national origin, or disability. Furthermore, surveillance in public school areas will be limited to legitimate uses, compatible with respecting individuals' reasonable privacy expectations.

Information collected in violation of this policy, whether intentionally or unintentionally, cannot be used as evidence in disciplinary proceedings against an employee or student.

Compliance and System Management

All surveillance systems, as well as associated equipment, must be used exclusively within the framework defined by this policy. Any non-compliant use may result in sanctions and suspension of the relevant devices.

b. Camera Locations

The implementation of this policy reflects Everest School's commitment to providing a safe, inclusive environment that respects fundamental rights.

Application of the Video Surveillance Policy.

This policy applies to all premises of Everest School, as well as areas specifically identified by staff and students as difficult to monitor, to enhance security. It includes, but is not limited to:

- Entrances and exits: to control access and secure entry points.
- Hallways and common areas: to ensure safety during internal movements.
- Outdoor playgrounds: to monitor outdoor activities.
- Parking areas: to protect vehicles and monitor arrivals and departures.

Areas Excluded from Surveillance

To respect individuals' privacy, certain sensitive areas are not covered by video surveillance, including:

- Classrooms.
- Restrooms.
- Locker rooms.



Camera Placement

Surveillance cameras are strategically installed to capture only relevant images linked to defined security objectives. Their placement is carefully planned to ensure:

- Respect for reasonable privacy expectations.
- · Compliance with applicable legislation.
- Coverage limited to school premises, including both indoor and outdoor spaces.

Access to Information

Staff members are informed about the locations of cameras, except those used for covert operations, which remain confidential.

Objectives of Surveillance and Recording

Video surveillance in public school areas may include, but is not limited to, the following uses: Protection of school buildings and property:

- Perimeter of buildings.
- Entrances and exits.
- Halls, hallways, and specific storage areas.
- Locations of cash registers and goods reception areas.
- The cafeteria.
- Monitoring of access control systems:
- Restricted access areas.
- · Secure entry points

Verification of security alarms:

- Intrusion alarms.
- Exit door controls and exterior alarms.

Video patrols of public spaces:

- Parking areas and circulation zones.
- Traffic control at main gates.

Criminal investigations:

 Surveillance of thefts, burglaries, and acts of vandalism, in cooperation with relevant authorities.

c. Covert Surveillance

Everest School may employ covert surveillance to enhance security while preserving individuals' privacy rights. Below are examples of its application:

Targeted surveillance in sensitive areas



- ✓ Staff-only building entrances: Installing covert cameras to monitor access and prevent intrusions.
- Storage areas: Surveillance of areas where valuable items are stored, such as IT equipment or school supplies.

Monitoring specific behaviors

- ✓ High-risk areas: Covert monitoring of areas identified as susceptible to vandalism or inappropriate behaviors, such as certain areas or secluded corners of playgrounds.
- ✓ Recurring incidents: Temporary covert monitoring in areas where thefts or other issues have been reported.

Securing outdoor areas

- ✓ Parking lots: Using covert cameras to monitor movements in school parking areas.
- ✓ Back doors or isolated perimeters: Surveillance of less-frequented access points to prevent intrusions.

Data protection and confidentiality

Cameras used for covert surveillance are positioned to capture only relevant areas, without encroaching on private spaces such as restrooms or locker rooms.

Classrooms

Covert surveillance may occur in classrooms only under the following circumstances:

- ✓ When there is good reason to suspect that one or more serious illegal or unauthorized actions are taking place.
- ✓ When informing the concerned parties in advance would severely hinder the objective of the recording.

However, it will never be used to observe or evaluate the professional performance of a teacher.

Covert surveillance will cease once the investigation is completed.

4. Operation and Responsibilities

Everest School's video surveillance policy establishes a clear framework for the use and management of surveillance systems within the institution. It defines the rules and procedures necessary to ensure that surveillance equipment operates effectively, securely, and in compliance with legal requirements. This policy also outlines the responsibilities of the parties involved, whether in installation, maintenance, or access to recorded data. It ensures that the use of cameras respects privacy rights while meeting the institution's security needs.

The management, operation, and responsibilities of the video surveillance system are carried out according to the following principles:

- Cameras operate 24/7, except during maintenance.
- Images are monitored only by authorized personnel (administrative team or security).



- Collected data is secured and accessible only when there is a justified need.
- The school principal is responsible for the compliance and proper use of the system.

Responsibilities

The school principal must:

- Ensure that the use of surveillance systems is implemented in accordance with this policy.
- Supervise and coordinate the use of video surveillance for security purposes within the school.
- Ensure that all existing surveillance systems are assessed for compliance with this policy.
- Guarantee that video surveillance complies with the highest standards and protections.
- Review camera locations and be responsible for the dissemination of information or stored recordings in accordance with this policy.
- Keep an access log.
- Ensure that the camera's field of view respects this policy, both internally and externally.
- Consider feedback or complaints from students and staff regarding potential privacy or confidentiality concerns related to camera locations or associated equipment.
- Ensure that all monitored areas do not infringe upon individuals' legitimate enhanced privacy expectations within the institution and that no such infringement is likely to occur.
- Ensure that external cameras are positioned in a non-intrusive manner regarding neighboring.
- Ensure that surveillance tapes are stored in a secure location with access restricted to authorized personnel only.
- Ensure that images recorded on tapes/DVDs/digital recordings are kept for no longer than 31 days, unless required for a criminal investigation, legal proceedings, or another legitimate use approved by the principal.
- Ensure that when using the zoom function of a camera, a second person is present with the operator to guarantee there is no unjustified intrusion into privacy.
- Ensure that the camera control is exclusively used to monitor suspicious behavior, criminal damage, etc., and not to monitor individual characteristics.
- Ensure that camera control does not infringe upon individuals' reasonable expectation of privacy in public spaces.

5. Data Storage

The storage and retention of video surveillance footage are essential to ensuring security while respecting legal requirements and privacy rights. This section outlines the procedures and practices followed by Everest School to ensure that recorded images are securely stored, accessible only when there is a justified need, and destroyed within an appropriate timeframe.

In accordance with current legislation, the images are kept for a determined period, after which they are erased, unless they are required for legal or disciplinary purposes. The goal is to balance the



security of the facilities with the protection of personal information and compliance with privacy standards.

6. Respect for Privacy

Respect for privacy is a fundamental principle in the context of video surveillance, and it is essential to take this into account to ensure surveillance is in line with ethical and legal standards. Here is the importance of this respect in the context of video surveillance:

- Video surveillance will not be used to monitor staff or students in an intrusive manner.
- Signs indicating the presence of cameras are installed in all relevant areas.
- Any request to view recordings must be approved by the director.

7. Sharing and accessing video surveillance data

Anyone can request access to video surveillance recordings concerning them, and this request will be handled in accordance with the General Data Protection Regulation (GDPR). These laws ensure that personal data is collected and used in a legal, transparent, and fair manner. Access requests will be reviewed based on criteria of transparency, legality, and respect for the rights of others, and must be processed within a reasonable timeframe.

Video surveillance recordings can only be shared under specific circumstances and in strict compliance with applicable laws, such as:

- Upon request from judicial or law enforcement authorities.
- For internal security-related investigations.
 Access to the footage is limited to authorized staff members, under the supervision of the school director, who may delegate the management of the video surveillance system.
 The data will not be disclosed to third parties, except for authorized authorities, such as the police. A detailed log will be kept for any release of recordings to third parties, and this log will be available upon request. In the case of a legal request or court order, the disclosure of images must be carried out in compliance with the legal requirements.

8. Formation et Sensibilisation

Training is essential to ensure the proper, ethical, and effective use of video surveillance systems while protecting individuals' rights. It ensures compliance with data protection regulations, raises awareness of privacy rights, teaches the proper use of equipment, and oversees the secure management of collected data. It strengthens users' accountability and helps minimize the risks of errors or abuse.

An appropriate training program includes practical workshops, sessions focused on legal aspects, simulations for incident management, as well as regular evaluations to ensure continuous updates of knowledge. In summary, training is a crucial pillar to enhance security, promote transparency, and build trust in the video surveillance system.