

CCTV Policy

Lycée Français International Georges Pompidou

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1. Introduction

The use of CCTV at the Lycée Français International Georges Pompidou (hereinafter referred to as “LFIGP” or “the School”) is implemented in accordance with the applicable Laws, regulations and regulatory requirements of the United Arab Emirates and the relevant authorities in Dubai (KHDA). The LFIGP is committed to complying with the UAE Personal Data Protection Law (PDPL) with respect to all personal information it holds, including data collected through closed-circuit television (CCTV) systems. This policy aligns with the School’s broader data protection framework.

LFIGP employs CCTV systems to help maintain a safe and secure environment for students, staff, and visitors, and to safeguard School property. These systems are operational at both the Academic City and Oud Metha campuses.

This policy sets out the principles governing the management, operation, and use of CCTV systems at LFIGP. It ensures compliance with applicable laws while promoting transparency, accountability, and the protection of individual privacy.

2. Purpose of the policy

This policy applies to all students, staff members, contractors, and visitors on LFIGP premises.

The primary purposes of CCTV deployment at LFIGP are to:

- Enhance the safety and personal security of students, staff, parents, and visitors;
- Protect the School's property and facilities from damage or theft;
- Support the prevention, investigation, and resolution of incidents involving misconduct or inappropriate behaviour;
- Assist in identifying individuals involved in events warranting disciplinary or legal review;
- Monitor and manage School facilities more effectively, including incident or accident investigations;
- Provide assistance in emergency response situations.

This list is not exhaustive and other legitimate uses of CCTV may arise.

The use of CCTV at LFIGP is based on the School’s legitimate interest in ensuring the safety of individuals and the security of property.

Cameras are installed within School buildings, across campus grounds, and along perimeters. Their placement is informed by risk assessments conducted with the collaboration of the “*Vie Scolaire*” and School Management.

The CCTV systems are wholly owned and operated by LFIGP. The Head of Operations retains overall responsibility for their management. All image recordings are stored on secure servers located in designated data rooms. Access to these recordings is strictly regulated in accordance with the PDPL.

CCTV cameras operate continuously—24 hours a day, 365 days a year—and do not record sound.

Access to recorded footage is granted only for specific incidents and must follow the procedures outlined herein.

3. CCTV Design and operational use

All external CCTV cameras have been positioned to avoid capturing images of private residences, gardens, or other non-School property. Camera positioning was carefully verified at the time of installation to ensure this.

Cameras are fixed in place and cannot be manually redirected.

Clear signage has been installed in all areas under surveillance, notifying individuals of CCTV coverage in accordance with best practices and legal requirements.

4. Viewing and storage of images

4.1 Authorized Access to Live Footage

The following individuals are permitted to view live CCTV images:

- School Management (School Directors and General Manager);
- Head of Operations
- Operations Assistants
- CPE (Well-Being Coordinators) and AEDs (Well-Being Assistant)
- Permanent members of the School's Security Team (restricted to perimeter and gate cameras)
- Approved external service providers performing on-site maintenance (no remote access permitted)
- Any designated staff member involved in the identification of individuals following an incident.

4.2 Access to Recorded Footage

The following individuals are authorized to access recorded CCTV images:

- School Management;
- Head of Operations and designated Assistants;
- LFIGP Security Coordinator;
- CPEs for each campus (who may formally delegate viewing rights to AEDs in writing).

Where footage is requested for disciplinary or security investigations, viewing must take place in a private setting and involve only those directly participating in the inquiry. Once the investigation concludes, the relevant footage must either be securely archived or permanently deleted.

Footage may only be shared with law enforcement authorities when required for official investigations. All other third-party requests will be denied unless exceptional circumstances apply, and only with the joint approval of the Head of Operations and School Management. Under no circumstances will CCTV recordings be used for commercial purposes or released to the media.

4.3 External Transfers

When footage is transferred to external authorities (e.g., police), it must be provided via a secure physical medium such as a CD or USB stick. Each transfer must be recorded in the CCTV Maintenance Service Report Folder with the following details:

- Date and time of the transfer
- Name and organization of the recipient, including contact information
- Date/time range of the footage and corresponding camera references
- Name and job title of the staff member overseeing the transfer.

All CCTV recordings are considered personal data under the PDPL and are therefore subject to the same legal protections.

5. Data Retention

Recorded CCTV footage is automatically deleted after 45 days unless required for an active investigation, in accordance with LFIGP's Data Protection Policy.

Any footage no longer deemed necessary must be permanently deleted. All physical copies (e.g., photographs, prints, CDs) must be securely destroyed and treated as confidential waste.

6. System Maintenance

The Operations Assistant is responsible for ensuring the ongoing functionality and accuracy of the CCTV system, including image clarity and time-stamp accuracy. All inspections and findings are to be logged in the CCTV Maintenance Service Report Folder.

Both routine and unplanned maintenance activities must be documented. Any substantial changes or additions to the system will trigger a policy review to ensure continued relevance and compliance.

7. Breaches of policy

Any violation of this policy by LFIGP staff will result in a formal investigation and may lead to disciplinary action.

All concerns or complaints regarding the operation or use of the CCTV system must be directed to the Head of Operations.