



Effective From	AY 2024/25 (Fall term)
Compliance From	AY 2025/26 (Fall term)

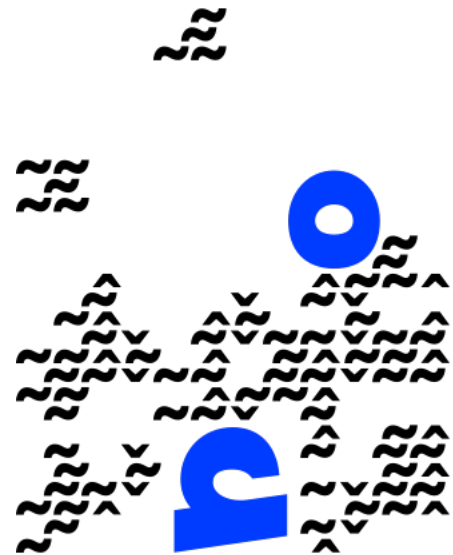
EARLY EDUCATION INSTITUTION **POLICY**

on

SURVEILLANCE

Purpose

This policy sets a clear framework for using surveillance systems and processing personal data at Early Education Institutions (EEl) in line with existing legislation and regulations set by the UAE Monitoring and Control Center (MCC). It establishes the legitimate use of surveillance systems across EEl, standardizes their requirements, and sets clear expectations among all stakeholders (including EEl management and staff, parents, regulators, service providers, etc.).



Definitions

Child	A person under the age of 4 years, as per Federal Decree Law No. (51) of 2022 Regulating Nurseries.
Consent	The authorization given to another party for the processing of personal data provided that this authorization is given in a specific, clear, and unambiguous manner.
Data Controller	The person in charge of deciding how personal information is collected and used at the EEI. The Data Controller is responsible for all decision-making regarding processing and how personal information is used and kept safe.
Data Processor	The person or group that helps the data controller take care of personal information collected at the EEI. They only use and handle personal information in the ways that the data controller tells them to. Processing refers to activities like collecting, storing, organizing, modifying, retrieving, exchanging, sharing or deleting data using electronic tools. They shall always ensure that personal data is kept safe and used properly.
Early Education Institutions (EEIs)	All ADEK-licensed institutions that offer early years service (e.g., nurseries).
Incident(s)	An event or chain of events which has caused or could have caused fatality, injury, illness and/or damage (loss) to assets, entity reputation or third parties.
Premises	The indoor and outdoor space that constitutes the licensed physical space of the EEI.
Surveillance	The action of monitoring individuals or events at the EEI or on vehicles used by the EEI using a surveillance system.
Surveillance System	A system of closed-circuit television (CCTV) cameras that record activity onsite (e.g., a video surveillance system). This definition also includes systems that provide 'live streaming'.
Vehicle	Any vehicle, such as a bus, used by the EEI as part of its transportation service.



Policy

- a) All EEIs shall develop and implement a Surveillance Policy which outlines all processes, procedures, and guidelines, at a minimum, to be followed with regards to:
 1. The legitimate purpose and aim of surveillance
 2. How the surveillance system will keep children safe
 3. Why surveillance is the best way of achieving a child's safety
 4. How all data is processed and stored
 5. What security measures are in place to safeguard against unauthorized access and use
 6. How surveillance and monitoring activities are agreed upon with authorities, parents, and staff
 7. How others (e.g., visitors) are notified that they are being recorded
- b) The EEI Surveillance Policy shall abide by laws, regulations, and policies currently enforced in Abu Dhabi regarding the installation and operation of surveillance systems, as well as the legitimate processing of personal data collected. These include, but are not solely restricted to the following:
 - Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data and any amendments.
 - *Manual of Standards for Surveillance Devices* (MCC, 2023).
- c) The EEI Surveillance Policy shall state that it is fully and transparently shared with, and explained to, parents.
- d) The EEI Surveillance Policy shall state that all staff members are responsible for upholding adopted surveillance and personal data processing practices.

1. General Principles

1.1 Purpose of Personal Data Generated & Collected by Surveillance Systems

EEIs shall install surveillance on EEI premises/in their vehicles and limit access to generated and collected data in line with Article (3) of Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data (see [ADEK EEI Surveillance Policy Guide](#) for examples of illegitimate purposes):

- a) The video surveillance system shall cover EEI indoor (including all spaces used for administration/operations) and outdoor spaces in line with the requirements set by *the Manual of Standards For Surveillance Devices* (MCC, 2023) and any other guidance by the MCC.
- b) The following spaces require privacy and shall not be subject to surveillance:
 - Inside toilets, toilet blocks, or nappy-changing spaces.
 - Spaces where changing of clothes/clothing takes place.
 - Spaces dedicated to breastfeeding and any breastfeeding-support spaces (e.g., lactation spaces).

- c) Personal data generated or collected shall only be used by the EEI to investigate specific incidents that occur onsite or onboard vehicles.

1.2 Service Providers & Technical Specifications

- a) EEIs shall ensure their surveillance system abides by the standards set by the MCC and that they have a valid MCC license and maintenance contract at all times with a service provider who has a valid MCC license for commercial operation.
- b) In coordination with the contracted and licensed service provider, EEIs shall also ensure that the technical specifications and the number of devices used for the EEI surveillance system meet the set standards laid out by the MCC.
- c) Any other arrangement for the installation, maintenance, or operation of the surveillance system, such as contracting unlicensed individuals or organizations is prohibited.

1.3 Consent

- a) EEIs shall ensure that all individuals onsite (including children - represented by their parents) fully consent to the recording of their personal data through the EEI surveillance system.
- b) EEIs shall obtain the explicit consent of those involved in the recording and processing of their personal data in line with the provisions of Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data (see [ADEK EEI Surveillance Policy Guide](#) for more details and a sample consent form).
- c) EEIs shall not conduct any covert surveillance on their own initiative nor at the request of any staff members, parents, or visitors.
- d) EEIs are authorized to refuse admission in the case of parents who do not consent to the recording of their children's personal data through the surveillance system.

1.4 Live Streaming

- a) EEIs that offer a live-streaming service shall, at a minimum, comply with the following:
 - Approval is obtained from both ADEK and the MCC for operating the service onsite and on vehicles.
 - The service shall be mentioned on the EEI's website and marketing channels as well as publicly displayed onsite and on vehicles where it is provided.
 - All staff and volunteers at the EEI have given their consent in writing to being recorded as part of the live-streaming service,
 - All parents wishing to access data generated by the live streaming surveillance system shall seek the necessary approvals from ADEK through the EEI and shall agree in writing to uphold all requirements for personal data

protection in line with Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data.

- Recordings of data generated by the live streaming surveillance system are permitted only in exceptional circumstances, such as to report a major concern to the EEI, ADEK, or other relevant authorities in line with Federal Decree Law No. (34) of 2021 on Countering Rumors and Cybercrimes.
- b) EEIs are authorized to refuse admission in the case of parents who do not consent to the live-streaming service provided by the EEI.

2. Data Processing and Storage

2.1 Roles and Responsibilities

EEIs shall ensure that any personal data from recordings are processed in compliance with the standards laid out by the legislation on personal data (see [Section 1. General Principles](#)) to ensure integrity and prevent any tampering or misuse of personal data stored by any party inside or outside of EEIs. Therefore:

- a) EEIs shall assign a Data Controller who is the sole authority to determine the purposes and means of processing personal data collected. In most cases, this would be the EE Director, unless specified otherwise.
- b) The Data Controller's responsibilities are detailed under the relevant articles of Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data and include, but are not solely restricted to:
- Ensuring compliance with legislation on personal data recording and processing and taking appropriate technical and organizational measures to ensure processing is carried out legitimately.
 - Making decisions about all EEI data processing activities and exercising control of the personal data being processed in line with the provisions of the legislation.
 - Investigating any breach or violation of EEI personal data and report results to the relevant authority.
- c) The Data Controller shall also assign a Data Processor (this would be the contracted licensed service provider) whose role it is to process personal data recorded on their behalf:
- The Data Processor shall only act on the Data Controller's instructions, not on their own or any other party's volition (unless otherwise required by law or court order).
 - The Data Processor shall abide by the conditions and provisions listed under the relevant articles of Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data.

- d) EEIs shall not authorize any staff members apart from the Data Processor to access or process data recorded through their surveillance system.

2.2 Access to Footage and Recordings

EEIs shall restrict access to CCTV footage and recordings as follows:

- a) **Monitoring of CCTV Footage:** EEIs shall have a monitoring and control room for the purpose of monitoring CCTV footage. EEIs shall ensure that only the vendor-appointed CCTV specialist(s) monitor the footage.
- b) **Record Keeping:** A log/record shall be maintained, including the date and time, of all staff members who may have viewed the footage.
- c) **Access Permission for Staff:**
- EE Directors are authorized to permit other staff members to view CCTV footage on a need-basis at the EE Director's discretion.
 - The EE Director can nominate other persons such as the EE Assistant Director, nurse or Health and Safety Officer to access the CCTV footage, with regard to investigating incidents and/or concerns.
- d) **Access Permission for Parents and External Support Individuals:** Parents or external support services personnel, such as specialists who may be supporting children, are strictly prohibited from viewing the footage.
- e) **Access Permission for ADEK Staff:** EEIs shall provide access to CCTV footage and recordings to authorized ADEK personnel upon request.
- f) **Access Permission for Authorized Staff:** EEIs shall grant access to authorized personnel from government entities, such as AD Police, ADPHC, CDA, and DOH.
- g) **Copying and Distribution:** The copying or distribution of CCTV recordings is strictly prohibited and punishable by law, in line with the Federal Decree Law No. (34) of 2021 on Countering Rumors and Cybercrimes.
- h) **Escalation:** Where an incident captured in a CCTV recording requires clarification beyond the EEI scope, the EEI shall immediately notify ADEK in order to deal with the incident.

2.3 Data Storage

EEIs shall meet the requirements for surveillance systems and data storage as laid out in the *Manual of Standards For Surveillance Devices* (MCC, 2023), including:

- a) Ensuring that any monitors enabling surveillance system video data to be viewed are in a secure place on-site with appropriate privacy and only accessible by the EEI's Data Controller and Data Processor.

- b) Maintaining/keeping personal surveillance data recorded:
- For at least 180 days to allow for investigation of any incidents.
 - In a secure place (on- or offsite) away from unauthorized access to minimize the risk of tampering or unlawful processing of the data.

3. Compliance

- 3.1** This policy shall be effective as of the start of the Academic Year 2024/25 (Fall term). EEIs are expected to be fully compliant with this policy by the start of the Academic Year 2025/26 (Fall term).
- 3.2** Failure to comply with this policy shall be subject to legal accountability and the penalties stipulated in accordance with the ADEK’s regulations, policies, and requirements, notwithstanding any other penalties imposed by Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties Law and its amendments or any other relevant law. ADEK reserves the right to intervene if the EEI is found to be in violation of its obligations.

References

- Federal Decree Law No. (31) of 2021 Promulgating the Crimes and Penalties Law and its amendments
- Federal Decree Law No. (34) of 2021 on Countering Rumors and Cybercrimes
- Federal Decree Law No. (45) of 2021 Concerning the Protection of Personal Data
- Federal Decree Law No. (51) of 2022 Regulating Nurseries.
- Monitoring and Control Center (MCC). (2023). *Manual of Standards for Surveillance Devices* (Version 2.0).

Publication

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Department of Education and Knowledge, Abu Dhabi (ADEK)

This policy applies to Early Educational Institutions (EEI) in Abu Dhabi.