



God said, "I have loved you with an everlasting love," Jeremiah 31: 3

Child Safe Digital Environments Policy

Aim

To ensure that all stakeholders are aware of the importance of child safety with regards to digital and online environments in line with the guidelines provided by regulatory authorities and the National Authority.

Throughout this policy the word 'images' will be used to indicate both photos and videos unless explicitly labelled otherwise.

Child Safety Risks

"Documentation of children's learning is a requirement of the Education and Care Services National Regulations (regulation 74, 177(1)(a) and 178(1)(a)). Digital photos and videos have become the most common tools used to document children's learning and engagement, and many providers submit these images to families through a range of applications (often restricted for use by authorised persons such as parents and carers) to allow them to view their child's participation in early learning experiences. This type of communication can and does play a role in engaging families and carers in a child's education and care experiences, particularly where there may be low levels of literacy or English is not a first language.

This specific form of documentation is not a requirement of the NQF, and when used without a targeted purpose, can create increasing expectations to transmit frequent updates in the place of more meaningful documentation. It also can reduce educators' abilities to effectively supervise, interact and engage with children in their learning. In these circumstances, educators may be present with children but not providing adequate supervision or utilising important 'teachable moments' to extend the child's interests, learning and development of skills. More intentional approaches to documentation of children's learning, including ensuring electronic device usage is in line with the National Model Code, can help reduce this risk.

More concerningly, there is a very real risk that persons within a service could use their own personal electronic device to take or record images or videos of children for inappropriate purposes. This risk includes taking and sharing inappropriate or even illegal images, in particular where physical or sexual abuse is occurring to the child, or when sexualised images of the child are produced.

Managing and monitoring what images are being taken and where, or to whom they are being sent, is very difficult when educators and other staff use personal electronic devices while providing education and care. Approved providers are responsible for ensuring that service-issued devices are monitored regularly to assess if appropriate usage of the electronic device is occurring by staff at the service.

The NQF has an explicit focus on considering and supporting each child's dignity and rights. Demonstrating child safe practices in the digital age provides new challenges as well as additional benefits for approved providers, educators and services.

Australia's National Principles for Child Safe Organisations collectively illustrate that a child safe organisation is one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people. Principle 8, which focuses on physical and online environments, promoting safety and wellbeing, and minimising the opportunity for children and young people to be harmed, is particularly relevant to taking images and videos of children."

- National Guidelines – Taking images or videos of children while providing early childhood education and care pages 2-3



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Policy

Photos and videos of children

Taking images:

- Children's images can only be taken on service issued devices, or where that has been express written permission for non-employees to take images (see obtaining authorisations).
- Children's images will only be taken where they serve a purpose within the service and have a clear use in mind.
- The number of images of children that are taken should be considered as to how this respects the rights of the child. Each image that is taken places the child at risk and therefore should be reflected upon as to whether it is necessary, or whether it will enhance documentation. Consider whether the image can be of the equipment, the finished product, the child's hands engaging in play, etc.
- Families will have clear expectations communicated to them during enrolment to support an understanding of their obligations when it comes to taking images of their children on the preschool premises where other children may also be present.
- Visitors to the service will be informed of our policies and procedures around taking images of children and monitored closely to ensure they are following these expectations. Ongoing visitors will be required to complete a Visitor Induction Form to show they understand their responsibilities around child safety.
- Consideration will be taken to the background and content of the images and should not contain any of the following:
 - Children in any state of undress
 - Children in distress or dysregulated
 - Children who are sexualised in any way
 - Children who do not reflect a positive reflection of the preschool philosophy (e.g. children who are unwell, unhygienic, not being appropriately supervised, etc.).
 - Any images that do not respect the rights of the child, for example:
 - Images that allow children to be compared in skills or abilities with others
 - Images that are taken without the child's knowledge
 - Images that are forced or posed with the child (unless it is their choice)
 - Images that identify children where this can place them at risk

Using images:

- Images can only be used in the way that they have been authorised (see obtaining authorisations)
- Any person found to be using images in a way other than how they have been authorised will face consequences. This may include disciplinary action, written warnings, or termination for employees. For families this may include termination of enrolment. For visitors and volunteers this may include removal from the preschool. All instances, depending on the situation, may include legal action and/or reporting to the authorities.
- Visitors will be monitored at all times to ensure they are not working against our expectations.
- Families will be encouraged to share information with the preschool if they are aware of anyone who is using images shared by the preschool for reasons other than they were originally intended, such as capturing images and sharing these on their own accounts or similar means.



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- Any images of children used within the service for displays must be considered as to the impact this could have on these images being captured in the background of other images, and therefore should be considered when permission is granted for visitors/parents to take images of the environment without children present.

Storing images:

- Images will be stored both locally and in cloud-based storage.
- Images stored locally within service issued devices and accessible only to authorised persons within those devices.
- Images stored in cloud-based storage will be expected to only be downloaded or accessed on service-issued devices. This is included in the child safe code of conduct to support employees to follow these guidelines.
- The use of passwords, security software and other means will be employed to protect images stored on service devices and limit security risks from unauthorised persons.
- Systems exist whereby all employees have their own log ins for accounts so that who is accessing stored images when can be monitored.
- When employees resign or are terminated all access to stored preschool images and data will be removed within 24 hours to protect preschool privacy and confidentiality.

Destroying images:

- Images will be destroyed by deleting from the devices/cloud based storage and then deleting from trash to ensure that they have been completely removed.
- When an image is taken on a device other than a service issued one that is not authorised it must be deleted following guidelines to ensure that it is completely removed from the device. Where necessary an internet search must be followed to ensure that this is tailored to the device.
- Where images of children have been printed off they will be destroyed by shredding so that they cannot be found or used by anyone else.
- Images of children will be destroyed within the following time frames:

Type of image (includes both digital and hard copy)	Time frame
Images used for documentation of program (incl daily posts, displays, events)	Once a term
Images used for individual observations	Once a term
Images used for marketing/promotion (incl advertisements, social media, website content etc) - Images of our preschool children are not used on social media.	N/A
Images used for preschool resources (incl handbooks, signage, displays etc)	Indefinitely
Images used for illness/incident/injury	Printed copy only



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	kept in child's file.
Images not used for any purpose (i.e. images taken but not needed for documentation or observations)	Monthly
Images not meeting requirements (i.e. images that were discovered to have content that does not meet requirements outline in 'taking images')	As soon as identified
Images found to have been taken without authorisation or where authorisation has been removed	As soon as identified

Obtaining authorisations for photos and videos of children:

Parents/guardians:

- During enrolment authorisations will be obtained from families for the taking and use of their child's image for any purposes that are required.
- Where an opportunity arises that families have not already been able to authorise, this must be obtained for each child who will be included (e.g. photos taken on an excursion to use on another organisation's website/social media).
- Families will be communicated how images are taken (on service issued devices only), what uses they are taken for, and how they will be stored and destroyed to assist them in considering whether or not to authorise the images.
- Families will also be communicated that they can change or withdraw their authorisation at any time, and the process to take to change their permissions.
- Where a unique situation arises that is outside of the scope of this policy (e.g. a medical professional requests specific images to support diagnosis) then this will be discussed with the family and need express written consent from the family, and professionals involved if appropriate, to support this request. A plan will be developed to support the taking, use, storage and destruction of these images that supports child safety.
- Educators will work closely with families to ensure that they will advocate for the rights of the child when it comes to consent around images and that any instance where a child does not consent then this will override the consent from the family.

Children:

- It will be explained to children how their images are used and they will be reminded they can make choices around the use of their images at all times.
- Children will be taught that they have rights over their image and how this is used through spontaneous and planned interactions and experiences.
- Children will be able to say no to photos being taken if they do not feel comfortable and their consent will be respected.
- An educator will not coerce or pressure a child to have their image taken as this does not respect the rights of the child and also creates situations where child protection matters could come into play, especially where another adult could pressure the child for abuse.



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- Children's verbal and non-verbal communication will be taken as consent for images. For example where a child looks unsure or uncomfortable this could be communicating they are not happy with the image being taken, or do not understand what it is being taken for.
- Individual consent does not need to be obtained for every image, however there should be regular reminders of consent and the rights children have around their images so they feel comfortable to speak up and share their concerns.

Optical surveillance devices:

- SPCP does not use video surveillance devices (such as CCTV) within our environments. If we do commence this we will follow all guidelines and communicate the changes to families, including how footage will be recorded, stored and destroyed.
- We believe that trust between our team is important and with above ratio rostering to ensure that there are always adequate educators on site to support supervision and child safety, we do not feel that this is something we are currently needing to engage with. We feel the addition of CCTV would increase safety risks when it comes to children's images and therefore we do not see the need for it currently.
- We will continue to review and reflect on this in line with our context and current guidelines.

Service issued digital devices:

- Images are only permitted to be taken on service-issued devices in line with the expectations outlined in this policy.
- Service issued devices will have a register of which devices exist, which can access the internet, which can take photos/videos/voice recordings.
- The service register will identify which service issued devices are allocated to which individuals, and devices will be clearly labelled to support consistency of use. The register must contain the following information for each device:
 - Date of supply
 - Type of device
 - Make/model/serial number
 - Declaration device is configured to operate in line with policies and procedures
 - Name and signature of person authorised to supply device (AP or AP delegate)
 - Date supply was revoked (if applicable) and name and signature of person revoking.
- The service issued device register must be kept for at least 3 years from the date on the record and stored in a secure location on the premises.
- Where possible individual accounts and log ins will be created on shared devices to support monitoring and accountability in how devices are used.

Personal devices:

- Definition:
 - Personal devices include the following: phone, ipad, Smartwatch
 - Personal Device means a device that is:
 - owned or controlled by a person; and
 - capable of:
 - capturing an image; or
 - storing or transmitting an image but does not include a Service-Supplied Device or Service-Authorised Device.



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- o Examples
- o A phone, tablet computer, camera or smartwatch is a personal device that is capable of capturing an image. A USB drive, memory card or hard drive is a personal device that is capable of storing or transmitting an image.
- o Smart watches must be capable of taking, displaying, storing or transferring images to be included in this, for example Apple Watches and Samsung Watches.
- Personal devices that meet the criteria outlined above are not permitted to be used, carried, or on the person of any employee while on the floor with the children under general conditions.
- Educators are to place their personal devices in the office during their shift and are permitted to have their personal devices on them during breaks so long as they do not enter spaces children are located.
- Despite the following exemptions to having personal devices within the preschool environment when children are present, the personal devices are under no circumstances to be used to take images or record interactions with children.
- Staff will only be able to have their personal devices within the service environment if they meet the following personal criteria AND have completed an application and been approved by management:
 - o The device is required for medical reasons such as monitoring blood sugar levels
 - o The employee requires the device due a disability such as an essential means of communication
 - o The employee has a family necessity such as having an ill or dying family member they need to be contactable for
- Under specific service criteria a personal device may be required however this should clearly be covered in service policies and procedures and have associated safety systems. These are:
 - o Communication during an emergency such as a serious incident, lock down or other situation where communication needs may escalate or the service lines need to remain open.
 - o Where there has been a service technology failure and communication cannot occur through service issued devices.
 - o There is a local emergency happening where notifications need to be monitored for safety reasons and service-issued devices cannot receive notifications.
- Families and visitors are only able to use their devices to sign in using the QR code if they have a child enrolled at the centre. They will be required to have signed an agreement that they will not take photos while on the premises and can also not use their device while within the gates.
- As visitors are not permitted to be unsupervised with the children, educators will monitor their use of phones and personal devices within the service.
- Where a visitor requires a personal device for work purposes during their visit this will be communicated by a visitor child safety form and monitored by educators in the space.

Children and digital devices:

Education:

- The preschool's curriculum, including planned and spontaneous experiences, resources and learning environments will support children to learn about age-appropriate digital safety.
- Educators will utilise resources such as Playing IT Safe, the eSafety Early Years Program and Be Internet Awesome to support children's skills and knowledge of digital and online safety.
- Educators will balance the use of digital resources with role playing and pretend play resources to support children's education.
- Families will also have information shared with them to support their awareness of child safety in digital and online environments.



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Supervision:

- At all times when children are using digital devices they will be directly supervised.
- If an educator needs to leave an area where children are engaging with digital content they will either have another educator replace them or remove the devices until they can return.
- The reasons for increased supervision include supporting children's play, being available to answer any questions or concerns children may have and identifying any risks and addressing these in a timely manner.

Monitoring of content:

- Any apps or programs downloaded for children's use must be pre-approved and vetted by the Nominated Supervisor before use with children.
- Any apps or programs that can be used without being connected to the internet and therefore limiting the impact of unapproved content such as ads or popups will be prioritised. When in use the device should be put in airplane mode.
- Any websites children will be using, including videos, need to be accessed and checked before they are shared to ensure that they are age appropriate and do not contain any inappropriate content. This includes the whole video being watched as some "child safe" videos have inappropriate content inserted later in the video so it misses detection by the systems implemented by child safe filters.
- Regular checks will be conducted on service-issued devices to ensure that all programs/apps meet service expectations and are appropriate. Where content is identified as not being appropriate it will be deleted and the person who added it will be reminded of service expectations.

Related Policies:

Child safe standards policy

Supervision policy

Child safe environments policy

Source

NQF Online Safety Guide – <https://www.acecqa.gov.au/nqf-online-safety-guide>

Playing IT Safe – <https://playingitsafe.org.au/>

eSafety Early Years program for educators – <https://www.esafety.gov.au/educators/early-years-program>

National Model Code for Taking Images or Videos of Children While Providing Early Childhood Education and Care

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<https://www.acecqa.gov.au/sites/default/files/2024-07/National%20Model%20Code%20Taking%20Images%20and%20Videos.pdf>

National Guidelines – Taking images or videos of children while providing early childhood education and care -

<https://www.acecqa.gov.au/sites/default/files/2024-07/Guidelines%20for%20the%20National%20Model%20Code%20Taking%20Images%20and%20Videos.pdf>



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NQF Child Safe Culture Guide – <https://www.acecqa.gov.au/nqf-child-safe-culture-guide>

Be Internet Awesome - https://beinternetawesome.withgoogle.com/en_au

Education and Care Services (Digital and Electronic Devices) Order 2025

Compliance evidence

Education and Care Services National Regulations (2025) 84, 115, 122, 123, 165, 166, 168, 170, 171

National Quality Standards 1.2, 1.3, 2.1, 2.2, 3.1, 4.1, 4.2, 5.1, 5.2, 6.1, 6.2, 7.1, 7.2

Date of current review: Feb 2026

Date of last review: August 2025

Date of next review: August 2026

Approved by: Lisa Collins (Director)

APPENDIXES:

APPENDIX A - Parent Authorisation for visitor device use (eg therapists)

APPENDIX B - Visitor Induction Form – Child-related work

APPENDIX C - Visitor Induction Form – Non child-related work

APPENDIX D - Personal Device Use Request Form

APPENDIX E - Service-issued electronic device register



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Parent authorisation for visitor device use

Child:

Dear _____

As you know an allied health professional works with your child _____ at the service. Our digital media policy does not allow the use of personal devices around the children. However as part of their work your allied health professional has requested permission to use their personal device to support them in working with your child.

At all times educators will be within the space with visitors as per our policies and procedures and will monitor safe digital use through supervision practices.

Please consider whether you give permission for the following: (Allied health professional to complete)

Allied health professional name: _____

Allied health service provided: _____

Types of personal devices requested by professional to use around child:

- Device for recording videos/taking images as part of assessment – e.g. phone or tablet (specify type of device here: _____)
- Device for recording information – e.g. tablet, laptop, voice recorder (specify type of device here: _____)
- Transferring records – e.g. taking photos and information from service-issued devices and transferring them to personal devices
- Other – please specify _____



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Authorisation section: (Parent/guardian to complete)

I give permission for all of the above requested personal device use around my child.

I give permission the following options to be permitted _____

I do not give permission for any of the personal device use options to be used within by child and request they use non-digital recording efforts while working with my child.

Child's name: _____

Parent name: _____

Parent signature: _____ Date: _____

	Admin to complete:		
Original placed in child's file	Yes	Date: _____	Initial: _____
Copy provided to parent	Yes	Date: _____	Initial: _____
Copy provided to visitor	Yes	Date: _____	Initial: _____



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Visitor Induction Form – Child-related work

We prioritise the safety and wellbeing of children within the service and therefore ask that you familiarise yourself with our expectations and help us support positive outcomes.

While on the premises we ask that you:

- Follow all instructions and signage within the service and if you are not sure about something, ask.
- Keep the service safe by not leaving any items the children could access out in their environment. Please keep these locked away in a safe location advised by staff.
- If you need to use equipment that could present a hazard that you do not leave this unattended at any time and stay with it while it is in use and the put it back in the safe location when finished.
- Keep the environment tidy as you go, pick up after yourself, push chairs back in etc. to minimise risks.
- Stay within the supervision of staff at all times and communicate your whereabouts to the staff as you move around the service.
- If you need to work with a child unsupervised you will require written consent from the family prior to this commencing that needs to be shared with the service.
- Any device that can take, store, display or transfer photos or videos will be kept locked away with your belongings at all times when you are in the rooms working with the children, including phones and smart watches.
- No photos or videos of any children within the service are permitted unless you have written consent from the family.
- If you have written consent from the family to take photos and/or videos of a child within your work this must be shared with the service before this can take place and the service device will be shared to allow this to happen and the images/recordings will be forwarded to you. These images must only be used for the direct purpose that permission was obtained and cannot be used for any other purpose.
- If you see anything within the service that you feel could present a risk to the children's safety or wellbeing while in the service you will communicate this to management in a timely manner and support any requests for additional information.
- Failure to comply with any safety obligations will result in your time within the service being terminated and may lead to your conduct being reported to the appropriate authorities.



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I agree to follow all service expectations and understand my role in supporting a child safe environment.

Name: _____ Signature: _____ Date: _____

The following must be provided to support your WWCC being verified:

WWCC: _____ D.O.B: _____

Please provide the details of the organisation you work/represent for where applicable:

Organisation: _____

Contact person: _____ Phone: _____

Email: _____



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Visitor Induction Form – Non child-related work

We prioritise the safety and wellbeing of children within the service and therefore ask that you familiarise yourself with our expectations and help us support positive outcomes.

While on the premises we ask that you:

- Follow all instructions and signage within the service and if you are not sure about something, ask.
- Keep the service safe by not leaving any items the children could access out in their environment. Please keep these locked away in a safe location advised by staff.
- If you need to use equipment that could present a hazard that you do not leave this unattended at any time and stay with it while it is in use and the put if back in the safe location when finished.
- Keep the environment tidy as you go, pick up after yourself, push chairs back in etc. to minimise risks.
- Stay within the supervision of staff at all times and communicate your whereabouts to the staff as you move around the service.
- Any device that can take, store, display or transfer photos or videos will be kept locked away with your belongings at all times when you are in the rooms working with the children – including phones, smartwatches, tablets etc.
- If you are required to use these devices while in the service please let an educator know or move to an area away from the children.
- If you see anything within the service that you feel could present a risk to the children’s safety or wellbeing while in the service you will communicate this to management in a timely manner and support any requests for additional information.
- Failure to comply with any safety obligations will result in your time within the service being terminated and may lead to your conduct being reported to the appropriate authorities.

I agree to follow all service expectations and understand my role in supporting a child safe environment.

Name: _____ Signature: _____ Date: _____

The following must be provided to support your WWCC being verified (if applicable):

WWCC: _____ D.O.B: _____

Please provide the details of the organisation you work/represent for where applicable:

Organisation: _____

Contact person: _____ Phone: _____

Email: _____



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Personal Device Use Request Form

By completing the form you are requesting to have your personal electronic device on or near you while working with the children. Reason for the request: *(Please tick)*

- Personal health requirement – This includes monitoring levels such as heart rate or blood sugar.
- Disability – This includes where the electronic device is used as a tool for communication or other essential means during everyday tasks.
- Family necessity – This includes having an ill or dying family member or a direct family member with additional needs that you are caring for.

Please provide details of how the personal electronic device will be used for (e.g answering calls or texts, using specific apps, etc.):

How long will you likely need the personal device available to you while working with the children? *(Please tick)*

- Less than 2 weeks
- 2 weeks to 1 month
- 1 month to 3 months
- 3 months to 6 months
- 6 months to 1 year
- Ongoing

I agree that by having my personal electronic device on or near me when working directly with the children the following points will be adhered to: *(Please tick)*

- I will not take any photos, videos or audio recordings of any of the children on my personal device.
- I will not allow others to use my personal device while working with children.
- I will only use my device for the reasons outlined above.
- I understand that the use of my personal device will be monitored to ensure that it is being used appropriately.
- I will not use my device at a time that impacts ratio and supervision requirements for the children at the service.
- If there are any changes to the above information, I will communicate these as soon as possible.



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Employee name: _____ Date: _____

Employee Signature: _____

Office use:

Form authorised by: _____ Signature:

Position: AP NS RP Date authorised: _____ Expectations clarified: Yes
 No

This permission will be reviewed quarterly.



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Service-issued electronic device register

Procedure:

Please complete the following form every time a device is assigned to a new employee/group of employees. Such as a change of staff or staff changing rooms/roles. Only employees allocated to a specific device are to use that device.

The following information guides the completion of this record:

- By adding a device to this form this is a declaration that the device is configured to operate in accordance with the service's policies and procedures that relate to child safety or the security of devices. If unsure check with the AP before adding a device.
- Device type: This should be the main type of device for example phone, tablet, camera, computer/laptop etc. Any device that can take, store, transmit or access photos or videos of children must be kept on this register.
- Specific details: This includes any information available regarding make, model, serial number etc.
- Date of supply: The date the device was supplied to the
- Authorised users: The name of the individual, or the room/team who will be authorised to use this device.
- Supplied by: This must be the AP or a person authorised by the AP to allocate electronic devices (E.g. the NS). Put name and position.
- Signature: The signature of the person who supplied the device (must be original signature, not digital that can be replicated)
- Revocation info: Where approval has been revoked include date, name of AP/Authorised person, and signature of AP/Authorised person. Also include the code of the reason for Revocation from the following list:
 - o U – Device upgrade
 - o R – Resignation/termination of employment
 - o C – Change of room/role
 - o M – Misuse of device
 - o O – Other

This record is to be maintained with all service-issued devices and kept at the service for at least 3 years after the record was made.



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Service-issued electronic device register

Device type	Specific details	Date of supply	Authorised user(s)	Supplied by	Signature	Revocation info
Sample line Phone	Samsung Galaxy KHJ8763-982 0	13/10/25	Preschool staff – JH, MN, LO, DR	Jane Smith (NS)	Jane Smith	2/2/26 – Jane Smith Jane Smith – U